

*Protocol for Handling Complaints about a  
Violation of the Terms and Conditions of a  
Certificate of Public Good*

*Vermont Department of Public Service  
Consumer Affairs and Public Information (CAPI)  
112 State St., 3<sup>rd</sup> floor  
Montpelier, VT 05620-2601  
800-622-4496  
[psd.consumer@vermont.gov](mailto:psd.consumer@vermont.gov)*

*August 31, 2016*

Table of Contents

CPG Complaint Protocol ..... 4

    Purpose and History ..... 4

        Purpose..... 4

        History..... 4

Acknowledgements..... 5

Roles and Responsibilities ..... 5

    Complainant..... 5

    Department..... 5

    Public Service Board..... 5

    CPG holder..... 5

Guiding Principles ..... 6

Community Education, Training and Outreach ..... 6

    Department website ..... 6

    CPG holder notices and websites..... 7

    Other permitting agencies and partners ..... 7

    Media ..... 7

    Training..... 7

Filing a Complaint ..... 7

    What is a complaint?..... 7

    Contact methods for filing complaints..... 7

    Hours of operation ..... 8

    Confidentiality ..... 8

    How personal information provided by a complainant will be used and managed ..... 8

Complaint Intake Procedures ..... 9

    Internal (Department) complaint handling..... 9

    Complaints made directly to CPG holders..... 10

    Acknowledge the complaint ..... 10

Complaint Handling Procedures Following Initial Intake ..... 10

    Unsuccessful attempts to follow up ..... 10

    Response time standards for Department staff to reply to complainant ..... 10

    Preliminary assessment of the complaint..... 10

Investigating complaints .....	11
Department case review .....	11
Field investigation and research.....	12
Outcomes/Remedies .....	12
Informal resolution.....	12
Facilitate mediation.....	12
Request compliance .....	12
Failure to comply .....	12
Notifications including final response to complainant .....	13
Complaint Tracking and Consolidating Procedures .....	13
CPG holder procedures for submitting complaint data.....	13
Consolidating complaint data from CPG holders .....	13
Receiving and consolidating complaint data from other state agencies .....	14
Department staff responsibility and procedures for submitting complaint data to CAPI.....	14
Data standards.....	14
Coding.....	15
Reporting.....	16
Review and analyze CPG complaint data monthly, report to Commissioner.....	16
Quarterly summary published on the Department website.....	16
Complaint consolidation .....	16
Data aggregation and report generation .....	16
Requests for reports .....	17

# **CPG Complaint Protocol**

## ***Purpose and History***

### **Purpose**

An effective complaint protocol will provide clear guidance for people making complaints, improve complaint handling and response and provide better data and reporting.

### **History**

Under Act 130 in 2016, the Vermont State Assembly directed the Department of Public Service to establish and implement a complaint protocol as follows.

#### **Sec. 5c. DEPARTMENT OF PUBLIC SERVICE; CERTIFICATE OF PUBLIC GOOD; COMPLAINT PROTOCOL**

(a) Not later than September 1, 2016, the Commissioner of Public Service shall establish and implement a protocol for handling complaints concerning the alleged failure of a company to comply with the terms and conditions of a certificate of public good issued by the Public Service Board under 30 V.S.A. §§ 248 or 248a. The Commissioner may revise the protocol at any time to achieve a more effective and satisfactory response to complaints.

(b) The purpose of this section is to create a single location within State government for receipt and tracking of all complaints described in subsection (a) of this section. The protocol shall include a process for filing, investigating, and responding to complaints in a timely manner, as well as a procedure for tracking the number and nature of complaints received and a summary of actions taken by the Department of Public Service in response to each complaint, which information shall be aggregated and reported annually to the General Assembly beginning January 1, 2017, notwithstanding 2 V.S.A. § 20(d). In addition, the Department shall keep a record of complaints filed under the protocol. A summary of the record shall be published on a website maintained by the Department to increase public awareness and transparency, which may reduce the occurrence of redundant complaint filings. The Commissioner's protocol shall include standards and procedures for consolidating complaints of a similar nature involving the same company and procedures under which a company receiving a complaint informs the Department of the complaint and its nature and such information as the Commissioner determines is necessary to track its progress and response.

(c) A complainant shall not be required to direct a complaint to a company prior to submitting a complaint with the Department of Public Service pursuant to the complaint protocol established under this section.

(d) The Commissioner may retain experts and other personnel as identified in 30 V.S.A. § 20 to investigate complaints, and may allocate the reasonable expenses incurred in retaining such personnel to the company as provided under 30 V.S.A. § 21.

(e) The complaint protocol established under this section shall be in addition to any procedure established under 30 V.S.A. § 208. Unresolved complaints may be considered by the Public Service Board pursuant to its authority under Title 30, including 30 V.S.A. § 8(f), and Public Service Board Rules.

(f) With its report filed under this section on or before January 1, 2018, the Commissioner shall make recommendations regarding the establishment of and payment for an ongoing process for

monitoring a company's compliance with a certificate of public good for the purpose of reducing the filing of individual complaints under this section.

## ***Acknowledgements***

The Department of Public Service gratefully acknowledges the concerned citizens of Vermont, businesses, utilities, organizations and governmental units that participated in the development of this protocol.

## ***Roles and Responsibilities***

### **Complainant**

The complainant may make their complaint to the Consumer Affairs and Public Information Division (CAPI) without first contacting the CPG holder about which they are complaining. For emergency public safety concerns, a complainant may be directed to contact public safety agencies such as the Fire Department.

### **Department**

CAPI will respond to complainants and collect information about their complaint. They will keep individual records confidential and will aggregate information in such a way as to protect personal privacy. Unless the complainant requests anonymity, CAPI will share the complainant's name and other personally identifiable information with the CPG holder as needed in order to investigate the complaint with the CPG holder. CAPI and other Department staff will research and investigate and respond to complaints. CAPI will manage its records to produce meaningful reports and ensure their accuracy. The Department will analyze complaint data, process and outcomes for Vermonters and the efficacy of the complaint protocol in its first and subsequent reports and recommendations to the legislature. The Department will refer cases, as appropriate to the Public Service Board.

### **Public Service Board**

The Public Service Board (PSB) will refer CPG §§ 248 and 248a complaints directly to CAPI for intake and investigation. If the CAPI investigation results in a filing or referral to the PSB, the PSB will determine whether or not to open a docket to investigate further and will inform the complainant and CAPI of its determination.

### **CPG holder**

A CPG holder will continue to follow any existing complaint investigation protocols and monitoring standards included as part of its CPG. CPG holders shall collect prescribed intake detail and forward the details of the complaint to CAPI for reporting and further investigation (see Complaint Tracking and Consolidating Procedures, pg. 13). CPG holders shall inform

complainants that their complaint will be forwarded to the Department of Public Service for investigation and response.

### ***Guiding Principles***

**Clearinghouse** – CAPI will maintain a record of all complaints about alleged violation(s) of CPGs issued under 30 V.S.A. §§ 248 or 248a for the purpose of providing accurate aggregate information to the Vermont State legislature. A complainant shall not be required to direct a complaint to a CPG holder prior to submitting a complaint with the DPS pursuant to the complaint protocol established under this section. CPG holder complaint records will therefore be input into CAPI records for consolidation, aggregation, analysis and reporting.

**Accessibility** – The public should be able to access the complaints process via various methods of contact including in person, phone, letter, fax, e-mail and an online complaint form.

**Visibility** – Information about how and where to make a complaint will be reasonably publicized on the Department website among other methods. It is recommended that websites of CPG holders also include information about how and where to file a complaint, and provide information about how to file a complaint with CAPI when complainants contact the CPG holder directly.

**Responsiveness** – Complaints will be acknowledged and responded to in a timely manner. Complainants will receive notification indicating receipt of the complaint including a reasonable time frame for investigation and response. Complainants will be kept informed of any delays.

**Confidentiality** – Complaints to the Consumer Affairs and Public Information Division are confidential. Complaint information under this protocol will be collected, used, and disclosed according to Vermont statute.

**Consumer focus** – Written and verbal communication with consumers will be clear and concise. Analysis of complaints and periodic reporting will reflect the Department's commitment to addressing public needs, undertaking action to remedy problems, and improving public service delivery.

**Documentation** – Detailed and accurate records will be kept and maintained by CAPI for all §§ 248 and 248a CPG complaints filed with any Department staff. CAPI will receive, file and manage complaints initially received by a CPG holder or other state agency and forwarded to CAPI for intake, research and response.

### ***Community Education, Training and Outreach***

#### **Department website**

Complainants can currently file a complaint about potential CPG violations at [psd.consumer@vermont.gov](mailto:psd.consumer@vermont.gov). An online complaint form is accessible at the Department's website.

## **CPG holder notices and websites**

Entities that apply for and receive a CPG under §§ 248 or 248a are encouraged to place information about how to file a complaint in a reasonably prominent place on their websites, and to inform complainants who contact the CPG holder directly.

CPG holders are encouraged to provide CAPI with emergency response contact information for nights and weekends (if applicable) to publish on the Department website.

## **Other permitting agencies and partners**

Outreach will be conducted to state agencies such as the Agency of Natural Resources (ANR), Attorney General's office (AG), and the Agency of Transportation (AOT) about the complaint protocol. CAPI will offer to provide web links and encourage similar hosting of a link to the CPG Complaint Protocol web page and the online complaint form. Similar outreach will be conducted to municipalities and organizations like the Vermont League of Cities and Towns.

## **Media**

The Department will issue a release to the media when it implements this complaint protocol.

## **Training**

CAPI will provide training to Department staff about the protocol and its requirements of staff handling complaints including data input and reporting.

CAPI will provide training to any CPG holder or their staff seeking training about the complaint protocol and its recordkeeping and reporting requirements. CAPI will also provide training to other state agencies, if requested, about the protocol consolidation and reporting procedures.

Public Advocacy (PA) and the Planning and Energy Resource Divisions will provide CAPI with training about how to research CPG provisions and the relevant documents for CAPI's initial investigations.

## ***Filing a Complaint***

### **What is a complaint?**

A complaint under this protocol is a communication of dissatisfaction to a CPG holder, another state agency or the Department which, upon investigation, is determined to be attributable to a potential violation of the conditions of a CPG issued by the PSB under 30 V.S.A. §§ 248 or 248a.

### **Contact methods for filing complaints**

A person or business may file a complaint by phone, e-mail, mail, fax or in person with CAPI. A CPG holder shall provide its record of a complaint by e-mail to CAPI. The CPG holder may also refer the complainant to CAPI to file a complaint or alternatively, the CPG holder may contact CAPI with the consumer's contact information and ask CAPI to reach out to the complainant for details about the complaint.

Department staff in Divisions other than CAPI may transfer a complainant to the CAPI hotline, refer a caller to CAPI by providing contact information or ask CAPI to respond or reach out to a person or business making a complaint by providing CAPI with the complainant's contact information, or input basic complaint details directly into the new database (when available).

CAPI can receive complaints via the following ways:

- In person: 112 State Street, Montpelier, VT (3<sup>rd</sup> floor)
- Mail: VT Department of Public Service, Consumer Affairs Division  
112 State Street  
Montpelier, VT 05620-2601
- Email: [PSD.Consumer@vermont.gov](mailto:PSD.Consumer@vermont.gov)
- Phone: 1-800-622-4496 or 1-802-828-2332
- TTY: 1-800-734-8390
- Fax: 802-828-2382
- Website form (under development)

## **Hours of operation**

CAPI's hours of operation are Monday–Friday 7:45 am–4:30 pm with the exception of holidays recognized by the State of Vermont.

## **Confidentiality**

Information that could be used to identify a complainant's identity, including name, street/ mailing address, telephone number, and e-mail address will be considered confidential and only shared among the CPG holder and Department staff as necessary to investigate the complaint. Non-identifying information such as town of residence and details of the complaint may be shared with the legislature and posted on the Department website.

If a complaint is referred to the PSB for further investigation, the complainant's personally identifying information will be included as part of the official record of the complaint and will be available to the public. CAPI staff will inform complainants about this at the time CAPI takes in a complaint.

## **How personal information provided by a complainant will be used and managed**

A complainant's personal information will be stored in a database accessible only to CAPI staff.

Identifying data will be redacted prior to sharing complaint information with legislators or other parties, unless the complainant has previously agreed to have his/her identifying information shared. Periodic summaries/reports will be posted on the Department website without personally identifying information. An annual report of complaint data will be provided to the legislature. This report will not include personally identifying data.

### ***Complaint Intake Procedures***

The following information will be collected at intake **from the complainant**:

- Name, address, phone #, other contact info (e-mail, cell #, etc.) of the complainant
- CPG holder the complaint is about
- CPG # if known
- Date and location of the incident or event giving rise to the complaint
- Nature of the complaint
- Proximity of complainant to site
- History and details about action taken by the complainant and/or CPG holder prior to making the complaint with CAPI
- Information about any contacts with the CPG holder
- Communication or correspondence provided by the CPG holder
- Is the complainant expecting follow up from the entity they contacted?
- What resolution is the complainant seeking?
- Preferred means of communication

Information to be obtained **from CPG holders** during initial research about the complaint (if needed):

- Name, address, phone #, other contact info of the CPG holder contact person
- Name and CPG # of the project
- Name, address, phone #, other contact info (e-mail, cell #, etc.) of the complainant
- Date of contact from the complainant, if any
- Date and location of the incident causing the complaint
- Nature of the complaint
- What steps the CPG holder took (if any) to try and resolve the issue (if possible)
- Whether the complainant was satisfied with the resolution?
- What the complainant was told are to be the next steps
- Complainant's preferred means of communication

### **Internal (Department) complaint handling**

When a complaint is received by another division within the Department besides CAPI, that Division shall forward the complaint to CAPI.

If a Department attorney is assigned to a complaint about a CPG holder, CAPI will coordinate with the attorney regarding investigation/research about the complaint.

### **Complaints made directly to CPG holders**

CPG holders must continue to follow any existing monitoring, reporting, and complaint-handling standards ordered as part of their CPGs or PSB-approved protocols. In addition, CPG holders falling within the scope of this protocol shall provide initial complaint data to CAPI as follows: The CPG holder shall collect prescribed intake detail and forward the details of the complaint to CAPI for reporting and follow up within three (3) business days of receiving the complaint via email at [psd.consumer@vermont.gov](mailto:psd.consumer@vermont.gov) or the Department's online complaint form. CPG holders shall inform complainants that their complaint will be forwarded to the Department of Public Service for potential research, response and reporting purposes.

Reports made by CPG holders to the Department under any existing monitoring, reporting or complaint handling standards as part of their CPG will be made available to CAPI for data and reporting purposes.

### **Acknowledge the complaint**

CAPI will acknowledge a complaint by communicating with the complainant after receiving information about a complaint from the CPG holder, other state agency or another referral source such as the PSB.

### ***Complaint Handling Procedures Following Initial Intake***

#### **Unsuccessful attempts to follow up**

CAPI will make two (2) attempts at follow up with the complainant after receiving a complaint or complaint data from a CPG holder. If the complainant does not respond within ten (10) business days, CAPI will close the case and code it accordingly.

#### **Response time standards for Department staff to reply to complainant**

CAPI will reply back to the complainant as soon as is reasonably practicable after the complaint has been investigated, but at the least will provide updates to the complainant every two (2) weeks with progress about how the complaint investigation is proceeding.

#### **Preliminary assessment of the complaint**

Complaints will be documented in CAPI's records and a case number assigned.

CAPI will review the relevant CPG terms and conditions to see if there may be a potential violation.

If the preliminary assessment indicates that there is **not** a potential violation, CAPI will make a determination about investigating the complaint for other reasons. CAPI will inform the complainant about the results of its initial research. CAPI will provide the complainant with information about what further research is planned to investigate further (if any) and any next steps the complainant may take. CAPI will provide information as appropriate about what the complainant might expect for the complaint going forward.

If the preliminary assessment indicates that there **may** be a potential violation, CAPI will begin the investigation by contacting the CPG holder for information and/or action steps and requesting a response back to CAPI.

### **CPG holders shall respond to a complaint inquiry from CAPI**

CPG holders shall respond to investigatory questions by CAPI within two (2) weeks of initial contact, or if unable to respond during that time frame, will request an extension within the two-week period, with a proposed response time that is reasonable. CPG holders will provide updated information at least as frequently as every two (2) weeks thereafter. In no event will a final response to the complaint investigation be longer than 30 days, unless the CPG holder can show good cause why this is not possible.

### **Investigating complaints**

CAPI will perform desk level investigation to determine the extent of any potential CPG violation. Examples of activity may include soliciting additional information from other state or local governmental entities including parties to the relevant CPG, requesting photos or other information from the complainant, and comparing the current complaint to other similar complaints about this CPG holder or others. Correspondence, relevant documents and photos will be scanned and attached to the electronic case record.

CAPI's primary goal is to ensure compliance by the CPG holder with the terms and conditions of the CPG. CAPI will work to achieve this goal through either facilitation of an informal resolution between the complainant and the CPG holder or voluntary compliance by the CPG holder.

When CAPI determines that an informal resolution is unlikely or if, in its judgment, the complaint needs to be escalated, no longer than 30 days after receiving the initial complaint, it will request a case review with PA.

### **Department case review**

Case reviews will be established as needed or if there is sufficient complaint volume, a regular periodic meeting will be established.

The CAPI specialist will prepare a summary of the case or cases and request a consultation with a PA attorney or the Public Advocate. The case review will be used to determine the next course of action – further investigation, mediation, warning letter, the Department filing recommendations with the PSB or referring the complainant directly to the Board.

### **Field investigation and research**

Field work including the retention of experts or consultants, site visits, data analysis, etc. will be executed only after a formal proceeding has been initiated by the PSB. Reasonable expenses for use of consultants/experts may be billed back to the CPG holder after a docket has been opened by the PSB.

### ***Outcomes/Remedies***

#### **Informal resolution**

An informal resolution is accomplished when CAPI or other Department employees facilitate an agreement between the complainant and the CPG holder as to an effective resolution to the complaint. The agreed upon resolution will be clearly communicated in writing via email or on Department letterhead as warranted by the nature of the complaint, to both the complainant and the CPG holder representative. An informal resolution may be accomplished with or without evidence of failure by the CPG holder to adhere to the terms and conditions of their certificate of public good.

#### **Facilitate mediation**

The Department will contract with outside mediation services at its discretion and utilize its bill back authority for cost recovery to seek a mediated resolution.

#### **Request compliance**

When research yields a potential failure on the part of a CPG holder to comply with the terms and conditions of its certificate of public good, CAPI or a Department attorney will inform the CPG holder of such in writing and request that the CPG holder correct the problem. The requested compliance measures will be clearly communicated in writing via email or on Department letterhead as warranted by the nature of the complaint to the CPG holder representative. Copies of this correspondence will be made available to the complainant.

#### **Failure to comply**

When, in the Department's opinion, there is clear failure of a CPG holder to abide by the terms and conditions of its certificate of public good, the Department may initiate a filing about the complaint with the PSB at any time. This filing will typically include an affidavit of facts from the investigation prepared by CAPI and a letter from a Department attorney. The letter may

include recommendations to the PSB such as recommending a penalty or an order to show cause or requesting a hearing.

Alternatively, the Department may advise the complainant to file a formal complaint with the Public Service Board and if so, will let the complainant know that the Department will be advising the PSB of this referral.

### **Notifications including final response to complainant**

Complainants will receive regular updates every two weeks about the progress of the Department to resolve the initial complaint.

Complainants will receive notice when their complaint case has been closed. The complainant will be provided with a final response including a brief description of the resolution and will be told the reason and the date that the case is closed.

A summary of the outcome, or progress (as appropriate), will be sent by email to the referral sources for cases referred by the PSB, the Governor's Office, the Commissioner of the Department of Public Service or a legislator.

### ***Complaint Tracking and Consolidating Procedures***

#### **CPG holder procedures for submitting complaint data**

A CPG holder receiving a complaint shall submit the complaint or contact information to CAPI within three (3) business days of being contacted by the complainant. A CPG holder may use the form provided by the Department to record detail of the complaint or direct the complainant to e-mail or call CAPI. A CPG holder may forward e-mail from a complainant to the CAPI consumer mailbox ([psd.consumer@vermont.gov](mailto:psd.consumer@vermont.gov)). A CPG holder shall tell a complainant that information about the complaint will be shared with the Department. The complainant may choose not to provide identifying information, in which case, the CPG holder will provide details of the incident only when it reports the complaint to CAPI.

#### **Consolidating complaint data from CPG holders**

Complaints made to CPG holders and received individually by CAPI will be input into its database. A new complaint will be opened and researched when a CPG holder provides complaint information pertinent to an individual complaint. Follow up from a complainant regarding the same incident will be consolidated into the same complaint case history. Subsequent contacts about or from a complainant more than 60 days following initial case closure will be considered a new complaint in CAPI records. The complaint will be reassigned to a new staff person in CAPI, as a best practice.

CPG holders are advised to report complaints to CAPI *as they occur or are reported by complainants* for research and investigation.

Periodic or grouped reports of resolved complaints will only be requested if complaints have not been reported to the Department/CAPI otherwise (see Complaints made directly to CPG holders, p. 10). These periodic/grouped reports will be accepted quarterly by CAPI at after the end of each quartile month from CPG holders. However, these data will only be used by CAPI for reporting purposes. Grouped complaints received in this way will not be researched or investigated by CAPI.

### **Receiving and consolidating complaint data from other state agencies**

State agencies subject to 30 V.S.A. §§ 248 or 248a that receive complaints are encouraged to advise complainants to file a complaint directly with CAPI. These agencies may collect complainant contact information and provide it to CAPI for follow up with the complainant.

Complaints made to state agencies and forwarded to CAPI for research and investigation will be input into the CAPI database. Follow up from a complainant about the same incident will be consolidated into the same complaint case history. When the subject of a particular complaint is within the expertise of a specific state agency, CAPI will rely upon that agency to investigate and evaluate the complaint, and report its findings to CAPI.

Periodic or grouped reports of investigated complaints will be accepted quarterly after the end of each quartile month from state agencies that have investigated complaints during the prior quarter. CAPI will reach out to relevant state agencies on a quarterly basis to request such reports. However, these data will only be used for reporting purposes. Grouped complaints received in this way will not be researched or investigated by CAPI.

State agencies that CAPI will reach out to for reports on a quarterly basis include:

- Attorney General
- Department of Health
- Agency of Natural Resources
- Historic Preservation
- Agency of Transportation
- Agency of Agriculture, Food & Markets
- Public Service Board

### **Department staff responsibility and procedures for submitting complaint data to CAPI**

Department staff shall submit complaint details or contact information to CAPI within three (3) business days of complaint receipt. Staff may use the online form to record details of the complaint or direct the complainant to e-mail or call CAPI. A staff person may forward e-mails from a complainant to the consumer mailbox ([psd.consumer@vermont.gov](mailto:psd.consumer@vermont.gov)) or forward voicemails to extension 4051.

### **Data standards**

Complaint data should be entered by CAPI as it comes in (real time data entry). Complaints should contain contact information for the person or business making the complaint (if shared), the name and location of the CPG holder and project, the CPG number, time and details of the incident and all steps taken to investigate the complaint and respond to the complainant prior to being closed. The records will identify any other permitting entities for which complaint information may need to be collected or consolidated.

E-mails about the complaint, between complainant and CAPI, between CAPI and the CPG holder and between CAPI and other Department or other state agency staff, or any other e-mails related to the case history, will be copied and pasted directly into the CAPI database.

Progress notes about the case will be entered into the case history on an ongoing basis to accurately reflect the progression of the case.

Written documents and other information relevant to the case history will be scanned and attached to the electronic case history records.

Cases will remain open until closed for one of the following reasons:

- Informal resolution agreed to by both the complainant and the CPG holder
- Negotiated or mediated resolution accepted by both the complainant and the CPG holder
- Unresolved and the complainant is referred to the Public Service Board for further action
- Unresolved and escalated by the Department (see p. 16) to the Public Service Board for further action
- Withdrawn by the complainant
- Unresolved, no clear violation of terms and conditions of certificate of public good
- Resolved, no clear violation of terms and conditions of certificate of public good

Quality control will be provided quarterly by individual case review of all data input, performed by the CAPI Coordinator. Data input by the CAPI Coordinator will be reviewed by another staff person in CAPI.

Reporting functions regarding aggregate complaint data will be available to CAPI and other Department management for oversight, quality control and reporting. Internal complaint case review will be performed to manage case volume, case assignment and case progression.

Records relating to complaints will be retained for 10 years. Data will be managed in a secure password protected database. All data and complaint records will be housed onsite.

Case records will be maintained with integrity and confidentiality. Access to case-specific information will be limited to CAPI staff.

## **Coding**

**CAPI Complaint Standards – CAPI will label complaints as follows:**

**Grievance:** For this protocol, all investigated complaints about potential CPG violations will initially be labeled as grievances.

**Escalation:** For this protocol, complaints will be labeled as escalations when investigation into a grievance determines a probable violation on the part of the CPG holder and the complaint is escalated to the PSB by action of the Department.

CAPI will code all complaints with the complaint code – “CPG.” Applicable issues codes that will help identify the different types of complaints will be used to help with data aggregation and reporting.

## ***Reporting***

### **Review and analyze CPG complaint data monthly, report to Commissioner**

On a monthly basis, CAPI will report to the commissioner the following information under this protocol:

- Number of complaints opened
- Number of complaints that were determined not to be potential violations of a CPG
- Number of complaints that were determined to be probable CPG violations
- Number of complaints still under investigation and the status of each

### **Quarterly summary published on the Department website**

A summary of complaint data about potential CPG violations will be posted on the Department website by the last day of the month following the end of the quarter: April 30, July 31, October 31, and January 31, or, if the posting date falls on a weekend or holiday, on the last business day of the work week before the posting date. The information will be available on the CPG Complaint Protocol web page.

### **Complaint consolidation**

Report summaries about complaints made to other state agencies and received quarterly at the Department will be consolidated for inclusion in quarterly or annual reporting. CAPI will consolidate reported complaint summaries received from CPG holders or other entities into its annual reporting to the legislature and quarterly reporting on the Department website. However, CAPI will not merge periodic complaint summary reports into its consumer complaint database.

### **Data aggregation and report generation**

CAPI will input complaint information directly into case and contact management software. Multiple contacts from a complainant about a single incident will be input into one single case history.

Reports will aggregate data by town, by CPG holder or project and/or by type of complaint.

### **Requests for reports**

Requests for reports may be directed to the CAPI Coordinator for Consumer Affairs at [psd.consumer@vermont.gov](mailto:psd.consumer@vermont.gov) or by calling 802-828-4078.

### **Customer service improvement process**

The Department has established a goal of continuously improving customer service regarding investigating and responding to complaints about potential CPG violation complaints.