

AGENCY STRATEGIC PLAN

Fiscal Years 2013-2017

**Submitted to the Governor's Office of Budget, Planning and Policy
and the Legislative Budget Board**

by

OFFICE OF PUBLIC UTILITY COUNSEL



July 2, 2012

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Sheri Givens

December 21, 2009 through present

Austin, TX

July 2, 2012

Signed:



Sheri Givens
Public Counsel

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Part I. Vision, Mission, Philosophy and Goals

Securing Our Future

Vision of Texas State Government

- Ensuring the economic competitiveness of our state by adhering to principles of fiscal discipline, setting clear budget priorities, living within our means and limiting the growth of government;
- Investing in critical water, energy and transportation infrastructure needs to meet the demands of our rapidly growing state;
- Ensuring excellence and accountability in public schools and institutions of higher education as we invest in the future of this state and make sure Texans are prepared to compete in the global marketplace;
- Defending Texans by safeguarding our neighborhoods and protecting our international border; and
- Increasing transparency and efficiency at all levels of government to guard against waste, fraud and abuse, ensuring that Texas taxpayers keep more of their hard-earned money to keep our economy and our families strong.

Mission of Texas State Government

Texas state government must be limited, efficient, and completely accountable. It should foster opportunity and economic prosperity, focus on critical priorities, and support the creation of strong family environments for our children. The stewards of the public trust must be men and women who administer state government in a fair, just, and responsible manner. To honor the public trust, state officials must seek new and innovative ways to meet state government priorities in a fiscally responsible manner.

Aim high . . . we are not here to achieve inconsequential things!

Philosophy of Texas State Government

The task before all state public servants is to govern in a manner worthy of this great state. We are a great enterprise, and as an enterprise, we will promote the following core principles:

- First and foremost, Texas matters most. This is the overarching, guiding principle by which we will make decisions. Our state, and its future, is more important than party, politics, or individual recognition.

- Government should be limited in size and mission, but it must be highly effective in performing the tasks it undertakes.
- Decisions affecting individual Texans, in most instances, are best made by those individuals, their families, and the local government closest to their communities.
- Competition is the greatest incentive for achievement and excellence. It inspires ingenuity and requires individuals to set their sights high. Just as competition inspires excellence, a sense of personal responsibility drives individual citizens to do more for their future and the future of those they love.
- Public administration must be open and honest, pursuing the high road rather than the expedient course. We must be accountable to taxpayers for our actions.
- State government has a responsibility to safeguard taxpayer dollars by eliminating waste and abuse and providing efficient and honest government.
- Finally, state government should be humble, recognizing that all its power and authority is granted to it by the people of Texas, and those who make decisions wielding the power of the state should exercise their authority cautiously and fairly.

Relevant Statewide Goals and Benchmarks

Priority Goal

To ensure Texans are effectively and efficiently served by high-quality professionals and businesses by:

- Implementing clear standards;
- Ensuring compliance;
- Establishing market-based solutions; and
- Reducing the regulatory burden on people and business.

Benchmarks

- Ratio of supply of electricity generation capacity to demand.

Office of Public Utility Counsel Mission

The mission of the Office of Public Utility Counsel (OPUC) is to provide quality representation, pertinent information, and valuable customer assistance by skilled professionals in an efficient manner to Texas residential and small business telephone and electric utility customers in appropriate state and federal regulatory, judicial, and market-based venues to ensure abundant utility services are available to them at just and reasonable rates in an increasingly competitive environment.

Office of Public Utility Counsel Philosophy

To accomplish our mission, we commit to providing the highest quality legal, professional, and technical representation to residential and small business utility customers, so that all Texans are provided ample, affordable, and reliable electric and telecommunications services and competitive markets are developed to benefit all customers.

Part II. External/Internal Assessment**Chapter 1. Overview of Agency Scope and Functions****A. Statutory Basis**

The Office of Public Utility Counsel (OPUC) was created in 1983 in response to legislative and consumer group concerns that the residential and small business utility ratepayers were not being adequately represented in the utility proceedings that ultimately affected them. Utility companies and large consumers had numerous resources to aggressively present their positions. However, residential and small business ratepayers generally did not have entities that represented their interests before the Public Utility Commission (PUC), other agencies, and the courts, because they were individually unable to afford the cost of presenting full legal cases.

The Legislature determined that this inequity resulted in an imbalance in the regulatory process. OPUC was created to provide balance to the process. The Public Utility Regulatory Act (PURA), Tex. Util. Code Ann. §§ 13.001 *et seq.*, charges OPUC with representing residential and small business consumers in proceedings affecting electric and telecommunications rates and services. In 2005, the Legislature expanded the agency's enabling legislation to provide information of interest to the public and to communicate with agency clients in assessing their needs and setting the office's priorities to enhance agency representation of their interests.

OPUC represents these consumers at the PUC, as well as in both state and federal courts, at the Federal Communications Commission (FCC), at the North American Electric Reliability Corporation (NERC), and at the Federal Energy Regulatory Commission (FERC). Additionally, OPUC is an active participant in the Texas Reliability Entity, Inc. (Texas RE), which is the regional entity that monitors and enforces compliance with reliability standards for NERC, develops regional standards and monitors compliance with the ERCOT protocols, and the Electric Reliability Council of Texas (ERCOT), which is the Independent System Operator for 75% of the Texas electric grid's land area and 85% of the Texas electric load.¹ Decisions made at the courts, regulatory agencies and at ERCOT directly impact the price, offering, and reliability of utility services. OPUC represents the interests of residential and small business consumers when those decisions are being formed and made. In rulemakings, projects, contested cases, appeals, and at market-driven forums, including ERCOT Board of Directors meetings, committees and working-groups, OPUC provides legal and technical comments, testimony, and proposals that benefit residential and small business customers and promote their interests.

B. Historical Perspective

Regulation of electric and telephone utilities became an issue shortly after the turn of the last century. Until 1975, municipalities were charged with the duty of regulating these utilities. This role was relatively uncontroversial until the early 1970s when increasing energy costs and growing concern about the practices of the Bell telephone system galvanized public opinion. Legislative committees in the early part of that decade concluded that municipal utility regulation had become ineffective because of the lack of a comprehensive system of regulation and the cities' inability to muster enough resources to defend their rate decisions in the lengthy court battles that always followed utility rate applications.

- Accordingly, in 1975, the Texas PUC was created to oversee statewide regulation of electric, telecommunications, and water utilities.
- As noted above, OPUC was created later, in 1983, to provide specific representation of residential and small business consumers in the utility regulatory process.
- In 1985, the Texas Legislature transferred the regulation and advocacy of retail water and sewer rates from the PUC and OPUC under PURA, and placed those provisions in the Water Utility Regulatory Act (WURA) with water and sewer jurisdiction transferred to the Texas Water Commission, now the Texas Commission on Environmental Quality (TCEQ).
- In 1995, the Texas Legislature enacted legislation allowing competition in the electric wholesale market.
- In 1996, the U.S. Congress passed the Federal Telecommunications Act of 1996 allowing for competition in local retail telecommunications markets.
- In 1997, the Texas Legislature expanded OPUC's statutory authority, under Subchapter B of the Gas Utility Regulatory Act (GURA), to allow OPUC to intervene on behalf of residential and small commercial customers, as a class, in gas utility appeals before the Texas Railroad Commission, but only at the request of a municipality.
- In 1999, the Texas Legislature provided restructuring for the Texas retail electric market and enhancing customer safeguards.

C. Who are we in the public's perception?

OPUC serves as consumers' eyes, ears, and voice in both regulatory and market proceedings to bring a balance to these processes and create value on consumers' behalf. Because OPUC is tasked specifically with representing residential and small business interests, it brings a focus on their behalf that no other market participant is able to represent.

OPUC is authorized by statute to ensure just and reasonable rates and the equitable availability of communications and electric industry services by assessing the effect of utility rate changes and other regulatory actions on residential and small business consumers. Accordingly, OPUC represents residential and small business consumers as a class in litigated proceedings, rulemaking meetings and workshops, market forums, ERCOT, Texas RE and other

venues on matters involving rates, rules, and policies pertaining to the provision of telecommunications and electric utility rates and services. As previously noted, one primary reason OPUC was created in 1983 was because residential and small business consumers were not adequately represented or protected in communications and electric utility regulatory and market proceedings. The need to protect these classes of consumers continues to be relevant.

In addition, OPUC is also authorized by statute to provide information of interest to the public and to communicate with the agency's clients in assessing their needs and setting the office's priorities for representation. In addition to conducting annual customer surveys and an annual meeting, OPUC continues to seek opportunities to communicate with its clients by targeting a variety of organizations and individuals. For example, OPUC has met with Chambers of Commerce, health and social services organizations, small business associations, representatives of the military community, and other associations in various towns and cities across the state. These opportunities establish a two-way dialogue so OPUC can foster the attorney-client relationship by hearing consumers' concerns and provide needed information to better represent customers in proceedings before the PUC and other regulatory venues

Chapter 2. Organizational Aspects

A. Size and Composition of Workforce

As of July 1, 2012, OPUC had a total of 15 filled, full-time positions. OPUC's workforce is 20% Hispanic and 73% female.

Although OPUC maintains a small staff of regulatory analysts, these analysts are sometimes unable to address certain technical issues because of workload constraints or lack of necessary expertise. When necessary, OPUC utilizes and contracts with outside expert witnesses to address these issues. These outside expert witnesses are experienced professionals, such as engineers, economists, accountants, or telecommunications analysts who have particular knowledge or expertise with specific issues in a pending proceeding.

B. Organizational Structure and Process

OPUC is headed by the Public Counsel, who is appointed by the Governor and confirmed by the Senate for a two-year term. The Public Counsel must be licensed to practice law in the State of Texas and must be a Texas resident. The eighth and current Public Counsel is Sheri Givens, first appointed by Governor Rick Perry on December 21, 2009, reappointed on February 1, 2011, and confirmed by the Texas Senate during the Eighty-Second Regular Legislative Session.

The Public Counsel supervises the overall operations of the agency and establishes agency policy. Specifically, the Public Counsel is responsible for the agency budget, staff hiring and termination, agency policy and administration, and the selection of cases in which to intervene.

OPUC consists of two divisions, the Litigation Division and the Market Representation and Communications Division.

- The Litigation Division is responsible for representing the interests of residential and small business consumers in litigated matters before the Texas PUC and other jurisdictional entities as necessary (State and District Court, the FERC, the FCC, etc.). In addition to the Director, who is an attorney, the Division also includes two additional attorneys and three regulatory analysts.
- The Market Representation and Communications Division is responsible for representing the interests of residential and small business consumers in non-litigated matters, focusing on consumer market policy representation before the Texas PUC, ERCOT, in rulemakings and communications to consumers. In addition to the Director, the Division also includes one attorney and one information specialist.
- In addition to the 10 professional positions already noted, OPUC's Business Manager, the Governmental Relations Liaison, and 3 administrative support staff complete the 15 positions.

C. Geographical Location of Agency

The Office of Public Utility Counsel is located in the William B. Travis Building at 1701 North Congress Avenue, Suite 9-180 in Austin, Texas.

D. Agency Use of Historically Underutilized Businesses

The Office of Public Utility Counsel will continue to make a good faith effort to include historically underutilized businesses (HUBs) in its delegated purchases and contracts awarded annually. Due to the nature of the agency’s business, OPUC does not procure in the Heavy Construction, Building Construction, or Special Trade Construction categories. The agency also did not make any procurements in the professional services category. The Counsel’s percentages for the Other Services category is below the state goal for this category because of the limited number of HUB vendors that specialize in the specific areas which OPUC requires those services.

Category	Statewide Goal	OPUC FY 2011
Other Services	33.0%	8.20%
Commodities	12.6%	27.88%

OPUC will adopt the guidelines recommended by the Texas Comptroller of Public Accounts Office as its internal goals for future HUB utilization. The agency will continue to broaden its internal list of HUB vendors by category of service or commodities and will continue to make every effort to find and utilize competitive HUB vendors whenever possible.

E. Key Organizational Events, Areas of Change, and Impact on Organization

Prior to 1995, the traditional telephone and electric utility regulatory paradigm in Texas focused on rate and rate-related litigation consistent with the types of regulation inherent with the fully regulated, bundled utility construct. The advent of wholesale electric competition legislation in 1995, the dawn of local retail telecommunications competition promulgated by the 1996 Federal Telecommunications Act, and the initiation of electric market restructuring and Texas electric choice in 1999 has shifted the traditional regulatory paradigm so that it now has added multiple market-based, competitive issues that need to be addressed along with the many rate and rate-related proceedings that continue to be filed. Accordingly, and as noted above, OPUC has structured its organization in such a way as to bring value on behalf of residential and small business customers to both the traditional regulated issues and to the great variety of market-based, competitive issues that continue to influence the current regulatory paradigm. OPUC’s current structure allows it to not only intervene as an active “litigant” in docketed proceedings but also to bring active policy participation as a “market participant” in all regulatory venues (PUC, ERCOT, etc.) in rulemakings, projects, market-driven committees, subcommittees, workshops, and community forums.

Chapter 3. Fiscal Aspects

OPUC was appropriated a total of \$3,007,406 for the 2012-2013 biennium from the General Revenue Fund.

PURA authorizes the Texas Comptroller of Public Accounts to assess and collect one-sixth of 1% of the Public Utility Gross Receipts Tax on utility bills to pay for utility regulation in Texas. The gross receipts tax collected approximately \$50 million in 2011 of which \$1.6 million was used to fund OPUC.

Chapter 4. Service Population Demographics

Electric and telephone service is nearly universal in Texas. Therefore, approximately 25.7² million people, almost the entire population of Texas, are affected by the prices of electric and telecommunication products and services. Of the total population, there are over 8.9 million households.³ Additionally, there are over 2 million small business customers in Texas.² The ability for all residential and small commercial consumers to have access to affordable and reliable utility services constitutes a continuing challenge for policy makers. The agency is tasked to represent the interests of residential customers with affordability and reliability in mind. Furthermore, the agency must carry out its statutory mandate given that the Legislature has found that the production and sale of electricity and telecommunications are increasingly competitive activities.⁴ Creating, enhancing, and promoting competition through the application of appropriate market structures will be continuously important to ensure customers benefit from competition.

Retail electric competition was introduced in January 2002 to major market areas in Texas including Dallas, Houston, and South Texas. Texas is often deemed the most successful competitive electric market in the United States, if not the world, despite some challenges that have and will continue to be met and overcome. Most recently, increases to energy demand associated with a growing population and an expanding economy have caused generation capacity in the competitive market to be a concern. Changes to market rules are under consideration with the goal of incenting new generation resources to be built so that grid reliability is maintained. There continue to be major market areas not included in retail electric competition including San Antonio, Austin, El Paso, the Panhandle, and Southeast Texas. Full regulation of transmission and distribution facilities continues throughout all of Texas.

The PUC has noted that the telecommunications industry in Texas, as well as nationally, is undergoing rapid change. As technology and regulation change the telecommunications industry, its market participants respond by adapting in various ways. For example, new players enter the marketplace, others leave, and yet others merge or break up to meet the new challenges (and challengers). All parties adjust their product lines to compete. The result of this activity is the introduction of products (and retirement or disuse of others) that change the very face of the industry. In addition to technology-driven regulatory changes, public policy objectives also have been changing, resulting in an evolution in telecommunications regulations.

Competition in the telecommunications industry continues to develop, and much of the change has been driven by technological advances and investment in mobile and broadband technologies. Mobile wireless companies play an increasingly significant role in the competitive market in Texas, and cable television and non-facilities-based Internet-protocol providers have increased their market presence. The availability of broadband service at affordable prices, principally from local exchange companies and mobile wireless companies, has resulted in significant growth in the number of broadband subscribers in Texas.⁵

Chapter 5. Technological Developments

The Office of Public Utility Counsel utilizes the Texas Department of Information Resources (DIR) TEX-AN and Capitol Complex Telecommunications Services, which includes voice mail for all employees. Employees use desktop computers that are connected by local area network. Laptop computers are used by staff attending hearings and ERCOT meetings. The agency has internet service provided by DIR, an internal email system, and a website. Through these means, OPUC is able to effectively communicate with consumers, FCC, FERC, NERC, PUC, ERCOT, Texas RE and other state agencies. The agency utilizes its website as a way to communicate with consumers providing electric and telecommunication information.

Internet access continues to be a vital business tool for OPUC. Many valuable resources are now available online, and access to the Internet allows the agency real-time access to that information. For example, the agency downloads financial information on utilities, including FERC and U.S. Securities and Exchange Commission (SEC) financial forms, as well as annual reports. Both federal and state government agencies are also trending toward the elimination of paper by creating electronic alternatives. The *Texas Register* is currently available online, the PUC requires filings to be made electronically as well as by hard copy, and a majority of filings made at the FCC and FERC are filed only electronically. Governmental agency web pages also allow quick and easy access to important public notices, requests for comments, and other useful information. Communication technology enables agency employees to be more productive by allowing communication at any time of the day or night and for transmission of documents and other critical information.

Chapter 6. Economic Variables

Residential households and small businesses continue to face challenges due to economic conditions. Per capita household income in Texas fell in 2008 and 2009 in tandem with rising unemployment.⁶ Texas Gross Domestic Product fell from 2007 to 2008 and grew slightly from 2008 to 2009.⁷ Because utility service is a necessity, households and small businesses face difficult choices when attempting to balance utility bills with other spending. In those areas of the state with retail electric choice, it is increasingly important for consumers to evaluate the host of service plans available to them by the various providers to gain the benefits of choice in a competitive market. With respect to telecommunications services, consumers' options not only include the possibility of a change in service provider, but different service delivery technologies altogether.

OPUC fills a critical need during this time. Through its consumer information initiatives, OPUC helps customers shop for Retail Electric Providers and find providers of telecommunication services, promotes energy efficiency programs that reduce the cost of electric and telephone bills, provides information to consumers about low-income initiatives that help with bill payment, and assists utility customers with complaints about their service providers. OPUC also represents consumers' interests with respect to the price of utility services. The agency actively participates in litigated cases achieving bill savings for customers in cases where utility rates are regulated by the PUC.

Since 2009, OPUC has taken several steps to augment its consumer representation. The agency has enhanced its presence in the community by embarking on an information and communication plan to reach as many Texas customers as possible, speaking with them about their concerns, informing them about a variety of issues, and addressing their needs. Recently, OPUC has expanded its efforts to better serve its small business constituency. The agency is coordinating with groups representing these business owners to provide information and assistance on unique issues affecting small businesses. In 2011, the agency launched a military communication initiative working cooperatively with Texas military installations to bring the benefits of competition to Texas military personnel and their families, military retirees, veterans and civilians.

The agency's website was refreshed to include information about the agency's functions, how to shop for utility services, basics about electricity, energy efficiency material and contacts, transmission line proceeding participation information, and a children's page to help engage even the youngest utility consumers. The website features OPUC's quarterly newsletter designed to keep customers informed about market issues. The public may also go to the agency website and sign up for free "Consumer Alerts" to be sent to them by e-mail. These alerts provide consumers with timely information on a variety of issues impacting them, including energy conservation requests during severe weather events, rebate programs, agency publications, and customer protection issues. On the social networking front, the agency's Facebook and Twitter pages send information blasts to subscribers and gives consumers another forum for interaction and a choice as to how they would like OPUC to communicate with them. Most recently, OPUC launched a "Military Resource" page on its website to utilize in its

aforementioned ongoing statewide military communication efforts.

Although current economic indicators show that recovery is underway, there are still challenges facing customers. Reaching a high of 8.3 percent in December 2010, the unemployment rate in Texas has slowed and currently stands at 6.9 percent.⁸ GDP continues to grow. However, when these numbers are compared to data over the last five years, the recovery is slow. While the pressure on households and small businesses has relented somewhat, consumers continue to need a resource that helps them manage utility costs and participate in the utility market in an informed way.

OPUC anticipates that future conditions will call for intensified, rather than diminished, consumer representation. These changing conditions will require even more sophisticated representation, in addition to enhanced customer communication and information, as both industries' products and services become more complex. Moreover, the numerous policy issues which remain to be addressed regarding the future structures of both industries provide an opportunity to advocate competitive structures beneficial to all ratepayers. For electric utility services that are still regulated, OPUC's role in recommending and presenting proposals to regulators regarding cost reviews, recommended adjustments, and rate designs beneficial to residential and small business consumers will continue to be necessary; in competitive markets, OPUC's role in advocating for market structures, mitigation measures, consumer protections, and enhanced choices will also be critical for the agency's constituency.

Chapter 7. Other Legal Issues

The electric and telecommunications industries are dynamic and evolving industries because of technological innovation and the forces of competition. As such, the Public Utility Regulatory Act (PURA) is often amended during legislative sessions. These new laws are then subject to numerous rulemakings and docketed proceedings at the PUC to implement them. There were several issues that arose prior to and during the 82nd Regular Legislative Session (2011). Following are highlights of the legislative and PUC rulemaking processes which OPUC participated on behalf of its constituents:

- **Transmission Line Certificates of Convenience and Necessity (CCN) Cases.** The Legislature passed, and the Governor signed, Senate Bill (SB) 855, which allowed OPUC to serve as an advisory, neutral party to assist landowners on the procedural aspects of utility transmission line CCN cases.⁹ The PUC implemented the legislation in PUC Project No. 39518. The rule ensures that OPUC receives notice when utility transmission line CCN cases are filed with the PUC.¹⁰
- **Periodic Rate Adjustments.** The Legislature passed, and the Governor signed, SB 1693, which grants the PUC the authority to allow utilities, once a year, to implement an increase in rates to reflect changes in additional distribution investment, distribution-related costs, and associated taxes.¹¹ The PUC implemented the legislation in PUC Project No. 39465.¹²
- **Telecommunications.** Several telecommunications-related bills were passed during the 82nd Regular Legislative Session which required the PUC to establish rulemaking projects to implement the legislation:
 - *Conforming Rules.* While incumbent local exchange carriers (ILECs) have been deregulated since 1995, since that time, technology has changed. Consequently, many of the regulatory tools and requirements used to ensure competition are no longer needed. The 82nd Legislature recognized this and accordingly passed relevant legislation to eliminate outdated or unnecessary filing requirements, such as customer specific contracts, earning reports, tariffs, and extended area services.¹³ The PUC established, and completed a comprehensive rulemaking, PUC Project No. 39585, to conform its rules to the new law.¹⁴
 - *Universal Service Fund.* SB 980 required the PUC to initiate one or more proceedings to review and evaluate whether the Universal Service Fund (USF) accomplishes the fund's purposes or whether changes are necessary to accomplish those purposes.¹⁵ As part of these proceedings, the PUC may adjust the per-line support amounts needed by each telecommunications provider and may implement any other changes it determines necessary and in the public interest. Accordingly, the PUC has opened rulemaking PUC Projects No. 39937 and 39938 to address these issues.¹⁶ These rulemaking projects are currently in progress, and OPUC is actively participating.

- *Voice Over Internet Protocol (VoIP) Services.* The Federal Communications Commission (FCC) has extended federal universal service obligations to providers of interconnected VoIP services and has concluded that states could extend state USF assessments on the intrastate portion of interconnected VoIP. Consequently, the PUC has opened rulemaking PUC Project No. 39717 to implement this provision of SB 980 and to clarify whether the USF assessment is applied to VoIP-based services.¹⁷ This rulemaking is currently in progress, and OPUC is actively participating.

Chapter 8. Self-Evaluation and Opportunities for Improvement

OPUC views the strategic planning process as an opportunity to examine the role we play in Texas on a broad scale, taking into consideration the far-reaching vision and goals outlined in “Securing Our Future.” Through the strategic planning process, the agency identifies the fundamental tenets of its mission and philosophy and how to structure agency work to best bring value to its customers.

Because OPUC strives to maximize its resources in bringing value to its customers, the agency carefully considers the benefits it can achieve through participation in various forums. Accordingly, the agency currently considers several relevant consumer, market, and fiscal factors before participation in proceedings:

- Is there a demonstrable consumer interest at stake?
- What consumer benefits can be achieved?
- Does OPUC have a reasonable chance of success?
- What are the goals for participation?
- What time and costs will be necessary for the matter?
- What prior law or precedent is relevant to the matter?

Since filing the agency’s 2010 Strategic Plan, OPUC has identified areas where it can bring additional value to customers. Consequently, the agency has implemented a plan to enhance our representation and assistance for customers by augmenting its customer information and electronic media presence as discussed in Chapter 6.

OPUC’s current workforce is skilled and highly experienced in the industry. This has allowed the agency to operate very efficiently and effectively in its representation of customers. However, OPUC has identified this as a challenging area for the future, because while a significant portion of the agency’s workforce will be eligible for retirement in the near-term, the complex nature of the industry and the volume of the work itself are increasing. Because the competition for skilled individuals is significant in electric and telecommunications industries, the retention of qualified, experienced professionals is all that more important for the agency to succeed. This introspection will be helpful as the agency assesses its workforce needs and potential improvements for continuing to bring value to its customers in the future.

Part III. Agency Goals, Objectives, Outcome Measures, Strategies, Output Measures, Efficiency Measures, and Explanatory Measures

GOAL: To represent residential and small business consumers aggressively in electric utility matters to ensure that residential and small commercial customers benefit from competition and are protected during the transition to a more competitive market.

OBJECTIVE: To Promote Electric Customer Choices and Consumer Protection Policies and Achieve Reasonable Electric Bills.

Outcome Measures:

- Percentage of OPUC Electric Proceedings that are Competition Related
- Percentage of OPUC Electric Proceedings that are Related to Resource Planning and Acquisition
- Current Year Bill Savings for Residential and Small Commercial Electric Customers. (In Millions)
- Future Bill Savings for Residential and Small Commercial Electric Customers (in Millions)

STRATEGY: Participate in Electric Proceedings Involving Competitive/Customer Protection Issues or Impacting Consumers' Bills.

Output Measures:

- Number of Electric Cases in Which OPUC Participates
- Number of Electric Projects in Which OPUC Participates
- Number of Electric Court Cases in Which OPUC Participates

Efficiency Measure:

- Average Cost Per Electric Proceeding in Which OPUC Participates

Explanatory Measures:

- The average monthly price of electricity per kilowatt hour (kWh) for residential customers from regulated suppliers in Texas as a percentage of the national average cost of electricity for the same class of service

GOAL: To represent residential and small business consumers aggressively by providing comprehensive telecommunications analysis and representation at the Public Utility Commission, the FCC, and in state and federal courts to ensure that residential and small commercial consumers benefit from competition and are protected during the transition to a more competitive market.

OBJECTIVE: To promote fair state and federal rulings, customer choice in telecommunications providers and services, access to new or advanced technologies, and consumer protection policies such that fifty percent of the OPUC's telecommunications involvement relates to competition during each year of the biennium.

Outcome Measures:

- Percentage of OPUC Telecommunications Proceedings that are Competition Related
- Percentage of Proceedings in Which OPUC Participates that are State-Related

STRATEGY: Participate in telecommunications proceedings involving competitive issues/consumer safeguards or new and/or advanced technologies and services. Review and analyze information, present testimony, and submit legal pleadings in proceedings affecting residential and small business telecommunications customers.

Output Measures:

- Number of Telecommunications Cases In Which OPUC Participates
- Number of Telecommunications Projects in Which OPUC Participates

Efficiency Measure:

- Average Cost per Telecommunications Proceeding in Which OPUC Participates

Explanatory Measures:

- Average Annual Residential Telephone Bill in Texas as a Percentage of the National Average
- Average Annual Business Telephone Bill in Texas as a Percentage of the National Average

GOAL: We will establish and carry out policies governing purchasing that foster meaningful and substantive inclusion of historically underutilized businesses.

OBJECTIVE: We will include historically underutilized businesses in at least the percentages designated by the Comptroller of Public Accounts in its Annual Procurement Utilization Goals of the dollar value of all delegated purchases and contracts awarded annually by fiscal year 2015.

Outcome Measure:

- Percent of Total Dollar Value of all categories of delegated purchases and contracts awarded annually to HUBs.

STRATEGY: We will continue to expand and maintain a list of all certified HUB vendors and contractors by collecting updated information from the Comptroller of Public Accounts.

Output Measures:

- Number of HUBs Contractors Contacted for Bid Proposals
- Number of HUB Contracts Awarded
- Dollar Value of HUB Contracts Awarded

PART IV. Technology Resource Planning

Technology Initiative Assessment and Alignment

The Office of Public Utility Counsel (OPUC) will continue to strengthen and expand its capabilities to acquire and secure technology by participating in the State's Information and Communications Technology Cooperative contract program which leverages the State's purchasing power. The agency will continue to monitor and adapt to changing conditions to recognize and prevent security breaches. OPUC continues to make improvements through the website and other technologies to provide meaningful citizen engagement.

It is crucial for the agency to continually enhance its computer system as technology changes. Emerging technology issues will affect the achievement of the agency's goals. In Fiscal Year (FY) 2007, the agency entered into a DIR Seat Management agreement to provide maintenance for the agency's network, email and website, and to keep up with technology advances that can improve the efficiency and effectiveness of the agency. This has greatly improved the agency's capabilities in the area of automated security tools, including patch management, risk assessment, and incident reporting. In FY 2009, the agency leveraged DIR's resources to improve security of the agency's network and applications. DIR performed a penetration test on the agency's network and applications. The test resulted in only a few minor issues that the agency addressed. DIR will conduct a vulnerability assessment on the agency's network and website in 2012.

OPUC continues to improve its website, redesigned in 2010, to make OPUC's operations and information more transparent and available to the public. OPUC regularly updates and utilizes its website to ensure a more consumer-relevant and consumer-informative resource. A "Resource" page provides consumers information on their utility rights, protections, energy efficiency, transmission line case participation, and other helpful links. Information relating to PUC rule changes, legislation, and docketed proceedings affecting consumers are also provided as additional resources that have been incorporated into the agency's website and issued as "Consumer Alerts," to which consumers can subscribe via email on the agency website. The email alerts notify subscribers about a variety of issues, from market changes that affect them, such as retail electric provider consolidations, to time-sensitive emergency information. OPUC also began utilizing social media, including Facebook and Twitter, to send updates to consumers on important information and continues to use these forums to keep ratepayers informed. OPUC developed an agency quarterly e-newsletter and a page for children to learn about electricity. Electric and telephone customers can sign up through the OPUC website to receive the quarterly letter via email. Each newsletter includes timely, consumer-relevant information. A new military resource page provides OPUC publications, retail shopping information, and other tools for military personnel and their families, retirees, veterans and civilians. In addition to web improvements aimed at expanding agency communication with the public, a toll-free phone number (1-877-839-0363) was acquired, thereby providing the public increased access to agency services.

¹ OPUC's Public Counsel is an *ex-officio* non-voting member of the Texas RE Board of Directors (Texas RE Bylaws, Article IV, Section 1, Board of Directors; *see* <http://www.texasre.org/about/governance/membership/Pages/Default.aspx> -) and an *ex-officio* voting member of the ERCOT Board of Directors (PURA § 39.151(g)(2)).

² *See* <http://www.tsl.state.tx.us/ref/abouttx/census.html>.

³ This estimate is based on data from the United States Census Bureau (http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_SF1_GCTP4.ST13&prodType=table), where the number of households in Texas is reported at 8,922,933, and data from the U.S. Small Business Administration where the number of Texas small businesses is reported at 2.2 million (<http://www.sba.gov/advo/research/profiles/09tx.pdf>).

⁴ *See* Public Utility Regulatory Act (PURA) § 39.001 and PURA § 52.001, respectively.

⁵ *See PUC's Report to the 81st Texas Legislature: Scope of Competition in Telecommunications Markets in Texas* (Transmittal Letter) (January 2009).

⁶ Data taken from the U.S. Bureau of Economic Analysis. *See* http://www.bea.gov/iTable/index_regional.cfm

⁷ Data taken from the U.S. Bureau of Economic Analysis. *See* http://www.bea.gov/iTable/index_regional.cfm

⁸ Data taken from the Texas Comptroller of Public Accounts. *See* <http://www.thetexasconomy.org/economic-outlook/key-indicators/articles/article.php?name=tables#unemployment>

⁹ Public Utility Regulatory Act (PURA), as amended by SB 855, 82nd Regular Legislative Session (2011).

¹⁰ PUC Project No. 39518, *Rulemaking Related to Implementation of SB 855, Amending Proc. R. §22.52, Relating to Notice in Licensing Proceedings*, Final Order (November 1, 2011).

¹¹ Public Utility Regulatory Act (PURA), as amended by SB 1693, 82nd Legislative Session (2011).

¹² PUC Project No. 39465, *Rulemaking Related to Periodic Rate Adjustments*, Final Order (September 27, 2011).

¹³ Public Utility Regulatory Act (PURA), as amended by SB 980, SB 983, HB 2293, and HB 2680, 82nd Legislative Session (2011).

¹⁴ PUC Project No. 39585, *Rulemaking Proceeding to Amend Subst. Rules Relating to Telecommunications Service to Conform to 2011 Legislation*, Final Order (March 22, 2012).

¹⁵ Public Utility Regulatory Act (PURA), as amended by SB 980, 82nd Regular Legislative Session (2011).

¹⁶ PUC Project No. 39937, *Rulemaking to Consider Amending Substantive Rule §26.403, Relating to the Texas high Cost Universal Service Plan* and PUC Project No. 39938, *Rulemaking to Consider Amending Substantive Rule §26.403, Relating to the Small and Rural Incumbent Local Exchange Company (ILEC) Universal Service Plan*.

¹⁷ Public Utility Regulatory Act (PURA), as amended by SB 980, 82nd Regular Legislative Session (2011) and PUC Project No. 39717, *PUC Rulemaking Proceeding Related to Voice Over Internet Protocol (VoIP) Services and Texas Universal Service Fund (TUSF)*.

Appendix A

Agency Planning Process

Appendix A

Agency Planning Process

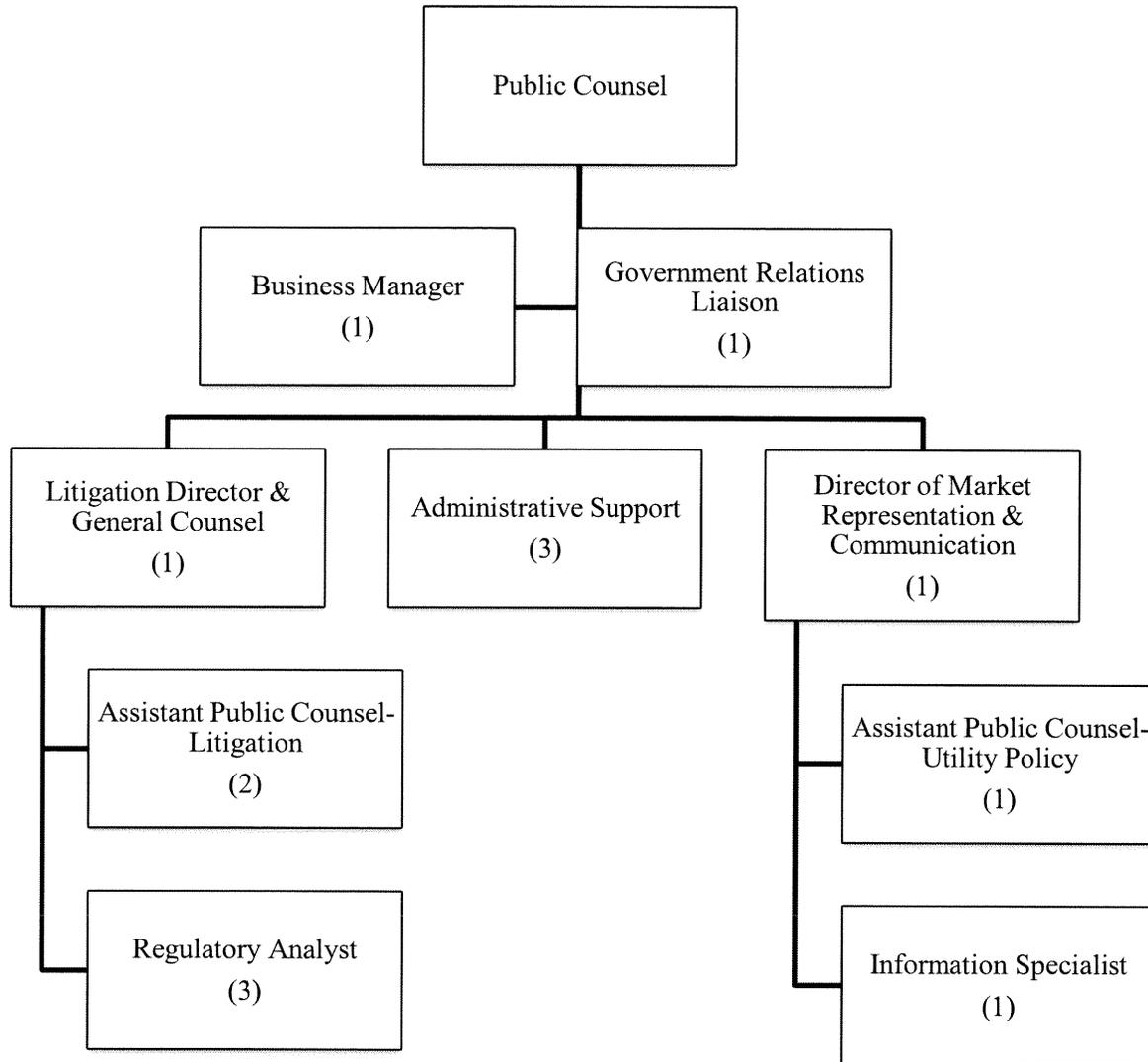
The Office of Public Utility Counsel (OPUC) received Agency Strategic Planning Instructions issued jointly from the Governor's Office of Budget, Planning and Policy and the Legislative Budget Board. These instructions were then distributed and reviewed by the Public Counsel, the Director of Litigation, Director of Market Representation, the Business Manager, and staff to determine if the agency's previous Strategic Plan continued to reflect projected work levels and goals.

It was determined that modifications would be made to ensure current issues were accurately reflected. The Public Counsel elicited input from staff members in order to update the Strategic Plan. After research and review, the final draft was completed. OPUC submitted its complete, revised Strategic Plan in July 2012.

Appendix B

Agency Organizational Chart

Office of Public Utility Counsel



Appendix C

Agency Projected Outcomes for 2013-2017

PUBLIC UTILITY COUNSEL

**OUTCOMES
2013 – 2017**

OUTCOME	2013	2014	2015	2016	2017
Percentage of OPUC Electric Proceedings that are Competition Related.	55%	55%	55%	55%	55%
Percentage of OPUC Electric Proceedings that are Related to Resource Planning and Acquisition.	4%	4%	4%	4%	4%
Current Year Bill Savings for Residential and Small Commercial Electric Customers (In Millions).	\$18 (m)				
Future Bill Savings for Residential and Small Commercial Electric Customers (In Millions).	\$0 (m)				
Percentage of OPUC telecommunications proceedings that are competition related.	65%	65%	65%	65%	65%
Percentage of proceedings in which OPUC participates that are state-related.	65%	65%	65%	65%	65%

Appendix D

Performance Measure Definitions

APPENDIX D
Performance Measure Definitions

Strategy: Participation in Electric Proceedings

Outcome Measure:	Percentage of OPUC Electric Proceedings that are Competition Related.
Short Definition:	The term “competition proceedings” includes OPUC workload which addresses issues such as customer choice in electric providers and services, headroom issues, market power, and consumer protection policies.
Purpose/Importance:	The electric industry is moving toward a competitive retail industry. As such, the agency workload will be best measured by the percentage of total proceedings that are competition related.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC determines the number of total electric proceedings in which it participates. OPUC divides this number into the number of electric competition proceedings in which OPUC actually participates.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Outcome Measure:	Percentage of OPUC Electric Proceedings that are Related to Resource Planning and Acquisition.
Short Definition:	The term “Resource Planning and Acquisition proceedings” includes OPUC workload which addresses issues such as renewable energy requirements, energy efficiency goals, energy portfolio issues and transmission planning.
Purpose/Importance:	SB7 instituted certain statewide goals and mandates related to resource planning and acquisition. The agency will actively pursue these requirements through the most cost-effective means possible.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC determines the number of total electric proceedings in which it participates. OPUC divides this number into the number of electric resource planning and acquisition proceedings in which OPUC actually participates.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Outcome Measure:	Current Year Bill Savings for Residential and Small Commercial Electric Customers (in Millions).
Short Definition:	Bill savings measure the impact on residential and small commercial customer’s bills. Different types of proceedings result in rate adjustments on customers’ bills such as rate increases/decreases, surcharges, refunds, incentives, mark-ups, transition charges, and fuel charges.
Purpose/Importance:	OPUC will participate in proceedings to ensure the maximum bill savings on residential and small commercial customers’ bills. This measure will quantify the impact in the current year for participation in the current year’s proceedings on a state-wide basis.
Source/Collection of Data:	OPUC records.
Method of Calculation:	<p>OPUC calculates the bill savings as the difference between a requested amount for a rate adjustment and the amount actually approved, for the current fiscal year. Bill savings should include only residential and small commercial, Industrial and transportation customers will be removed using information from the U.S. Department of Energy.</p> <p>Impact on industrial and transportation customers will be separated out using the most recently available information from the U.S. Department of Energy. The calculation is based on using one of the following: national retail sales of kilowatt hours, state retail sales of kilowatt hours, or state retail revenue earned by all electric companies that sell electricity in Texas. In addition, information from the U.S. Department of Energy should be used to calculate a three year average moving for residential and small commercial market sector to minimize the fluctuation in the market.</p>
Calculation Type:	Cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Outcome Measure:	Future Bill Savings for Residential and Small Commercial Electric Customers (in Millions).
Short Definition:	Future bill savings measure the impact on residential and small commercial customers' bills. Different types of proceedings result in rate adjustments on customers' bills such as rate increases/decreases, surcharges, refunds, incentives, mark-ups, transition charges, and fuel charges.
Purpose/Importance:	OPUC will participate in proceedings to ensure the maximum bill savings on residential and small commercial customers' bills. This measure will quantify the impact in future years for participation in the current year's proceedings on a state-wide basis.
Source/Collection of Data:	OPUC records.
Method of Calculation:	<p>OPUC calculates the bill savings as the difference between a requested amount for a rate adjustment and the amount actually approved, for bill savings from Stranded Cost Cases. Future year's savings calculation should not include any savings to consumers in the current year.</p> <p>Bills savings should only include residential and small commercial, Industrial and transportation customers will be removed using information from the U.S. Department of Energy.</p> <p>Impact on industrial and transportation customers will be separated out using the most recently available information from the U.S. Department of Energy. The calculation is based on using one of the following: national retail sales of kilowatt hours, state retail sales of kilowatt hours, or state retail revenue earned by all electric companies that sell electricity in Texas. In addition, information from the U.S. Department of Energy should be used to calculate a three year average moving for residential and small commercial market sector to minimize the fluctuation in the market.</p>
Calculation Type:	Cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Output Measure:	Number of Electric Cases in Which OPUC Participates.
Short Definition:	OPUC intervenes in electric cases which have the most significant impact on residential and small commercial electric customers in Texas. "Cases" include tariffs and docketed proceedings.
Purpose/Importance:	This measure quantifies the number of electric cases in which OPUC participates. Many significant issues are presented as tariffs or docketed proceedings. OPUC actively participates in these cases on behalf of residential and small commercial ratepayers.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC uses a manual count of all electric cases in which OPUC actually participates.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Output Measure:	Number of Electric Projects in Which OPUC Participates.
Short Definition:	OPUC participates in electric projects which have the most significant impact for residential and small commercial electric customers in Texas. "Projects" include rulemaking proceedings and generic projects.
Purpose/Importance:	Many significant issues are decided through projects at the PUC. Currently, the entire electric market is being restructured in large part through these projects. OPUC participates in these projects on behalf of residential and small commercial customers.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC uses a manual count of all electric projects in which OPUC actually participates.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Output Measure:	Number of Electric Court Cases in Which OPUC Participates.
Short Definition:	OPUC participates in court cases in which electric matters are litigated. OPUC can participate in court either as the petitioning party, as an intervener, or as an <i>amicus curiae</i> . In many instances, OPUC performs two roles in the same case.
Purpose/Importance:	This measure quantifies the number of electric court cases in which OPUC participates. Many significant issues are litigated in the court system. OPUC actively participates in these cases on behalf of residential and small commercial ratepayers.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC uses a manual count of electric court cases in which OPUC actually participates.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Efficiency Measure:	Average Cost Per Electric Proceeding in Which OPUC Participates.
Short Definition:	Average cost per electric proceeding.
Purpose/Importance:	This measure provides a guide as to the average cost per proceeding. The amount determined will be higher if longer or more complex proceedings are more common. It will be lower if shorter or less complex proceedings are more common.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC calculates the hourly rate for each attorney and technical staff and multiplies that hourly rate by the individual time spent on each case. The sum of all attorney and technical time is then divided by the total number of electric proceedings in which OPUC participates. Outside expert witness contracts are included in this calculation.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Lower than target.

Explanatory Measure:	Avg Price of Elec/kWh in TX for Residential Customers from Regulated Suppliers as a % of the National Avg.
Short Definition:	This measure represents the average monthly price of electricity per kilowatt hour (kWh) for residential customers from regulated suppliers in Texas as a percentage of the national average cost of electricity for the same class of service.
Purpose/Importance:	The purpose of this measure is to show whether Texas residential electricity prices per kWh are higher or lower than the national electricity prices per kWh for residential service.
Source/Collection of Data:	Public Utility Commission of Texas.
Method of Calculation:	Detailed procedures for calculating this measure are maintained by the Public Utility Commission of Texas.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Performance that is at or below target is desirable.

Strategy: Telecommunications Proceedings

Outcome Measure:	Percentage of OPUC telecommunications proceedings that are competition related.
Short Definition:	The term competition "proceedings" includes OPUC workload which addresses customer choice in telecommunications providers and services, access to new and advanced technologies, and consumer protection policies.
Purpose/Importance:	The telecommunications industry is regulated in a competitive framework. As such, OPUC workload is best measured by the percentage of total proceedings that are competition related.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC determines the number of total telecommunications proceedings in which it participates. OPUC divides this number into the number of telecommunications competition proceedings in which OPUC participates.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Outcome Measure:	Percentage of proceedings in which OPUC participates that are state-related.
Short Definition:	This calculation will yield the percentage of OPUC's telecommunications workload which is state in nature.
Purpose/Importance:	As the federal government takes on a more active role in the telecommunications industry, more of the agency workload will involve federal proceedings. This measure quantifies the amount of workload that is state-related.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC will divide the number of state-related telecommunications proceedings in which OPUC participates by the number of all telecommunications proceedings in which OPUC participates.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Output Measure:	Number of Telecommunications Cases in Which OPUC Participates.
Short Definition:	OPUC intervenes in telecommunications cases which have the most significant impact for residential and small commercial telephone customers in Texas. "Cases" include tariffs and docketed proceedings.
Purpose/Importance:	This measure quantifies the number of telecommunications cases in which OPUC participates. Many significant issues are presented as tariffs or docketed proceedings. OPUC actively participates in these cases on behalf of residential and small commercial ratepayers.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC uses a manual count of all telecommunications cases in which OPUC actually participates.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Output Measure:	Number of Telecommunications Projects in Which OPUC Participates.
Short Definition:	OPUC participates in telecommunications Projects which have the most significant impact for residential and small commercial telephone customers in Texas. "Projects" include rulemaking proceedings and generic projects.
Purpose/Importance:	Many significant issues are decided through projects at the PUC. OPUC participates in these projects on behalf of residential and small commercial customers.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC uses a manual count of all telecommunications Projects in which OPUC actually participates.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Higher than target.

Efficiency Measure:	Average Cost per Telecommunications Proceeding in which OPUC participates.
Short Definition:	Average cost per telecommunications proceeding.
Purpose/Importance:	This measure provides a guide as to the average cost per proceeding. The amount determined will be higher if longer or more complex proceedings are more common. It will be lower if shorter or less complex proceedings are more common.
Source/Collection of Data:	OPUC records.
Method of Calculation:	OPUC calculates the hourly rate for each attorney and expert witness and multiplies that hourly rate by the individual time spent on each case. The sum of all attorney and technical time is then divided by the total number of telecommunications proceedings in which OPUC participates. Outside expert witness rates and expenses are included in this calculation.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	Lower than target.

Explanatory Measure:	Average Annual Residential Telephone Bill in Texas as a Percentage of the National Average.
Short Definition:	This measure reports the average annual residential telephone bill in Texas as a percentage of the national average residential telephone bill. The term “bill” is defined as the weighted average monthly rate for single-line residential telephone service.
Purpose/Importance:	The purpose of this measure is to show whether Texas residential telephone bills are increasing or decreasing in comparison to the national average telephone bill.
Source/Collection of Data:	Public Utility Commission of Texas.
Method of Calculation:	Detailed procedures for calculating this measure are maintained by Public Utility Commission of Texas.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	A performance percentage that is at or below the target is desirable.

Explanatory Measure:	Average Annual Business Telephone Bill in Texas as a Percentage of the National Average.
Short Definition:	This measure reports the average annual business telephone bill in Texas as a percentage of the national average telephone bill. The term “bill” is defined as the weighted average monthly rate for single-line business telephone service.
Purpose/Importance:	The purpose of this measure is to indicate whether business telephone bills in Texas are increasing or decreasing in comparison to the national average business telephone bill.
Source/Collection of Data:	Public Utility Commission of Texas.
Method of Calculation:	Detailed procedures for calculating this measure are maintained by the Public Utility Commission of Texas.
Calculation Type:	Non-cumulative.
New Measure:	No.
Desired Performance:	A performance percentage that is at or below the target is desirable.

Appendix E

Agency Workforce Plan

Office of Public Utility Counsel's Workforce Plan

The mission of the Office of Public Utility Counsel (OPUC) is to provide quality representation, pertinent information, and valuable customer assistance by skilled professionals in an efficient manner to Texas residential and small business telephone and electric utility customers in appropriate state and federal regulatory, judicial, and market-based venues to ensure abundant utility services are available to them at just and reasonable rates in an increasingly competitive environment.

The agency will continue to need a gender/age/racially mixed workforce comprising attorneys, technical experts, and support and administrative staff. OPUC anticipates that it will need the same structure that it has now. In an increasingly competitive environment, recruiting and retaining adequate talent will be a challenge given current resources and benefits.

OPUC's current workforce profile is as follows:

Position, Age, Gender, Race, Tenure, Projected Turnover in Next 5 Years

2 Administrative Positions:

Age Range: 35 – 58 years old
Gender: Female (2)
Race: White (2)
Tenure: 9 – 39 years
Retirement: 0 are eligible for retirement in the next 5 years
Projected Turnover in Next 5 Years: 0

10 Professionals:

Age Range: 33 – 61 years old
Gender: Female (6) Male (4)
Race: White (10)
Tenure: 2 – 26 years
Retirement: 4 are eligible for retirement in the next 5 years
Projected Turnover in Next 5 Years: 0

3 Administrative/Support Staff:

Age Range: 39 – 54 years old
Gender: Female (3)
Race: White (0) Hispanic (3) African-American (0)
Tenure: 2 – 21 years
Retirement: 0 is eligible for retirement in the next 5 years
Projected Turnover in Next 5 Years: 0

Each employee currently has workforce skills critical to the mission and goals of the agency.

Workforce Planning Goals:

- Continue to issue merit raises where appropriate
- Continue to offer flexible work schedules whenever possible and requested
- Continue to offer additional training when possible
- Continue to encourage formal and informal communication among all employees on all aspects of the agency's functions
- Continue to use outside sources for recruitment when necessary