

MEMORANDUM

State of Alaska
Department of Administration
Division of Personnel and Labor Relations

To: Nicki Neal Director	Date: March 1, 2010
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Subject: 2009 Regulatory Commission of Alaska (RCA) Classification Study

Preamble

In September of 2008 the Department of Commerce, Community and Economic Development (DCCED), Regulatory Commission of Alaska (RCA), submitted a study request for Communications Common Carrier Specialist I-IV, Consumer Protection and Information Officer (APUC) I-II, Utility Engineering Analyst I-V, Utility Financial Analyst I-IV, and Utility Tariff Analyst I-III job class series.

The study request followed the legislature's adoption of Legislative Resolve #11, which created a legislative task force to study RCA staffing levels, position classifications, and salary assignments for the RCA's exempt and classified staff. The Task Force met twice in January of 2008, and in the same month recommended by written report that a classification study be undertaken and that a salary review be performed to address RCA's concerns about its classified staff. Subsequently, DCCED made the RCA Study its top Classification priority, and the Division of Personnel and Labor Relations (DOPLR) agreed to conduct the study.

The role of study lead was assigned to a studies analyst in late December, 2008. On August 21, 2009, the original study lead departed State service, at which point the Class Studies Supervisor took over the responsibilities of study lead and assigned another studies analyst to assist her with the completion of the study. In November of 2009 Classification began to circulate draft class specs for RCA's review and comment. Final versions of the class specifications were distributed to RCA in January of 2010.

Study Scope

The following job classes are included in this study:

- Communications Common Carrier Specialist I-IV
- Consumer Protection and Information Officer (APUC) I-II
- Utility Engineering Analyst I-V
- Utility Financial Analyst I-IV
- Utility Tariff Analyst I-III

Study Contacts

Classification's primary study contact at RCA was the Commission Section Manager. The Advisory Section Manager and the DCCED Administrative Services Director both served as secondary contacts.

The study planning meeting was held on February 9, 2009, at the RCA office in Anchorage with the Class Studies Supervisor and the original study lead, the RCA Chair, the Immediate Past Chair, Commission Section Manager, Advisory Section Manager, and appropriate RCA section heads all present. The RCA Chair and Immediate Past Chair provided information about the RCA and illustrated the concerns that prompted the study request. The scope of the study was established and formal presentations were made by the section heads, detailing the work of their staff, changes to the work over time, and current issues and challenges.

Desk audit interviews with the incumbents of all filled positions covered by the study were conducted by the original study lead and the Class Studies Supervisor during the second week of February, 2009. Examples of work were provided by the RCA, via CD, to the original study lead the third week of March, 2009.

History of Job Classes

With the exception of the Communications Common Carrier Specialists, the study classes have not been substantively reviewed since the Alaska Public Utilities Commission (APUC) study of 1980 and the DOPLR Rewrite of that study in 1981.

Communications Common Carrier Specialist

Chief, Communications Bureau (APUC), established December 1, 1976, was re-titled as Communications Common Carrier Specialist in the 1980-81 APUC Study and Rewrite. Effective June 16, 2002, three additional Communications Common Carrier Specialist job classes were added to complement the existing job class, which became the third level of the new series, to create the current four-level series.

Consumer Protection and Information Officer (APUC)

Consumer Protection and Information Officer (APUC) I and II were established as part of a three-class series, effective February 7, 1977. The series was restructured from three levels to the current two by the 1980-1981 APUC Study and Rewrite.

Utility Engineering Analyst

Utility Engineering Analyst II, III, IV, and V (then titled Utility Engineering Analyst I, II, III, and IV, respectively) were established effective June 16, 1973. Utility Engineering Analyst I was established, effective December 14, 1981, and the numerical titles of the existing four levels changed to their current state, Utility Engineering Analyst I-V, by the APUC Study Rewrite.

Utility Financial Analyst

Utility Financial Analyst III and IV were established July 29, 1968, as the first and second levels of a two-level series. Utility Financial Analyst I and II were established July 25, 1969, to create the current series structure of Utility Financial Analyst I-IV.

Utility Tariff Analyst

Utility Tariff Analyst I, II and III were established effective September 1, 1980.

Class Analysis

The State's classification plan provides for the grouping of positions into job classes when they are sufficiently similar with respect to duties and responsibilities, degree of supervision exercised and received, and entrance requirements so that: 1) the same title can be used to clearly identify each position; 2) the same minimum qualifications for initial appointment can be established for all positions; 3) the same rate of basic pay can be fairly applied to all positions; and 4) employees in a particular class are considered an appropriate group for purposes of layoff and recall. Job classes should be constructed as broadly as is feasible as long as the tests of similarity are met.

The RCA is responsible for regulating the provision of utility, pipeline and communications services in Alaska by reviewing and certifying qualified providers of public utility and pipeline services to ensure they provide safe and adequate services and facilities at just and reasonable rates, terms, and conditions to consumers in Alaska. For the purposes of the many bodies of work that fall within the broad scope of this study's review, Classification considered the regulatory responsibilities assigned to each of the five RCA Study subject series, or 18 job classes, as being divided into three separate but occasionally overlapping bodies of work: one to review and certify pipelines and utilities, one to review and certify communications carriers, and one to address and resolve consumer complaints regarding utility service and to facilitate consumer outreach.

The Utility Engineering Analysts, Utility Financial Analyst, and Utility Tariff Analyst series represent the first body of RCA work that falls within the scope of this study. Even though these series share responsibility for utility and pipeline advisory reviews, they are not appropriately grouped together into a single job class series because each of the three handles a separate component of this review. Each review component requires proficiency in a different professional discipline, and proficiency in each discipline is developed through different paths of

education and experience. Consequently, the Utility Financial Analyst, Utility Engineering Analyst, and the Utility Tariff Analyst series remain separate.

Classification's review of the Utility Engineering Analyst series finds positions in this series perform or supervise an engineering review function within the RCA by evaluating a proposed or regulated utility's willingness and ability to provide service, the convenience and necessity of such service, the reasonableness of engineering and operating expenditures in rate proceeding cases, and the continuing quality of service.

The structure created in the 1980-1981 APUC Study and Rewrite established two entry level classes to precede the journey-professional level of this series. This study reveals that incumbent development within this series is adequately addressed by a single entry level; subsequently, the first entry level of the series is abolished resulting in a series with one each of the entry professional, journey professional, advanced professional, and supervisory professional levels.

Positions in the Utility Financial Analyst series perform or supervise duties involving utility regulatory audit, financial examination, and analysis of prospective or existing regulated and non-regulated utility and pipeline companies and provide subsequent recommendations to the RCA regarding the utilities' and pipeline carriers' financial fitness, revenue requirements, rate design, cost allocation methodology, and rate structure reasonableness.

The work of this series is still appropriately divided into four levels, but Classification finds the first level is not accurately described as a trainee level. Trainee levels are customarily added to a job class series when an incumbent's standard training period, typically as defined in a written training plan, will routinely exceed the job class's standard probationary period. Since the Utility Financial Analyst I job class is not associated with a defined training program that will normally exceed the one year probationary period, and because there is also a considerable amount of line-work assigned to positions in this job class, the first level of the Utility Financial Analyst series is now entry/developmental, and subsequent levels of this four-class series are journey professional, advanced professional, and supervisory professional.

Positions in the Utility Tariff Analysts series perform and/or supervise detailed and technical analysis of proposed tariff filings submitted by regulated utilities and provide subsequent recommendations to the RCA. This study finds the work of this series is still appropriately divided into three levels: entry professional, journey professional, and supervisory professional.

The Communications Common Carrier Specialists class series represents the second body of RCA work relevant to this study. Positions in this series recommend, develop, administer, and supervise policies and programs regarding the regulation of major communication carriers within the state. This work requires incumbents to apply a professional-level understanding of finance, tariffs, and engineering to provide the same level and scope of review for communications carriers as Utility Engineering Analysts, Utility Finance Analysts, and Utility Tariff Analysts work together to address for utilities and pipeline companies.

Classification's review of the structure of this series found the duties and responsibilities attributed to the series and each of its four levels (entry professional, journey professional, advanced professional and supervisory professional) still accurately describes the poly-discipline professional work assigned to classes within the series. No change to the series title or its class structure is recommended.

Consumer Protection and Information Officers (APUC) represent the third body of RCA work that falls within the scope of this study. Classes in this series perform and supervise investigations of complaints filed by customers or prospective customers of public utilities regarding the services, rates, charges, and facilities of public utilities; participate in public outreach and education initiatives; make recommendations and advise the RCA concerning the sufficiency of utility services and the reasonableness and propriety of utility rules and practices; counsel utility customers on procedures for obtaining utility services and for resolving disputes with utilities; and furnish information to the public regarding the status of utility and pipeline proceedings before the Commission and the effect of Commission decisions in those proceedings.

The Consumer Protection and Information Officer (APUC) job class series consists of two classes, one at the entry level and one at the advanced/supervisory level. Skill gaps of this sort, where to engage in upward career movement within a series an incumbent would have to move from the entry level to the advanced/supervisory level, are unique in the State classified service, and do not bode well for encouraging career service within a class-series. With this issue in mind, the RCA requested that Classification research the feasibility of adding a third class to encompass a journey level body of work within the series and facilitate a more conventional and career-friendly series construction. Classification does not identify a need to add an additional level to this series, but does find that the majority of the work in the Consumer Protection section is of average difficulty, is routinely and regularly performed by the first level of the series, and requires a broad understanding of utility consumer-related issues; subsequently, the first level of this series is now identified as the journey professional, rather than entry professional, level of the series. The second-level of the series remains advanced/supervisory professional.

Class Title

A class title should be the best descriptive title for the work. It is intended to concisely and accurately convey the kind and level of work performed and should be brief, easily recognized, gender neutral, and understood by potential applicants.

Communications Common Carrier Specialist I, II, III, and IV remain the appropriate titles for this series and continue unchanged.

Consumer Protection and Information Officer (APUC) I and II have been updated to Consumer Protection and Information Officer I and II (RCA).

Utility Engineering Analyst I, II, III, and IV titles are retained, but now refer to what was previously identified as Utility Engineering Analyst II, III, IV, and V.

Utility Financial Analyst I, II, III, and IV and Utility Tariff Analyst I, II, and III continue unchanged, as the existing titles remain appropriate descriptors for the work performed.

Minimum Qualifications

The minimum qualifications established for a job class must relate to the knowledge, skills, and abilities needed to perform the work and must not create an artificial barrier to employment of individuals in protected classes. Required training should be limited to the basic formal training that customarily prepares individuals for work in the field. Experience requirements are intended to ensure new employees can successfully perform the work after a period of orientation or familiarization. Required experience should be directly related to the actual duties of positions in the class and should not be equivalent to the work to be performed.

Classification made changes to some of the subject class's minimum qualifications by providing additional qualifying paths of experience, increasing the technical requirements of education qualifications, reducing accompanying experience requirements, and increasing the amount and variety of educational paths to qualification. All changes were made to increase the effectiveness of recruitment efforts and to promote career development and incumbent retention within individual series.

Class Code

A class code is assigned based on the placement of the job class in the classification schematic of Occupational Groups and Job Families. Occupational Groups are made up of related Job Families and encompass relatively broad occupations, professions, or activities. Job Families are groups of job classes and class series that are related as to the nature of the work performed and typically have similar initial preparation for employment and career progression.

Utility Financial Analyst

During the discovery phase of this study, RCA Advisory Section management and Finance Section staff advocated their concern about the Utility Financial Analyst series' job class family placement; their position is this series would be more appropriately placed in the Revenue and Audit Family (PC05) rather than its current placement in the Business Regulation and Compliance Family (PC02). This concern rises from the perceived similarity between Utility Financial Analysts and Oil and Gas Revenue Auditors.

Job Families consist of job classes and class series that are related as to the nature of the work performed. The nature of the work includes the kind of work performed as shown by such elements as the subject matter, profession, or occupation. Typically, for all job classes in a family, initial preparation for employment is similar and the classes exhibit a logical relationship for career progression. Job classes within a Job Family are treated similarly for purposes of personnel administration.

The Business Regulation and Compliance Family (PC02) includes those job classes that perform duties related to the regulation, including financial regulation, of business and occupational licensing. In this case regulation can be understood as meaning anything designed to control, direct, or govern according to a rule, principle, or system.

The Revenue and Audit Family (PC05) includes those job classes that advise on, administer, supervise, or perform work related to tax and revenue assessment, auditing, and collection.

When Classification assigns a class series to a particular family, it considers both the immediate nature and the broader intent and impacts of the work performed by positions in the series to determine the type of work being performed. Utility Financial Analysts clearly perform audits of complex financial structures as a major component of their primary duty, but the larger mandate for their work stems from the fundamental mission that guides the parent department.

The most fundamental attribute of DCCED's statutory mandate is its responsibility to facilitate the enforcement of state laws designed to regulate business as a means to protect consumers from unfair business practices. The RCA is an active arm of the Department's regulatory mandate and performs work designed to protect the public from unfair utility business practices by regulating the activities of utilities. Utility Financial Analysts perform an audit function for the RCA that enables the Commission to make informed judgments on whether a utility's business activities fall within State and federal regulatory limits, and to recommend corrective actions for the RCA to impose on utilities that operate outside of regulatory limits.

If Utility Financial Analysts performed financial audits as a means of collection for State revenue, or as a means of verifying the accuracy of calculations used to determine payments of tax debts to the State, then Classification would change the family placement of this series; however, as Utility Financial Analysts perform audits as a regulatory function and not as a means of collection or determination of tax requirements, the series remains placed in the Business and Regulation Compliance family, PC02.

Utility Engineering Analysts

The Utility Engineering Analysts are in Job Family PK03 Engineering, Unlicensed within the PK Physical Sciences and Engineering job group.

This family includes classes of positions that advise on, administer, supervise, or perform engineering work that does not require a Professional Engineer license. This includes work in engineering specialties such as civil engineering, environmental engineering, or utility engineering. Initial preparation for employment is typically through advanced education in engineering with subsequent career progression based on progressively responsible experience and specialized education.

PK03 continues to be the appropriate placement for Utility Engineering Analysts in the Classification Outline.

Class codes, and family placement, for the Communications Common Carrier Specialist, Consumer Protection and Information Officer (RCA), and Utility Tariff Analyst series also remain unchanged.

AKPAY Code

AKPAY codes are assigned to job classes for use in legacy computer systems that cannot use the six-digit Class Codes. AKPAY codes remain unchanged for all 17 subject classes.

Fair Labor Standards Act (FLSA)

Work is exempt under Section 13(a)(1) of the Fair Labor Standards Act, as Amended (FLSA), from the Act's minimum wage and overtime requirements, when it meets at least one of the criteria under either the executive exemption set forth in subpart B, the administrative exemption set forth in subpart C, or the professional exemption set forth in subpart D.

While exemption from the provisions of the FLSA are determined based on the specific circumstances of an individual employee on a work-week basis, there are general aspects of this study's subject classes and their influence on the exemptions for employees in bona fide executive, professional, or administrative positions that can be addressed in general terms.

Classification's review of the FLSA status of this study's subject classes reveals changes to six position's overtime eligibility are appropriate.

PCN 086030, Utility Financial Analyst II, and PCN 086026 and PCN 086042, both Utility Financial Analysts III, and PCN 086070, Communications Common Carrier Specialist II, all meet the criteria set forth in the FLSA for the professional exemptions. These positions meet the general salary requirement and they perform work that requires knowledge of an advanced type in a field of science or learning customarily acquired by a prolonged course of specialized intellectual instruction such as engineering, finance, and accounting. The minimum qualifications for each of these classes allow for non-education-based substitution qualification, but that does not reduce the notion that professionals in these fields normally acquire their knowledge through a prolonged course of specialized intellectual instruction.

The above referenced PCNs and PCN 086064 and PCN 086004, Utility Tariff Analysts II, all meet the FLSA requirements set forth under the administrative exemption. These six positions meet the salary requirement, and perform as a primary duty office or non-manual work directly related to the management or general business operations of the employer or the employer's customers. FLSA, Section 541.201(b), includes "research" in its list of work that qualifies under the administrative exemption. These six PCNs work in the RCA Advisory Section to research the validity of claims made by utilities, through structural and statement reviews, regarding the suitability of their financial well-being, adherence to established and approved tariff structures, or their engineering infrastructure, and then make recommendations to the RCA regarding suitable regulatory action, when necessary.

In addition to their direct research and recommendation responsibilities, each of these six positions maintains responsibility for the more obvious administrative responsibilities associated with the work, such as managing dockets by scheduling case appearances before the regulatory Commission, then providing notice of Commission decisions through letter orders and public notices.

Incumbents of these PCNs may only recommend regulatory action to a higher-level position, and not directly to the RCA, but this does not preclude their Administrative exemptions. The FLSA requires positions that positions meeting the administrative exemption must “exercise discretion and independent judgment with respect to matters of significance.” While the FLSA, Section 541.202(a), defines acting with discretion and independent judgment as involving “the comparison and evaluation of possible courses of conduct, and acting or making a decision after the various possibilities have been considered,” in Section 541.202(c) it clarifies that “the decisions made as a result of the exercise of discretion and independent judgment may consist of recommendations for action rather than the actual taking of action.”

As a result of meeting the terms of the professional or administrative exemption, or a combination of both, PCNs 086030, 086026, 086042, 086070, 086004, and 086064 are no longer eligible for overtime.

Salary Alignment

The salary range of a job class is determined based on internal consistency within the State’s pay plans, in accordance with merit principles, with the goal of providing fair and reasonable compensation for services rendered and maintaining the principle of like pay for like work. In evaluating internal consistency, the difficulty, responsibility, knowledge, skills, and other characteristics of a job are compared with job classes of similar nature, kind, and level in the same job family and occupational group or related job families.

To evaluate the salary alignment of Communications Common Carrier Specialist I-IV, Consumer Protection and Information Officer (RCA) I-II, Utility Financial Analyst I-IV, and Utility Tariff Analyst I-III, Classification compared the class-controlling characteristics of job classes within these series against the defining characteristics of other job classes in the Business Regulation and Compliance (PC02) job family and, when necessary, to job classes in larger Business Development and Regulation (PC) job group. To evaluate the salary alignment of Utility Engineering Analyst I-IV, Classification compared the class-controlling characteristics of job classes within the series against the defining characteristics of other job classes in the Engineering, Unlicensed (PK03) job family.

The classification factors applied in this analysis originate from the State’s Whole-Job Classification system. They are:

- the nature and complexity of the work (i.e., the range of duties and different kinds of work, the nature of guidelines used, the difficulty in identifying what needs to be done, and the originality required in performing the work);
- the nature and extent of control of the work exercised by supervisors and guidelines;
- the resourcefulness or ingenuity required to solve problems and the extent to which the work requires deviations from standard practices;
- the purpose of, and authority in, person-to-person contacts outside the supervisory chain;
- the types of cases, problems, or questions in which decisions, conclusions, or recommendations are made, the nature and timing of reviews, the likelihood of error by a prudent employee, and the impact of errors on the program, organization, or the public; and
- the nature of supervision exercised over subordinates and the size, complexity, and variety of functions in the subordinate unit.

Communications Common Carrier Specialist I-IV

Communications Common Carrier Specialists apply professional knowledge of engineering, finance, and economics to recommend, develop, administer, and supervise policies and programs designed to facilitate State regulation of communications carriers. At the entry/developmental professional and journey professional levels of the series incumbents apply knowledge of State regulations to the review and articulation of a State regulatory position in cases under State jurisdiction; the advanced and supervisory levels perform more complex reviews and articulate the State's regulatory position in cases where jurisdiction is shared by the State and the Federal Communications Commission; in all cases positions must defend their regulatory determinations in a public, quasi-judicial environment where policy and regulatory statements are likely to be cross examined. Positions in this series also make recommendations for State regulatory policy when case circumstances warrant expanded regulation.

The Communications Common Carrier Specialist classes are unique among RCA's skilled-professional classes. Other professional class series at the Commission, like Utility Engineering Analyst, Utility Financial Analyst, and Utility Tariff Analyst, work together to complete a comprehensive evaluation of a utility or pipeline provider operating in the State, each applying skill in a single professional discipline like engineering, finance, or tariff structures and rate making to its part of the evaluation. When it comes to RCA's review of communications carriers, classes in the Communications Common Carrier Series perform all of the review components for that industry that are otherwise divided among Utility Engineering Analyst, Utility Financial Analyst, and Utility Tariff Analyst for the review of utility and pipeline companies. This comprehensive review requirement means that incumbents of the Communications Common Carrier Specialist series must apply skills in engineering, finance, and tariff structures and rate-making to their regulatory review, rather than just one professional skill like other RCA classes. This poly-disciplinary knowledge requirement increases the complexity associated with this generalist professional series.

Other skilled professional series in the PC02 family, like Insurance Analyst and Securities Examiner, perform regulatory work similar to that of the Communications Common Carrier

Specialist classes, but, like the other RCA classes mentioned above, they do so by applying skills from a single professional discipline. The resulting differences in complexity between the generalist Communications Common Carrier Specialist series and other single-discipline regulatory series in the PC02 family suggests comparison with another generalist regulatory class is best for alignment purposes.

The Public Advocate Utility Analyst I-II is a generalist regulatory series that compares well to Communications Common Carrier Specialist; positions in the Public Advocate Utility Analyst I-II series apply advanced knowledge in multiple professional disciplines such as finance, engineering, and business administration to the review and articulation of State regulatory positions, with regard to a utility, to be presented publicly in a quasi-judicial forum where they may be subject to cross examination. Similarities between the series include their generalist work in utility regulation, their responsibility to make determinations that are defensible against cross examination, and their responsibility to make well-developed recommendations for new State regulatory policy whenever the situation warrants.

In the 2006 Public Advocate Utility Analyst Class Study, Classification cited the same similarities between the two classes when it aligned the Public Advocate Utility Analyst I class to the advanced level Communications Common Carrier Specialist III to set the Public Advocate Utility Analyst I at SR-22. The similarities identified between the two classes here, and in the 2006 study, support continued alignment between the Communications Common Carrier Specialist III and Public Advocate Utility Analyst I, and the alignment of Communications Common Carrier Specialist III to SR-22.

The 2006 study also aligned Public Advocate Utility Analyst II with Communications Common Carrier Specialist IV at SR-23. In 2007 Classification amended the 2006 Public Advocate Utility Analyst salary placement and aligned the class to SR-24, but did not overrule the 2006 study's assertion that the two classes are comparable for alignment purposes. This study finds the two classes continue to be good comparables because of their generalist nature, their supervisory responsibility over other professional generalists that perform similar regulatory duties, and their ultimate responsibility over one of the State's industry-specific regulatory functions; subsequently, Communications Common Carrier Specialist IV is set at SR-24. Setting Communications Common Carrier Specialist I and II at SR-18 and SR-20, respectively, supports the State's goal of structuring job class series in a manner that facilitates career growth within a series and corresponds with the aggregate characteristics of both ranges.

Consumer Protection and Information Officer (RCA) I-II

Consumer Protection and Information Officers (RCA) perform and supervise investigations of complaints filed by prospective customers of public utilities regarding the services, rates, charges, and facilities of public utilities; participate in or facilitate public outreach and education initiatives; make recommendations to the RCA regarding the sufficiency of utility services and the reasonableness and propriety of utility rules and practices; counsel utility customers of procedures for obtaining utility services and for resolving disputes with utilities; and furnish information to the public concerning the status of utility and pipeline proceedings before the

Commission and the effect of Commission decisions on in those proceedings. Consumer Protection and Information Officers (RCA) I work at the journey level of the series and primarily analyze and investigate utility and pipeline industry consumer complaints, provide assistance on outreach and education efforts, and provide support to higher-level positions in the coordination of formal Commission proceedings. At this first level of the series the pertinent issues of consumer complaint investigations are readily identified, and resolution is likely to be obtained through informal mediation between the consumer and the utility. Positions in this class also perform a low-complexity market surveillance function for the RCA and are thus charged with recognizing negative trends in utility business practices and making higher-level positions aware so regulatory action can be considered by the Commission.

The Consumer Service Specialist (Insurance) class (SR-16) is in the PC02 family and receives, analyzes, and resolves inquiries and complaints from insurance consumers concerning the insurance industry and its practices in Alaska, while keeping a market-surveillance-style awareness of industry trends compares well to Consumer Protection and Information Officer (RCA) I. Positions in both classes receive complaints from consumers, evaluate the merits of the complaint against either service-contracts or tariff agreements, investigate applicable laws and regulations, analyze how laws and regulations substantiate or disprove the complaint, and contact company representatives in an effort to mediate a resolution for the consumer when merited.

At SR-16 one also finds second-developmental level professional classes, classes that investigate wage hour violations, classes that certify child care facilities and investigate allegations of regulatory non-compliance, and classes that perform advanced paraprofessional supervisory duties. All the professional classes at SR-16 share levels of responsibility similar to the Consumer Protection and Information Officer (RCA) I: they handle individual cases of lower complexity in a series where at higher levels determinations may affect state regulatory policy, and influence the quality and availability of various commercial services available to Alaskan consumers. The Consumer Protection and Information Officer (RCA) I class's similarities to the aggregate characteristics of SR-16 in the PC02 family, generally, and its stark similarity to the Consumer Service Specialist (Insurance) class specifically, suggest realignment of Consumer Protection and Information Officer (RCA) I from SR-14 to SR-16.

The most comparable class to the Consumer Protection and Information Officer (RCA) II is the Consumer Service Supervisor (Insurance) (SR-18), also in the PC02 family. Positions in both classes respond to the most complex consumer complaints; both are responsible for providing information to the public regarding substantial changes to industry practices through direct public outreach, web-accessible public notices, and media relations; both respond to requests for information from the public, industry, and other agencies; and both supervise professional consumer protection staff. The duties performed by these classes are in line with the advanced supervisory professional work one expects to find at SR-18.

While the class-controlling work performed by Consumer Protection and Information Officer (RCA) II requires the application of substantial industry knowledge, many of the position's duties are primarily administrative in nature and do not facilitate the kind of substantial managerial responsibility and programmatic authority associated with SR-20. Insurance Analyst

IV (SR-20) is a good example of the substantial managerial responsibilities associated with SR-20. This class is charged with applying proficiency in a complex professional field to manage a statewide regulatory function through subordinate professionals, and acts as a market-wide consultant on the broad technical aspects of a complex regulated industry. Consumer Protection and Information Officer (RCA) II does not compare as well to Insurance Analyst IV and the aggregate characteristics of SR-20 in the PC02 family as it does to Consumer Service Supervisor (Insurance) and the aggregate SR-18 characteristics found in PC02.

In 1981 the APUC Study and Rewrite salary alignment placed significant importance on the Consumer Protection and Information Officer (APUC) role as media liaison, and subsequently compared the job class outside of the PC-02 family to Information Officer III (SR-20), option a. Information Officer III is either a) responsible for the public information and publicity duties of a department whose activities and programs are highly controversial, b) is a full supervisor over a departmental information section that includes at least two lower-level Information Officers, or c) a single position which serves as the designated representative for the State's Public Health Preparedness Program. This study finds that the Consumer Protection and Information Officer (RCA) II class's responsibility for media relations is merely a product of its class-controlling work in the field of consumer protection; the class is not responsible for all the public information duties at the RCA, and is not directly responsible for media relations regarding issues in the RCA's parent department. Additionally, most public notices and Commission orders bypass the Consumer Protection section and are made available to the public by RCA staff outside of the Consumer Protection section. This sort of intermittent involvement with an agency's public and media relations work is not the type that defines either Information Officer III or the Information Officer series in general. Subsequently, Consumer Protection and Information Officer (RCA) II does not compare accurately to Information Officer III in the most substantial and defining areas of both class's work.

Consumer Protection Information Officer (RCA) I is set at SR-16 and Consumer Protection and Information Officer (RCA) II is set at SR-18 based on both class's alignment to the characteristics of those ranges within the PC02 family.

Utility Tariff Analyst I-III

Utility Tariff Analysts perform and/or supervise detailed and technical analysis of proposed tariff filings submitted by regulated utilities and provide subsequent recommendations to the RCA. Journey professional Utility Tariff Analysts II independently perform duties associated with proposed tariff advice filings that may contain complex or controversial issues or require substantial research in areas where precedent or guidelines have not been clearly established. At the journey level of the series, regulatory determinations may require presentation to the Commission in a public setting where the incumbent is required to defend their conclusions.

Insurance Analysts perform duties that are appropriately similar to Utility Tariff Analysts for the sake of alignment comparisons. At the journey level, Insurance Analyst III (SR-18) reviews and either approves or disapproves policy forms, rates, and the rating systems, which are similar to tariff structures, used or proposed for use by insurers; participates in or independently conducts

studies that analyze factors affecting the availability and stability of the insurance markets including regulatory matters, policy forms, rates and practices of insurers and insurance producers; and testifies to present and defend findings and division policies before legislative committees in administrative and other regulatory proceedings, and occasionally in a formal judicial setting.

Insurance Analyst III is typical of journey classes aggregated to SR-18 in the PC02 family: the class acts with relative independence in matters that affect large groups of consumers and service providers, while applying a substantial and complex body of professional knowledge made more complex by the monetary and political implications of the class's regulatory decisions. SR-18 also aggregates advanced working supervisors of programs and staff that apply a more limited body of knowledge to meet a state regulatory mandates, such as Consumer Service Supervisor (Insurance), and regional supervisors over complex state regulatory programs, such as Wage-Hour Investigator II.

The three-range separation between classes in the Utility Tariff Analyst class series is a product of the salary alignment methodology applied in 1980-1981 APUC Study and Rewrite. That study compared the Consumer Protection and Information Officer (RCA) series, then consisting of three classes, to the three-class Information Officer series and subsequently imposed the Information Officer series' three-range separation between classes on the Consumer Protection and Information Officer (APUC) series. The study alignment then compared the Consumer Protection and Information Officer (APUC) series, based on loosely defined comparables, to the Utility Tariff Analyst series and as such transferred the same three-range separation between classes to the Utility Tariff Analyst series to maintain parity between what that study determined to be similar classes. Today Classification takes great pains to avoid comparing subjects of the same study to each other, and instead opts to base a subject series' construction and alignment on non-subject comparables in the same job family, whenever possible, because of the inherent advantages a two range structure lends to recruitment and retention as described below.

Today's standard for setting range differences between classes in a series is illustrated by the Insurance Analyst series, which consists of an entry-developmental professional level, a second-developmental professional level, a journey professional level, and a supervisory-advanced professional level, each set at SR-14, SR-16, SR-18, and SR-20, respectively. This two-range separation between classes is indicative of the State's need to facilitate career growth within a series and provide a compelling increase in pay between classes to support retention; it is the standard applied to professional level job class series unless a two-range separation does not correspond with the relevant family's aggregate range characteristics. In light of these methodological changes, classes in the Utility Tariff Analyst series should be set two ranges apart as long as classes in the series compare well at those ranges.

SR-16 of the PC02 family aggregates classes that perform advanced supervisory paraprofessional work, second-level developmental work in a complex state regulatory program, or journey work in regulatory fields where the focus is on the protection of individual rights through either the enforcement of labor laws or consumer protection mechanisms. Journey-level Utility Tariff Analysts I work in a field where knowledge requirements are made more complex

by the wide variety of services offered by the regulated industries and the correspondingly diverse regulatory policies that positions must apply to their regulatory review. Utility Tariff Analysts I review basic tariff structures where the review falls within the scope of available guidelines, and where regulatory advice is not likely to affect state policy. At this level, assignments are designed to prepare incumbents for work in a field where the journey-level class is likely to recommend that the State take a course of regulatory action that has significant financial impact on both the Alaska utility industry and Alaskan consumers, and where recommended actions must be presented and defended in a quasi-judicial environment. The defining characteristics of the Utility Tariff Analyst I conform with the aggregate traits of SR-16.

At SR-20 in the PC02 family one finds working supervisors over complex State regulatory functions, such as Insurance Analyst IV, where the predominantly applied body of knowledge is complex and professional but does not meet the same tests of complexity as a class that applies specific professional accounting or engineering skills to its regulatory work. Like Insurance Analyst IV, Utility Tariff Analyst III supervises a State regulatory section, handles the most complex cases, defends its positions publicly, and represents the pinnacle of a similarly complex career path.

Utility Tariff Analyst I, II and III are set at SR-16, SR-18, and SR-20, respectively.

Utility Financial Analyst I-IV

Utility Financial Analysts perform or supervise duties involving utility/pipeline regulatory audit, financial examination, and analysis of prospective or existing regulated and non-regulated utility and pipeline companies, and provide subsequent recommendations to the RCA regarding the utilities' and pipeline carriers' financial fitness, revenue requirements, rate design, cost-allocation methodology, and rate-structure reasonableness. At the journey level of the series, Utility Financial Analyst II performs the full range of financial audit and examination duties typical of the class. At this level incumbents independently plan, prepare, and implement the audit, review, and analysis of Power Cost Equalization, tariff, and rate-case filings. The fundamental characteristic of this work is the class's assessment of the financial fitness and structure of a utility that seeks to or is operating in Alaska, the rendering of determinations on whether a utility's fitness and structure satisfies the State's regulatory requirements, and the provision of subsequent recommendations to the certifying regulatory body.

The journey-level Insurance Financial Examiner I (SR-19) fills a similar regulatory role at the State by performing detailed financial examinations for insurance industry cases of average complexity. Similar to the Utility Financial Analyst II, these reviews are performed to assess the financial fitness of insurance providers and to determine whether their financial structure and activities support certifying them for operation in the State. Both classes share similar responsibility, act with similar authority, and require similar knowledge to perform similar financial regulatory functions for the State.

Similarities between the classes extend to the series as well. Insurance Financial Examiner II (SR-21) and Utility Financial Analyst III both plan and perform financial reviews of the most

complex cases, act as a resource to lower-level analysts, and keep supervisors aware of observed trends in the market that may affect the State's regulatory efforts. Both the Insurance Financial Examiner III (SR-23) and Utility Financial Analyst IV supervise teams of finance professionals, handle the most complex cases, and serve as the State's expert in their respective regulatory fields.

Securities Examiners I-II (SR-21 and SR-22) also perform financial examination duties to facilitate State regulation of a market, but the securities market is fundamentally more complex and requires a greater scope of regulatory and finance knowledge at the journey level than one finds associated with either the Utility Financial Analyst or Insurance Financial Examiner series.

Within the PC02 job family, Utility Financial Analyst I-IV compares most succinctly to Insurance Financial Examiner I-III. Insurance Financial Examiner I-III is set at SR-19, 21 and 23, respectively; subsequently, the similarities between the series suggest setting Utility Financial Analyst I-IV at SR-17, SR-19, SR-21, and SR-23, respectively, is appropriate, but this comparison cannot be considered conclusive without a brief look at how Utility Financial Analysts compare to similar classes outside the PC02 family.

One issue that surfaces when comparing classes from PC02 to classes from PC05 is that job classes assigned to the PC05 family have a two range market-based-pay increase and job classes assigned to PC02 do not. Market-based-pay adjustments are not considered in salary alignment comparisons; rather, Classification makes class alignment comparisons using each comparable job class's base range, or their pre market-based-pay range placement. Once a class's base range is established through the alignment comparison process, applicable market-based-pay adjustment to a class's range is then included in the published range assignment found on the public class specifications. Subsequently, ranges noted for comparable job classes in this alignment do not reflect market-based-pay adjustments for which those classes may be eligible.

The Tax Auditor series in the PC05 job family consists of four levels: a first-training professional level, a developmental professional level, a journey professional level, and an advanced professional level. At the journey level, Tax Auditor III (SR-18) either leads tax revenue audits of small less complex tax programs or assists a supervisor with managing one or more of the small, less complex excise tax programs administered by the state. The audit work assigned to this class requires fairly standard accounting skills when compared to the journey level Utility Financial Analyst II responsibility to apply specialized knowledge of utility industry financial structures to their regulatory reviews. Even though both of these journey class's responsibilities are limited to audits of average complexity within their own fields, the complexity associated with specialized utility industry financial reviews suggests a slightly higher alignment for the journey Utility Financial Analyst II. This same difference in complexity extends to a comparison of the entry and advanced classes in each series and would justify a similar higher range placement for the entry Utility Financial Analyst I and the advanced Utility Financial Analyst III over the second-entry level Tax Auditor II (SR-16) and advanced Tax Auditor IV (SR-20).

Like the Tax Auditors, the Oil and Gas Revenue Auditor series in the PC05 job family also consists of four levels: a first-trainee professional level, a developmental professional level, a journey professional level, and an advanced professional level. At the journey level, incumbents allocated to Oil and Gas Revenue Auditor III (SR-20) apply complex professional knowledge and experience to accurately perform the full range of auditing duties for medium size oil and gas audits, or work as part of a team when assigned components of the largest oil and gas company audits. The duties assigned to Oil and Gas Revenue Auditor III have professional elements in common with the work of Utility Financial Analyst II, but when considered as a comprehensive body of work their comparison is subject to the same sort of complexity differential as one faces when comparing Tax Auditors to Utility Financial Analysts: requiring a class to exercise specific knowledge of the oil and gas industry is given more weight than requiring specific knowledge of the utility industry. The oil and gas industry's fundamental importance to the State, and specifically the need to accurately collect revenue from the State's oil and gas production, is historically given more weight than responsibility in other areas when aligning positions to a salary range. The increased weight given to oil and gas revenue associated duties stems from the potential repercussions of a mistake in a job class's work – should an Oil and Gas Revenue Auditor miscalculate revenue calculations the State may see an unanticipated and crippling deficit in operating funds and other repercussions that might affect all Alaskans; a mistake made by a Utility Financial Analyst does hinder the State's effort to protect Alaskan's from unfair business practices through industry regulation, but will not hinder the State's financial ability to operate as an enterprise. The end-result of this difference is that Utility Financial Analyst II, and the other levels of the series, align at a slightly lower range than the Oil and Gas Revenue Auditor classes.

A comparison of the Utility Financial Analyst series to both the Tax Auditor and the Oil and Gas Revenue Auditor series results in a Utility Financial Analyst salary placement that falls exactly one range higher than corresponding levels of the Tax Auditor series, and one range lower than corresponding level of Oil and Gas Revenue Auditor series. Neither the Tax Auditor nor the Oil and Gas Revenue Auditor series have a section manager or supervisory level that compares well to Utility Financial Analyst IV, and the Utility Financial Analyst series does not have a trainee level that compares well to Tax Auditor I (SR-14) and Oil and Gas Revenue Auditor I (SR-16). To align these classes one has to start with the journey and advanced levels, a method which suggests the journey Utility Financial Analyst II aligns to SR-19 and the advanced Utility Financial Analyst III aligns to SR-21 – with this method each subject class is aligned one range above corresponding levels within the Tax Auditor series and one range below corresponding levels in the Oil and Gas Revenue Auditor series. In the interest of maintaining a series that promotes positive recruitment at the entry level, and promotes career growth from the advanced to the supervisory levels, the comparison for the journey and advanced levels of the series extends to suggest alignment of Utility Financial Analyst I to SR-17 and Utility Financial Analyst IV to SR-23 is appropriate.

Based on comparison to classes in the PC02 and PC05 job families, the final range assignments for Utility Financial Analyst I-IV are SR-17, SR-19, SR-21, and SR-23, respectively.

Utility Engineering Analyst I-IV

Utility Engineering Analysts perform or supervise an engineering review function for the RCA by evaluating a proposed or regulated utility's willingness and ability to provide service, the convenience and necessity of such service, the reasonableness of engineering and operating expenditures in rate proceeding cases, and the continuing quality of service.

There are 17 job classes in the PK03 Engineering, Unlicensed family. Out of those 17, five are represented by the Utility Engineering Analyst series; of the remaining twelve classes, eight are primarily oriented to design work rather than the subject class's regulatory review functions. The remaining four, Environmental Engineering Assistant I-II and Environmental Engineering Associate I-II, perform a mix of regulatory review and project management work. Environmental Engineering Assistant I-II is a developmental series designed to prepare incumbents for movement to a higher-level series like Environmental Engineering Assistant and as such does not compare well to the subject series. Subsequently, the Environmental Engineering Assistant I and II are the most appropriate to compare to the subject class for alignment purposes.

The journey-level Environmental Engineering Associate I (SR-20) performs duties that lie somewhat in between the work of the journey and advanced levels of the Utility Engineering Analyst series. Positions allocated to this class perform professional environmental engineering duties that require the application of knowledge of the principles, methods, and techniques of engineering concerned with the facilities and systems for controlling pollution and protecting the quality of resources and environment. The work requires an understanding and utilization of aspects of chemistry, biological sciences, and public health that pertain to the control or elimination of pollutants. This class's primary role is part regulatory, in that positions review plans for compliance with environmental law and State permitting requirements, and part project management when positions manage environmental projects for communities whose resources do not permit the procurement of these services from private industry. Since pollution issues can manifest themselves in many different ways, positions in this class are required to maintain proficient skills in this broad scope of knowledge that includes familiarity with construction techniques, commercial manufacturing and processing methods, and the mitigation and measurement of pollution in all of those areas.

Environmental Engineering Associates I perform almost the full scope of duties in the field, with the exception of the most complex such as cases where new policy and regulations may result or that require the negotiation of unusually high levels of public scrutiny or political sensitivity—this is where the class looks most like Utility Engineering Analyst II. On the other hand, positions in this class work under closer direction than the advanced level Utility Engineering Analyst III, and in that regard more closely resemble Utility Engineering Analyst II.

The advanced supervisory Environmental Engineering Associate II (SR-22) is, under option one, a statewide consultant in environmental engineering work or, under option two, a supervisor of at least one Environmental Engineer I or Environmental Engineering Associate and two other professional staff. In both cases positions in this class identify the need for, and assist in, crafting new state regulations and environmental policy. Most positions allocated to the advanced supervisory Utility Engineering Analyst IV class perform duties that are similar to both options one and two of the Environmental Engineering Associate II. In addition, Utility Engineering

Analysts publicly defend the most complex and contentious of their cases in a quasi-judicial forum; subsequently, the work of the Utility Engineering Analyst IV is slightly more complex, and requires the incumbent bear responsibility for a broader scope of actions associated with greater consequences of error, than Environmental Engineering Assistant II.

The work of Utility Engineering Analyst II aligns slightly below Environmental Engineering Analyst I and results in a range placement of SR-19; the work of Utility Engineering Analyst III aligns above the Environmental Engineering Analyst I and below the supervisory Environmental Engineering Analyst II, and results in a range placement of SR-21; and Utility Engineering Analyst IV aligns slightly above Environmental Engineering Analyst II and results in a range placement at SR-23. Utility Engineering Analyst I, the entry level of the subject series, performs at a level meant to facilitate natural career transition to the journey level, and is subsequently set two ranges below Utility Engineering Analyst II at SR-17. After applying the PK03 Family market-based pay adjustment to the series, Utility Engineering Analyst I-IV is set at SR-18, SR-20, SR-22, and SR-24.

Conclusion

The 2009 RCA Study included a review of 18 job classes used solely by the RCA. Classification reviewed these job classes with the goal of updating the work assigned to these classes, aligning the updating classes with the State's pay plan according to merit principles, and making job class series structural changes wherever necessary to promote practical class series structures and incumbent notions of feasible career advancement within a series.

Classification's review of the 18 subject classes results in the following changes:

Communications Common Carrier Specialist IV range changed from SR-23 to SR-24.

Consumer Protection and Information Officer (APUC) I-II title changed to Consumer Protection and Information Officer (RCA) I-II.

Consumer Protection and Information Officer (RCA) I is changed from entry to journey level class and the range changed from SR-14 to SR-16.

Consumer Protection and Information Officer (RCA) II range changed from SR-20 to SR-18.

Utility Engineering Analyst I is abolished and Utility Engineering Analyst II-V class titles are changed to Utility Engineering Analyst I-IV; range assignments for Utility Engineering Analyst I-IV remain SR-18, SR-20, SR-22, and SR-24, respectively.

Utility Tariff Analyst I range changed from SR-14 to SR-16.

Utility Tariff Analyst II range changed from SR-17 to SR-18.

No changes were made to the Utility Tariff Analyst III range assignment.

Specifications for the remaining job classes were updated with no change to range or series structure.

The revised job classes are effective August 16, 2010.

Correspondence on the allocation of individual study positions is being distributed through the Online Position Description (OPD) system.

Attachments:

Final class specifications

Allocation spreadsheet

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