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MISSOURI PUBLIC SERVICE COMMISSION
COMMISSION STAFF DIVISION
OPERATIONAL ANALYSIS DEPARTMENT
CONSUMER & MANAGEMENT ANALYSIS UNIT

SURREBUTTAL TESTIMONY

OF

LISA A. KREMER

KANSAS CITY POWER & LIGHT COMPANY
KCP&L – GREATER MISSOURI OPERATIONS

CASE NO. EC-2015-0309

Jefferson City, Missouri
December 18, 2015

**** Denotes Highly Confidential Information ****

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KCP&L GREATER MISSOURI OPERATIONS COMPANY

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- 1 • Demonstrate that the Allconnect matter does not lend itself to the quantitative
2 measurement of customer satisfaction that KCP&L-GMO purport but is a
3 qualitative matter regarding whether or not KCP&L-GMO's practice of
4 transferring customer calls and customer information to Allconnect without
5 customer consent is appropriate and in the best interest of their customers.
- 6 • Demonstrate that Allconnect is not needed to verify KCP&L-GMO customer
7 information and the materiality of corrections actually made by KCP&L-GMO
8 are de minimus.
- 9 • Demonstrate the true ** _____ **¹ nature of the manner in which
10 KCP&L-GMO is transferring customer calls and data to Allconnect and using
11 the confirmation number as enticement.
- 12 • Demonstrate the critical role of listening to actual customer call recordings and
13 their confirmation of the ** _____ ** nature in the call transfers.
- 14 • Demonstrate that Allconnect personnel are in no way "surrogate" KCP&L-
15 GMO trained utility call center representatives and should not be investigating
16 and responding to KCP&L-GMO customer complaints required by 4 CSR 240-
17 13.040(2)(A).
- 18 • Demonstrate why KCP&L-GMO does not need to replace the data verification
19 role it alleges Allconnect plays should the KCP&L-GMO and Allconnect
20 relationship terminate because its trained utility call center representatives
21 successfully performed this function for decades as do all regulated utilities in
22 the state of Missouri.
- 23 • Demonstrate why the GPES, KCPL-GMO and Allconnect relationship is in
24 violation of Commission Affiliate Transactions Rule 4 CSR 240-20.015(2)(C).

25 **MS. JEAN A. TRUEIT REBUTTAL:**

26 Q. Does Staff agree with the statement by Ms. Trueit on page 2, line 17 of her
27 rebuttal testimony that "the Company's contact center relationship with Allconnect is
28 beneficial for both the Company's customers and the Company itself from a customer service
29 perspective, and specific information related to the quality of customer service provided by
30 the Company?"

¹ File No. EW-2013-0011 Company Response to Staff Data Request No. 47A. **

** to describe one type of customer complaint regarding Allconnect.

1 A. No, with regard to the impact on KCP&L-GMO's customer service to
2 KCP&L-GMO customers. Central to Staff's concerns with the KCP&L-GMO's practices of
3 transferring calls made by customers to connect and transfer electrical service are the
4 operational practices of first, not requesting customer consent before transferring customer
5 calls and customer information to Allconnect including information regarding the customers'
6 unique circumstance of relocating. Second, the customers are not efficiently provided their
7 utility service confirmation numbers but are transferred to Allconnect to be given the
8 customer confirmation number. Third, the utility customer also is not informed that his/her
9 call, customer data and unique circumstance of relocating or moving is being sold to
10 Allconnect by KCP&L-GMO for ** ____ ** and that such money is supporting KCP&L-
11 GMO's non-regulated operations.

12 Q. Does Staff's investigation in the current case support Ms. Trueit's statement on
13 page 3, lines 16 through 17 of her rebuttal testimony which states that "Contact center
14 operations partnered with Allconnect to execute on the Company's ongoing strategy for
15 improving customer satisfaction?"

16 A. No. Staff's investigation into KCP&L-GMO's utilization of Allconnect during
17 the approximate two and one-half years since Staff began its investigation demonstrates that
18 the primary interest Of KCP&L-GMO is for "non-regulated net margin,"² convenience to
19 KCP&L-GMO and support for Allconnect's interests.³ KCP&L-GMO's actions and Staff's
20 review of documentation indicate KCP&L-GMO's stated desire to enhance customer
21 satisfaction, if in fact true, are subordinate to its desire to grow revenue and earnings. I will
22 further argue subsequently in my testimony that KCP&L-GMO's assertion that Allconnect's

² Report of Staff's Investigation, File No. EO-2014-0306; File No. EW-2013-0011 Company Response to Staff Data Request No. 45.

³ File No. EW-2013-0011 Company Response to Staff Data Request No. 45.

1 data verification function is necessary is not necessary and does not result in material finding
2 of errors that in anyway justifies the Company's transfer of calls to Allconnect.

3 As described in the "Report of Staff's Investigation" in File No. EO-2014-0306 and
4 attached to the Staff's Complaint there are two types of Allconnect models or ways in which
5 customer calls may be transferred from the utility customer service representative to the
6 Allconnect customer service representative: These models are: 1) the "customer-consent"
7 model or Transfer Model and the 2) "no-customer consent" model or Confirmation Model.
8 As stated in the Staff report, KCP&L-GMO customer service representatives do not request
9 customer consent to transfer calls to Allconnect customer service representatives and instead
10 they use the "no-customer consent" (Confirmation Model). KCP&L-GMO customer service
11 representatives do not provide utility customers with confirmation numbers (generated by
12 systems and processes of KCP&L-GMO) as they once did but, instead forward such customer
13 information (customer identification number, customer order number, customer name, service
14 address, and start service date) and confirmation numbers to Allconnect customer
15 service representatives to later give to the utility customer to allow Allconnect to market
16 non-regulated services to the captive utility customer.⁴

17 The confirmation number and verification of information for the start service date is
18 enticement⁵ used by KCP&L-GMO and Allconnect to make customers believe they must be
19 transferred in order to receive assurance that they will have electric service on the day
20 arranged with the KCP&L-GMO customer service representative. The confirmation number
21 is the "tracking source" of the service commitment and provides means of clearly
22 communicating with KCP&L-GMO if anything needs to be changed or if something goes

⁴ File No. EC-2015-0309 Company Response to Staff Data Request No. 4.

⁵ File No. EW-2013-0011 Company Response to Staff Data Request No. 47A. **

** to describe one type of customer complaint regarding Allconnect.

1 awry on the day the connection of service is to occur. Staff considers the practices being
2 utilized by KCP&L-GMO involving lack of customer consent and notice to the Commission
3 when there is a Statute and Commission Rule covering customer service are in violation of
4 these rules. Staff also believes giving the profits from the sale of customer data, customer
5 calls, and the customer's situation of being engaged in moving to the unregulated operations
6 of KCP&L-GMO to be improper and inappropriate.

7 A significant amount of information has been reviewed during Staff's investigation
8 into the Company's statements of pursuing the relationship it has with Allconnect to enhance
9 "customer satisfaction." All study results presented by the Company in both its testimony and
10 in data request responses demonstrate various levels of customer dissatisfaction with the
11 Allconnect experience and/or have a negative opinion of KCP&L-GMO for transferring their
12 calls. Survey results fluctuate but all demonstrate some level of customer dissatisfaction and
13 some provide indication of significant dissatisfaction. Staff believes, however, that the
14 Allconnect issue does not best lend itself to quantitative analysis (the measurement of
15 customer satisfaction) but rather is a qualitative matter (is what the Company is doing right
16 and in the best interest of its utility customers?).

17 Both Allconnect and KCP&L-GMO conduct customer satisfaction surveys regarding
18 the Company's utilization of Allconnect. While the Company's rebuttal seems to be pointing
19 toward improvements in the degrees of customer dissatisfaction, Staff argues that no customer
20 satisfaction survey results demonstrate that the Company's practices of transferring and
21 selling customer calls and data without customer permission and withholding customer
22 service confirmation numbers to be non-detrimental to customers.

1 Q. Did KCP&L-GMO use a request for proposal/invitation for bid process to
2 locate Allconnect?

3 A. No. In response to Staff Data Request No. 27 in Case No. EO-2015-0309,
4 KCP&L-GMO responded:

5 There was not an RFP used in the selection process for the services
6 that Allconnect provides for KCP&L, KCP&L-GMO. There are
7 no suppliers substantially similar to Allconnect or with the track
8 record and utility experience that Allconnect has.

9 There is no other utility entity in Missouri presently utilizing Allconnect.⁶

10 Q. What does Staff know about the peer utilities Ms. Trueit mentions on page 3,
11 line 18 of her rebuttal testimony?

12 A. On August 15, 2013, KCP&L-GMO met with Staff in Jefferson City at the
13 Commission's Offices regarding KCP&L-GMO's decision to "partner" with Allconnect.
14 KCP&L-GMO made a presentation and had a 13 page document comprising the printed slides
15 of the presentation, which was provided to the attendees. On the second page of the slide
16 presentation is a heading entitled "research performed" under which the second bullet point
17 states: "Contacted 3 current utility partner references: Ameren, Xcel Energy and Nipsco."
18 Staff Submitted in File No EW-2013-0011 Staff Data Request No. 42 which stated "Of all
19 three companies contacted for references (Ameren, Xcel, and Nipsco) please provide any and
20 all documentation received by KCP&L as part of the Company's comprehensive research,
21 including but not limited to the documents detailing the references' experiences, as referenced
22 on page 2 of KCP&L's August 15th 2013 presentation to Staff." KCP&L-GMO responded:
23 "KCP&L did not receive any documentation from the three companies contacted for
24 references. They were one on one phone conversations." Staff subsequently requested "all

⁶ File No. EC-2015-0309 Company Response to Staff Data Request No. 52.

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1 documentation (for verbal discussions, provide a written description of the discussion)
2 reviewed as part of the research performed for its decision to partner with Allconnect.⁷

3 Q. Is Staff aware that at the time of KCP&L-GMO's peer review, Ameren
4 Missouri was not using the "no customer consent – Confirmation Model" that KCP&L-GMO
5 was intending to use, i.e., Ameren Missouri customer service representatives were asking
6 customers for their consent to be transferred to an Allconnect customer representatives?

7 A. Yes. Staff knows this for two reasons. Peer review notes in response to Staff
8 data requests by KCP&L-GMO provide indication of the model Ameren was using, which
9 included mention of: 1) Ameren ** _____
10 _____ ** 2) Staff further verified that Ameren was using the
11 "customer-consent – Transfer Model" in a phone call with Ameren personnel on December 3,
12 2015 at the time of the peer review discussed by Ms. Trueit. Ameren Missouri informed Staff
13 that it subsequently eliminated the use of Allconnect totally because so few customers would
14 consent to the transfer.

15 Q. Were there other aspects of the peer review documentation Ms. Trueit used to
16 support KCP&L-GMO's position to use the "no-customer consent – Confirmation Model"
17 that Staff found of concern?

18 A. Yes. Perhaps most concerning were the peer review notes from Excel
19 which said:

20 ** _____
21 _____
22 _____

⁷ File No. EW-2013-0011 Company Response to Staff Data Request No. 47A. ** _____

_____ ** to describe one type of customer complaint regarding Allconnect.

* * 8

The peer review notes are presented in Schedule LAK-s1.

Staff believes the ** _____ ** reference is the withholding of the utility confirmation number, which the KCP&L-GMO customer service representatives do not provide their customers but instead transfer to Allconnect customer service representatives to provide. One definition of ** _____ ** provided by the Merriam-Webster dictionary is "the ploy of offering a person something desirable to gain favor (as political support) then thwarting expectations with something less desirable." Bait and switch is a tactic to entice a person to continue to listen to someone because of the listener's interest in learning or obtaining some item while the person talking hopes to induce the listener to commit to something beyond the listener's original item of interest.

Q. Does the Staff have any other knowledge regarding the recent treatment of customer information by any of the peer utilities mentioned in Ms. Trueit's testimony?

A. Yes. On August 19, 2015 the Staff's Manager of Consumer Services Department was advised by her contact at Ameren Missouri in case the Consumer Services Department might receive phone calls, that Ameren Missouri had decided to bring to a conclusion its practice of releasing customer information to municipalities. These municipalities paid an annual fee of \$150, for this customer information including names and addresses of people who moved in and out of the municipalities. The information evidently was used by the municipalities to ensure that the municipalities received occupancy permit payments. Apparently, for safety purposes, there is one exception, which is Ameren Missouri advises if solar panels are installed at a location. Thus, it is our understanding, that Ameren

⁸ Ibid.

1 Missouri will continue to share a list with fire departments of addresses where there is a solar
2 panel installed, but it will not include customer names or personal information.

3 The Consumer Services Department requested any correspondence from Ameren
4 Missouri to the municipalities, and the letter Schedule LAK-s2 was provided to Staff.
5 (The attached letter shows a date of August 24, which is the date it was printed here. The
6 electronic file for the letter bears a date of August 5.) It is my understanding from Staff
7 Counsel that some cities have advised Ameren Missouri that they have ordinances requiring
8 that Ameren Missouri provide the information and in these situations Ameren Missouri will
9 provide only the address at which service was connected.

10 Q. Is it Staff's opinion that Ms. Trueit's rebuttal testimony regarding the call
11 transfer process contains inconsistencies?

12 A. Yes. On page 4, line 21 in describing the call transfer process in her rebuttal
13 testimony Ms. Trueit indicates ". . . the CSR [Customer Service Representative] advises the
14 customer that *the call will be transferred* to Allconnect." Page 5, lines 2 through 4 of her
15 rebuttal indicates that after the CSR asks the customer if there is anything else they can assist
16 the customer with the CSR *will transfer* the customer phone call to Allconnect. Subsequently,
17 however, on page 7 lines 16 and 17 of her rebuttal testimony Ms. Trueit states "If they do not
18 wish to be transferred they are able to advise the CSR of this. The Company CSR does not
19 force a customer to be transferred to Allconnect."

20 Page 25 of the "Report of Staff's Investigation" filed in Case No. EO-2014-0306
21 describes the critical call transfer differences between the "no customer consent -
22 Confirmation Model" and the "customer consent - Transfer Model." The Company's rebuttal
23 testimonies were, or nearly were, entirely silent regarding the Staff's report but the

1 distinctions explained in the report between these two call transfer models is critical to Staff's
2 complaint against KCP&L-GMO and Ms. Trueit's testimony.

3 First and foremost, Staff argues that the utility has overwhelmingly greater control in
4 the service turn-on process than do its customers. Other than the customer making the initial
5 service request to the utility, KCP&L-GMO controls all remaining processes including
6 answering customer calls, verifying customer information and customer identify, providing
7 confirmation of service, establishing service start dates, creating customer records, the actual
8 turning-on of service etc.

9 The Company directs and instructs customers that their calls *will be transferred to*
10 *Allconnect to 1) verify the accuracy of the information keyed in and 2) so that the customer*
11 *may receive his/her confirmation number relating to the connection of service on a specific*
12 *day.* Staff argues and KCP&L-GMO have indicated that under the "confirmation – no
13 customer consent requested" model, most customers will comply⁹ because customers believe
14 they must be transferred to get their confirmation number, as the utility has just directed. The
15 customers want to be certain that KCP&L-GMO service personnel will begin service on the
16 day committed, at the address arranged and for the correct customer. Likely customers
17 believe there is value in having the confirmation number to resolve problems with the service
18 orders if they occur. So, consequently, customers permit the transfer to get the confirmation
19 number in which gives Allconnect the time to "sell" non-utility services to these captive
20 customers.

21 The "no-customer consent Confirmation Model" hinges upon this fact and its
22 very design is to "maximize the number of calls transferred."¹⁰ The description of the

⁹ File No. EC-2015-0309 Company Response to Staff Data Request No. 57.

¹⁰ File No. EW-2013-0011 Company Response to Staff Data Request No. 12.

1 "no-customer consent - Confirmation Model" in the KCP&L-GMO-Allconnect response to
2 Staff Data Request No.12 in File No. EW-2013-0011 shows that the model is based on
3 minimal talk time and effort to the utility company representative and maximum talk time and
4 effort to the Allconnect customer representative. The response to Staff Data Request No.12 in
5 File No. EW-2013-0011 succinctly states: "The utility will transfer the call to Allconnect
6 during wrap up to finalize the confirmation." To expect customers who want to get their
7 electric service connected at a date and time that accommodates them to "speak up," to "assert
8 themselves," to "become aggressive," and reject the call transfer, in contrast to accepting the
9 utility's direction pushing the call transfer when their consent has not been sought is
10 expecting the unrealistic and the unreasonable under the circumstances. The very fact that
11 KCP&L-GMO does not give their service confirmation numbers to customers but instead
12 transfers those numbers to an unregulated entity is the ** _____ **¹¹ hook, or enticement to
13 transfer the customer's call to Allconnect.

14 Further, Staff has recorded calls in its possession where customers stated to KCP&L-
15 GMO they did not want the services Allconnect offered but their call was transferred to
16 Allconnect anyway.¹² Staff will provide those call recordings to the Commission if those are
17 desired.

18 Q. Do inconsistencies appear to exist with Ms. Trueit's statement on page 4, line
19 23 to page 5 line 2 and information provided previously by KCP&L-GMO regarding the
20 Allconnect program at KCP&L from 2005-2007?

21 A. Yes. Ms. Trueit states: "At times the customer has general questions about the
22 [Allconnect] services. The CSR addresses any questions the caller might have." Part of the

¹¹ File No. EW-2013-0011 Company Response to Staff Data Request No. 47A. ** _____

** to describe one type of customer complaint regarding Allconnect.

¹² ** _____ ** Recorded Phone Calls.

1 rationale KCP&L-GMO gave for its prior unsuccessful relationship with Allconnect in the
2 2005 to 2007 time frame was that under the "customer consent - Transfer Model" its customer
3 service representatives could not answer customer questions regarding Allconnect and
4 thus call times were elongated. The KCP&L-GMO response indicates that the "no-customer
5 consent - Confirmation Model" is less complex for KCP&L-GMO customer service
6 representatives.¹³

7 In Staff Data Request No. 69 in Case No. EC-2015-0309, Staff asked what additional
8 or different training/instruction has been provided to the KCP&L-GMO customer service
9 representatives beginning in 2013, if any, as a result of KCP&L's prior experience in 2005-
10 2007 with Allconnect when customers asked questions that the KCP&L customer service
11 representatives could not answer. KCP&L-GMO responded that "There has been no
12 indication provided by the Company that its call representatives are more familiar now with
13 the products and services Allconnect offers than it was during the prior relationship KCP&L-
14 GMO had with Allconnect."

15 Q. Does Staff's investigation dispute Ms. Trueit's statements on page 5, lines 12
16 through 13 of her rebuttal testimony including that the Allconnect customer service
17 representatives give the confirmation number and once verification is complete, then the
18 Allconnect customer service representative offers its additional services?

19 A. Yes. As stated in the Report of Staff's Investigation and by the Company's
20 admission 2% of all confirmation numbers generated by KCP&L-GMO fail to transfer to
21 Allconnect at the time customer calls are transferred, making it impossible for at least 2% of
22 such customers to receive a confirmation number from Allconnect.¹⁴ Thus, the very process

¹³ File No. EW-2013-0011 Company Response to Staff Data Request No. 13.

¹⁴ File No. EO-2014-0306 Company Response to Staff Data Request Nos. 34 and 48.

1 created by KCP&L-GMO to transfer customer to get confirmation numbers has a built-in 2%
2 error rate of customers not getting what is believed to be necessary information. However,
3 the number of customers not receiving a confirmation number is higher. Staff twice requested
4 copies of sets of recorded calls between KCP&L-GMO customers and KCP&L-GMO
5 customer service representatives and Allconnect customer service representatives¹⁵ and those
6 recordings further demonstrate deficiencies by Allconnect to provide customers their
7 confirmation numbers.

8 Staff has listened to numerous call recordings and of 86 customer calls transferred to
9 Allconnect, 29 or approximately 34% of those customers did not receive a confirmation
10 number on the phone call. Eighteen, or approximately 21% of those 86 customer calls
11 received the confirmation number at the end of the Allconnect call, after they had listened to
12 Allconnect "sales pitches."¹⁶ Further, five of the 86 customers had to ask for the confirmation
13 number. In total, the percentage of customers who did not receive a confirmation number or
14 received the confirmation number at the end of the call with Allconnect was approximately
15 55%. Staff finds this practice unacceptable for regulated utility customer service. A
16 confirmation number for the startup of electric service should be promptly provided to
17 customers by the utility providing the service and to whom customers pay rates. Staff's
18 analysis of these 86 calls is presented in Schedule LAK-s3.

19 Q. What, in your opinion, may account for the discrepancy between what
20 Ms. Trueit says occurs regarding the KCP&L-GMO transfer of customer calls to Allconnect
21 and what actually occurs?

¹⁵ File No. EO-2014-0306, Company Response to Staff Data Request No. 21, 51

¹⁶ File No. EW-2013-0011 Company Response to Staff Data Request No. 11.

1 A. The difference is in the fact that the practical application, operation and/or
2 practice may differ from a direction, a policy, a defined procedure, intention, guideline or
3 belief of what may be intended to occur. Customers are often the ones who lose in these
4 "process disconnection" occurrences.

5 Q. Ms. Trueit states on page 5, lines 16 through 18 that the customer name,
6 service address, start date of service, account number, and confirmation number are
7 transferred to Allconnect to facilitate the verification process. Is such a process necessary to
8 verify the service of a regulated Missouri utility customer?

9 A. No, and Staff's immediate question is: "To facilitate for whom?" The answer
10 of which, Staff believes, is to facilitate for KCP&L-GMO and for Allconnect. Not only did
11 KCP&L-GMO successfully perform such verification of customer information and
12 provision of confirmation number for its customers for years prior to its current arrangement
13 with Allconnect, but every regulated utility in the State of Missouri, to the best of Staff's
14 knowledge, successfully performs these functions without the aid of a third party. This is a
15 process designed, not to "first serve" customers, but to first serve KCP&L-GMO with
16 non-regulated profits¹⁷ and Allconnect **

17 **¹⁸ It is the Staff's position that the greatest way
18 to demonstrate the Company's desire to satisfy customers would be to 1) first give customers
19 their confirmation number and 2) then request the customer's consent to be transferred to
20 Allconnect before transferring the customer's call to Allconnect.

¹⁷ File No. EW-2013-0011 Company Response to Staff Data Request No. 45 (**

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¹⁸ File No. EW-2013-0011 Company Response to Staff Data Request No. 45 (**

**).

1 Q. Throughout the Staff's investigation into KCP&L-GMO's utilization of
2 Allconnect, KCP&L-GMO emphasizes the service Allconnect performs through the
3 verification and correction of customer data and Ms. Trueit testifies to this as well on page 6,
4 lines 1 through 3 her rebuttal testimony. What observations can Staff offer regarding the
5 correction of customer data performed by Allconnect?

6 A. KCP&L-GMO's information regarding the corrections Allconnect performs is
7 negligible and does not justify the transfer of customer calls and customer data without
8 customer consent for such transfers. Ms. Trueit's work paper (attached as Schedule LAK-s4)
9 supporting her rebuttal testimony provides the following¹⁹:

10 January – October 2015: 80,741 Calls Transferred*

11 Corrections Sent to KCP&L-GMO: 10,217

12 KCP&L-GMO Actual Corrections Made: 279

13 *Includes Kansas and Missouri Calls

14 During the July 17, 2014 meeting between KCP&L-GMO, Allconnect, OPC and Staff,
15 KCP&L-GMO informed Staff at that time that data errors being found by Allconnect had
16 been declining.²⁰ The figures above demonstrate that KCP&L-GMO is rejecting or not
17 correcting approximately 97% of the "potential corrections" that Allconnect is providing the
18 Company.

19 Q. Ms. Trueit describes the customer complaint process handled by Allconnect on
20 page 6 beginning at line 15 in her rebuttal testimony. The deferral to Allconnect by KCP&L-
21 GMO of customer Allconnect complaints is a point of disagreement between the Staff and

¹⁹ File No. EC-2015-0309 -Trueit Work Paper to Rebuttal Testimony.

²⁰ File No. EO-2014-0306 Report of Staff's Investigation, December 19, 2014, pg. 15.

1 KCP&L-GMO. Why does the Staff believe that KCP&L-GMO should investigate the
2 complaints directly by its customers made against Allconnect?

3 A. For two primary reasons: 1) KCP&L-GMO regulated customers did not call
4 Allconnect – they called KCP&L-GMO for the sole purpose of requesting initiation of or
5 transfer of electric service. KCP&L-GMO, without customer consent, transferred their calls
6 and customer information to a third-party telemarketing company²¹ called Allconnect.
7 2) Allconnect operates a telemarketing type of “call center,” with a type of training that is
8 inherently different than that of KCP&L-GMO utility call center representatives. Staff
9 believes Allconnect has an incentive to demonstrate it is not providing detrimental service to
10 KCP&L-GMO customers and therefore may categorize call resolutions in a manner that is
11 neutral or benign in characterization or appears least-detrimental to service, such as not
12 classifying calls as “pushy” as indicated above and in the Staff report²².

13 Allconnect is a third party marketing company and its customer service representatives
14 are trained to “rebut” utility customer objections to the services and products being offered by
15 Allconnect to optimize each call to get the best possible financial outcome for Allconnect.²³
16 Allconnect’s ** _____ ** and Allconnect’s ** ____
17 ____ ** are attached as Schedule LAK-s5 which demonstrates the emphasis on “rebutting”
18 customer objections.

19 Page 30 of the Report of Staff’s Investigation addresses the concern Staff has
20 when Allconnect investigates complaints made against it by KCP&L-GMO customers
21 which include customer expressions of “pushy” behavior. The Allconnect “Score Card”

²¹ File EC-2015-0309 Darin R. Ives Rebuttal Testimony Schedule DRI-7 Page 5.

²² File No. EO-2014-0306 Report of Staff’s Investigation pg. 30.

²³ File No. EW-2013-0011 Company Response to Staff Data Request No. 29, document entitled “New QA Guideline 2012,” page 5 and Company Response to Staff Data Request No. 45.

1 documentation for 2013 demonstrated no acknowledgment by Allconnect of treating
2 customers in a pushy manner but the Staff Report included written documentation where
3 customers indicated they had been treated in such a manner and call recordings also
4 demonstrated such behavior. Even very recent customer comments provided in the October
5 2015 "Allconnect Tracking Verbatims"²⁴ provided evidence of at least five customer remarks
6 where customers expressed they had been 'pushed' by Allconnect in some manner.
7 Allconnect's call center is inherently different from a Missouri regulated utility call center and
8 in Staff's opinion should not be investigating the complaints made by Missouri electric
9 customers who did not consent to the transfer of their call. To Staff, this seems much like
10 putting the "fox in charge of the hen house."

11 Q. Page 7 line 16 of Ms. Trueit's testimony indicates that if customers "do not
12 wish to be transferred they are able to advise the CSR of this." How do you respond?

13 A. The utility is directing the calls to Allconnect, informing customers their calls
14 will be transferred and most customers are not going to request the transfer be stopped as they
15 do not know they can stop the transfer. Furthermore, Allconnect has what the KCP&L-GMO
16 customer needs: the confirmation number that service will be connected on a specific day,
17 which is the reason the customers called KCP&L-GMO in the first place. Customers during
18 their request for service should be able to trust the instructions their regulated utility is
19 providing them and not be placed in a position of objecting to the transfer of the call to a
20 marketer. (Later in my surrebuttal testimony, excerpts will be presented from recorded calls
21 of customers who did not want to be "sold" additional offerings and their calls were
22 transferred to the Allconnect customer service representative anyway.)

²⁴ File No EC-2015-0309 Company Response to Staff Data Request No. 51.

1 KCP&L-GMO customers have no forewarning, are unaware, and unlikely to be
2 prepared for their call to be transferred outside KCP&L-GMO to a telemarketer. KCP&L-
3 GMO data demonstrates most customers do not speak-up in objection. In Staff Data Request
4 No. 57 in File No. EC-2015-0309, Allconnect responded in part: "Approximately 20% of
5 customers choose not to be transferred to Allconnect and they are not transferred."

6 The no customer consent - transfer model KCP&L-GMO has chosen to use with
7 Allconnect is designed to maximize the number of customers that Allconnect customer
8 representatives talk with and maximize the committing to the transfer of services and sales of
9 home services and products that Allconnect is engaged in marketing.²⁵ Further, in a meeting
10 occurring on July 17, 2014, among Allconnect, KCP&L/GMO, Staff and the Office of the
11 Public Counsel ("OPC"), the Company indicated that fewer customers would allow their
12 calls to be transferred to Allconnect if their consent was required than if not. The Company
13 has also provided evidence through its reference-check notes of Ameren²⁶ and Staff has
14 had further discussions with Ameren on this topic, that overwhelmingly, when given an
15 option to be transferred or not to Allconnect, customers reject the opportunity to have their
16 calls transferred.

17 The confirmation number has significant value to customers as it is the demonstration
18 they have a commitment from KCP&L-GMO and an understanding they will have service. It
19 is called a "confirmation number" because it confirms the customer will have service.
20 Confirmation numbers have value beyond the commitment of the utility to provide
21 service. Landlords sometimes require confirmation numbers during the leasing or renting

²⁵ File No. EW-2013-0011 Company Response to Staff Data Request No. 12

²⁶ File No. EW-2013-0011 Company Response to Staff Data Request No. 47A **

** to describe one type of customer complaint regarding Allconnect.

1 process and confirmation numbers may be used as a tracking mechanism if service is not
2 subsequently received.²⁷

3 Q. Ms. Trueit on page 7, line 22 through page 8, lines 1 through 4 of her rebuttal
4 testimony states that “[t]he Company does not withhold confirmation numbers” and that if the
5 customer advises the CSR that they do not want to be transferred, the CSR is trained to
6 provide the customer their order confirmation number . Do you agree?

7 A. No from a practical application. The burden is placed on the customer to speak
8 up and tell the KCP&L-GMO customer service representative that he or she does not want to
9 be transferred and the burden is on the customer again to ask for his or her confirmation
10 number if the KCP&L-GMO customer service representative does not provide the
11 confirmation. Staff has heard evidence in recorded customer calls it received from the
12 Company of customers who do speak up indicating they do not want to be transferred to
13 Allconnect and are still transferred.

14 Customers are not asked if they want to be transferred; they at best are instead directed
15 and informed by the KCP&L-GMO customer service representative that they will be
16 transferred to Allconnect, and thereafter will have their information verified and will receive
17 their confirmation number in addition to having the opportunity to arrange for home services
18 and products. It should not be readily assumed that customers know they can choose to not be
19 transferred, can still obtain their confirmation number and have some assurance that the
20 KCP&L-GMO service personnel will arrive on the committed day to turn-on electric service.
21 Staff is concerned about the effect of the of the KCP&L-GMO’s practice on all customers but
22 in particular senior citizens and very inexperienced customers. The “no-customer consent –
23 Confirmation Model” is designed to not give customers the opportunity to say “No” to being

²⁷ File No. EC-2015-0309 Company Response to Staff Data Request No. 2.

1 transferred to an Allconnect customer service representative by not asking the customer for
2 their consent to be transferred to an Allconnect customer service representative and withholds
3 confirmation of electric service by the utility company to create the impression customers
4 must be transferred.

5 Q. How do you respond to Ms. Trueit's statement on page 8, line 22 of her
6 rebuttal testimony that says there has not been one Commission Complaint since the KCP&L-
7 GMO relationship began in 2013 with Allconnect.

8 A. This matter does not rest on the presence or absence of customer complaints
9 submitted to the Consumer Services Department and because the Commission has not
10 received complaints does not affirm KCP&L-GMO's practices. KCP&L-GMO is aware of
11 complaints and has received them. KCP&L-GMO have in their possession the complete set
12 of the October 2015 Allconnect Tracking Study Verbatims that are referred to in Ms. Trueit's
13 rebuttal testimony at page 12, line 21 to page 13, line 10 and Schedule JAT-7, which is a
14 subset. Not all free form comments (Verbatims) are positive. There are 26 comments of a
15 negative nature out of 373 comments in total which is approximately 6.97 %. The severity of
16 some of these negative comments should not be dismissed including requiring initial or
17 additional phone calls to these customers to attempt to find out more about these calls and
18 situations. These 26 comments are attached as Schedule LAK-s6.

19 Staff noted in its Report of Staff's Investigation filed December 19, 2014 that
20 customer complaint data including complaint numbers must be reviewed with the
21 understanding that the absence or low number of customer complaints may not be indicative
22 of overall customer satisfaction because many dissatisfied customers will not complain. Some
23 statistics indicate that for every one customer who expresses a complaint 26 others share the

1 complaint but do not voice their concern.²⁸ If KCP&L-GMO is intent on increasing its
2 customers satisfaction, then why not have the KCP&L-GMO customer representatives ask the
3 KCP&L-GMO customers for their consent to transfer them to Allconnect customer service
4 representatives?

5 The Company's practice of transferring calls and customer information without
6 customer consent, besides being violative of 4 CSR 240-20.015(2)(C), is violative of any
7 sense of courtesy to the customer. The KCP&L-GMO customer is on the phone talking with
8 the KCP&L-GMO customer service representative. No additional effort is necessary to find
9 the customer or to ask the very question: "May I transfer you and your information to an
10 Allconnect customer representative who will verify the accuracy of the information, provide
11 you your confirmation number and see if he/she may be of assistance with various home
12 services and products related to your move?"

13 Q. On page 9 of Ms. Trueit's rebuttal testimony she addresses customer
14 satisfaction surveys that are conducted which are asserted to support KCP&L-GMO's
15 utilization of Allconnect. Do you have any observations and if so what are they regarding
16 customer satisfaction and Allconnect?

17 A. Yes. All of the survey information presented in Ms. Trueit's schedules, JAT-3
18 through JAT-6 demonstrate various degrees of customer dissatisfaction with Allconnect.
19 KCP&L-GMO's response to Staff Data Request No. 607 in File No. ER-2014-0370 provided
20 general Customer Satisfaction Scores of the following for January through April 2015
21 respectively: ** _____ **. Those
22 scores demonstrate some ** _____ ** of customer satisfaction with Allconnect but
23 regardless, and even if the trend ** _____ **, KCP&L-GMO is employing a practice that is

²⁸ Book: "A Complaint is a Gift," Authors: Janelle Barlow and Claus Miller, Second Edition (1996), pg. 100.

1 detrimental to the service it is providing its customers. If KCP&L-GMO 1) provided
2 confirmation numbers to its customers instead of inappropriately transferring those numbers
3 to Allconnect to then be given to customers (in some cases only after listening to sales talks)
4 and 2) requested customer consent before transferring the call to Allconnect, the entire
5 discussion of "customer satisfaction" would change as customers had consented to the
6 transfer of their calls and information to Allconnect. If at the end they were dissatisfied with
7 the process or treatment they received by Allconnect they had at least provided their consent
8 to the transfer. If KCP&L-GMO did these two things, they would not be in a position of
9 defending 'customer satisfaction.'

10 Ms. Trueit argues at page 8, lines 14 through 21 that her rebuttal testimony
11 attachments of customer satisfaction statistics point to improvement in fewer call escalations
12 and ultimately less dissatisfaction with the Allconnect process, however, the customer
13 satisfaction data she presents does not necessarily support her affirmation of the Allconnect
14 process. Ms. Trueit returns at page 12 of her rebuttal testimony to asserting that the
15 independent Allconnect and KCP&L-GMO customer surveys indicate strong overall customer
16 satisfaction with the Allconnect process.

17 Her schedule JAT-6, KCP&L Independent Allconnect Marketing Survey 4th Quarter
18 2013 through 3rd Quarter 2014 demonstrates a 17.7% of "Somewhat or Greatly" Decreased
19 customer perception of KCP&L after having the opportunity to purchase Allconnect home
20 services. At the July 17, 2014 meeting with KCP&L-GMO, Allconnect, OPC and Staff,
21 Mr. Charles Caisley of KCP&L-GMO specifically indicated that he was not satisfied with

1 even 14% of customers at that time indicating their experience with Allconnect had negatively
2 impacted their opinion of KCP&L. Staff asserts that if 14%²⁹ is bad – then 17.7% is worse.

3 The Allconnect Tracking Study Verbatims included in Ms. Trueit's Schedule JAT-7 is
4 an incomplete list of Study Verbatims. Staff Data Request No. 51 in File No. EC-2015-0309
5 requested any non-positive comments that were received. Staff received in response to its
6 data request a complete list of Allconnect Tracking Study Verbatims – October 2015 which
7 includes 26 negative customer comments, which are attached to my surrebuttal testimony as
8 Schedule LAK-s5. But again, regardless of survey results, whether they may be interpreted to
9 be positive or negative, KCP&L-GMO's manner of transferring calls and customer
10 information is detrimental to its customers because consent is not sought.

11 Q. On page 10, lines 16 through 19 of Ms. Trueit's rebuttal testimony she
12 indicates that customers do not suffer detriment by reaffirming certain customer specific
13 information during the Allconnect verification process and instead *receive the benefit* of order
14 accuracy confirmation. How do you respond?

15 A. Customers are entitled to order accuracy and appropriate confirmation of their
16 start of service and these practices are not something above and beyond. All other regulated
17 utilities in the State of Missouri, even the small water and sewer systems strive toward order
18 accuracy, customer information accuracy and confirming accurately the start of service
19 without engaging the "assistance" of a third party. Regulated customers pay for all of the
20 systems, processes, practices, management, personnel, benefits, training, equipment etc. that
21 support "order accuracy" and "confirmation" of the commencement of regulated service. To
22 say that customers receive a benefit implies that KCP&L-GMO is somehow not required

²⁹ File No. EO-2014-0306 Report of Staff's Investigation, p. 39.

1 to provide order accuracy and confirmation as a standard part of providing safe and
2 adequate service.

3 Staff has worked closely with all of the state's largest regulated utilities in recent years
4 and it cannot envision that any other regulated utility in the State of Missouri views order
5 accuracy and confirmation in the manner KCP&L-GMO does. In addition, Staff has listened
6 to numerous recorded phone calls throughout its investigation including customer interaction
7 with KCP&L-GMO customer service representatives and customer interaction with
8 Allconnect customer service representatives. KCP&L-GMO customer service representatives
9 clearly strive to ensure they are putting correct customer information into KCP&L-GMO
10 customer information systems. Most telling on this topic is Ms. Trueit's statement on page 6,
11 lines 2 through 3 of her rebuttal testimony that "[y]ear to date October 2015, there have been
12 279 corrections made for 80,741 (or 0.345%) customer accounts transferred to Allconnect."
13 The Staff would note the very small number of actual corrections being made by
14 KCP&L-GMO.

15 If the Company determines it has a weak internal control process within the bounds of
16 its call center that is resulting in increased mistakes in customer record entry, it should take
17 steps to pin point those weaknesses and correct them through the various managerial tools it
18 has available including coaching, training and evaluation of its call center personnel.

19 In addition, Staff would note KCP&L's response to Staff Data Request No. 613 in File
20 No. ER-2014-0370 on the matter of any necessity for Allconnect to verify the information
21 recorded by KCP&L-GMO's customer service representatives. Staff's Data Request No. 613
22 followed up the testimony of Mr. Ronald Klote that "the initial purpose of transferring
23 [KCP&L-GMO customer connect service] calls is to serve the regulated business by having

1 Allconnect confirm the accuracy of customer information . . . input by KCP&L employees
2 into the billing system.” KCP&L’s response was, in part, as follows:

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15 Further, Staff completely rejects and believes historical utility practice demonstrates
16 the Commission should also reject KCP&L-GMO’s statements on page 11, lines 1 through 4
17 of Ms. Trueit’s rebuttal testimony which indicates that KCP&L-GMO would have to fulfill
18 Allconnect’s role in another manner if KCP&L-GMO could not rely upon Allconnect for its
19 customer “verification work.” As for Allconnect not charging KCP&L-GMO for the
20 verification and confirmation number work, this task is essential to keeping the customer on
21 the call so that the call can be transferred without losing the customer and Allconnect can
22 have its opportunity to market home services and products.

23 Ms. Trueit asserts at page 11, line 4 that “terminating the Allconnect relationship
24 would increase customer costs.”

25 **MR. DWIGHT SCRUGGS REBUTTAL:**

26 Q. On page 3, lines 12 through 15 of Mr. Scruggs’ rebuttal testimony he states
27 that “Allconnect has fair and open vendor partnerships and thus does not have an exclusive
28 agreement with any service provider. Allconnect is open to having a business opportunity

1 discussion with any service provider who is interested in partnering with Allconnect.” What
2 do these statements mean for KCP&L-GMO customers?

3 A. It means Allconnect cannot offer a complete list of service providers and in
4 numerous call recordings Staff has listened to since it began investigating this matter it has
5 not heard Allconnect indicate such a fact to KCP&L-GMO customers. While in a competitive
6 environment such practices may be acceptable, Allconnect, however, likes to characterize
7 itself as in partnership with KCP&L-GMO. It is operating as an “extension” of KCP&L-
8 GMO and calls and customer data are transferred without customer consent.

9 Using KCP&L’GMO’s argument that Allconnect is first verifying customer
10 information and providing a confirmation number is providing regulated utility services then
11 arguably 4 CSR 240-20.015(2)(E) in essence should apply and the customer should be
12 advised that other service providers may be available. Google Fiber is particularly
13 noteworthy as a missing Allconnect offering since its emergence in the Kansas City area
14 (KCP&L-GMO’s service territory) and the fact that it may offer Internet and television
15 services that are more economical than other providers offering the same services.

16 Q. Mr. Scruggs addresses the Puget Sound Energy complaint filed by the
17 Washington Utilities and Transportation Commission’s Staff on page 4, line 12 of his rebuttal
18 testimony. Why did the Staff have the opinion that the Commission may want to be made
19 aware of such information?

20 A. The Staff believes the Commission may have interest in any state utility
21 regulatory case involving Allconnect in evaluating the matter in Missouri. The Puget Sound
22 Energy complaint filed in Washington has some similarities with the present Missouri case as
23 the Missouri Staff is alleging that KCP&L-GMO has violated the Affiliate Transactions Rule,

1 4 CSR-240-20.015(2)(C), with its Allconnect relationship. The reasons for this are a new or
2 change of service connection call to a utility and customer information transferred to
3 Allconnect without customer's consent being sought when there is an agency rule requiring
4 customer consent for the transfer of the specific customer information. In Washington State,
5 the applicable rule is WAC 480-100-153, which in part:

6 (1) An electric utility may not disclose or sell private consumer
7 information with or to its affiliates, subsidiaries, or any other third party
8 for the purposes of marketing services or product offerings to a
9 customer who does not already subscribe to that service or product,
10 unless the utility has first obtained the customer's written or electronic
11 permission to do so.

12 (2) Private consumer information includes the customer's name,
13 address, telephone number, and any other personally identifiable
14 information, as well as information related to the quantity, technical
15 configuration, type, destination, and amount of use of service or
16 products subscribed to by a customer of a regulated utility that is
17 available to the utility solely by virtue of the customer-utility
18 relationship.

19 Q. On page 6, lines 7 through 10 of Mr. Scrugg's rebuttal testimony he provides
20 the purported benefits Allconnect provides to KCP&L-GMO including independent
21 verification of information within the new or transferring electric service order corrections or
22 adjustments to the KCP&L-GMO customer service representatives' intake. How do you
23 respond to these two benefits?

24 A. As stated in response to Jean Trueit's rebuttal, such independent verification is
25 not only not necessary, KCP&L and GMO's predecessors successfully verified their own
26 customer data for decades without problem. Further, no other regulated utility in the State of
27 Missouri depends upon or requires such third party verification. Second and as was presented
28 above, the magnitude of data corrections KCP&L-GMO actually performs based upon
29 information provided to it from Allconnect is de-minimis with only 279 corrections being

1 made by KCP&L-GMO, which Staff understands to include both Kansas and Missouri
2 corrections.

3 Q. Mr. Scruggs states on page 6 lines 15 through 16 of his rebuttal testimony that:
4 "Once verification is complete, the Allconnect agent will provide the confirmation number
5 (verbally and/or via email) to the customer." Is this statement consistent with other
6 statements from KCP&L-GMO and Staff's understanding regarding how KCP&L-GMO
7 customers are supposed to receive their confirmation number?

8 A. It is unclear. Staff's understanding and the KCP&L-GMO have stated:

9 "The process is for customers who reach Allconnect to receive their
10 confirmation number verbally prior to the offer of additional products
11 & services. There is not a way to track a percentage of number of
12 times it happens without listening to every call they handle. Through
13 our QA process we find that the confirmation # is offered upfront the
14 majority of the time."³⁰

15 It is unclear from Mr. Scruggs' testimony if he is referring to the confirmation number being
16 e-mailed to the customer in lieu of being provided verbally. In response to Staff Data Request
17 No. 34 in File No. EO-2014-0306, KCP&L-GMO related on 8/13/2014 that since launch of
18 the Allconnect program about 2% of KCP&L-GMO customers transferred to Allconnect did
19 not receive their confirmation number because the KCP&L-GMO customer service
20 representative did not send the data to Allconnect customer service representatives.

21 Q. Did Staff's review of recorded phone calls of KCP&L-GMO customers calling
22 for new service connection or change of address service connection and then being transferred
23 to Allconnect customer service representatives bear out Mr. Scruggs' statement on page 7,
24 lines 7 through 10 of his rebuttal testimony that "after confirming the information and
25 providing the confirmation number, the Allconnect agent next engages the customer in a

³⁰ File No. EO-2014-0306 Company Response to Staff Data Request No. 48.

1 conversation to determine whether customer wants to purchase any products or services from
2 service providers”?

3 A. No. As previously indicated above, Staff has listened to numerous recordings
4 of KCP&L-GMO customer transfers to Allconnect customer service representatives. Of 86
5 KCP&L-GMO new service or change of address service customer calls transferred to
6 Allconnect, 29 customers or approximately 34% of those customers did not receive a
7 confirmation on the phone call. Eighteen customers or approximately 21% of those 86
8 customer calls received the confirmation number at the end of the Allconnect call, after they
9 had listened to Allconnect’s sales pitch for home services and products.³¹ Further, five of the
10 86 customer calls outright asked for their confirmation number after being transferred to
11 Allconnect. Also as previously noted, since the launch of the Allconnect program about 2%
12 of KCP&L-GMO customers transferred to Allconnect did not receive their confirmation
13 number because the KCP&L-GMO customer service representative did not send the data to
14 the Allconnect customer service representative. Such process failures for regulated electric
15 customers bring into question why KCP&L-GMO would risk such insufficient, inefficient and
16 ineffective service treatment for its customers. KCP&L-GMO is not appropriately controlling
17 the manner in which its customers receive a confirmation number which their customers can
18 rely on as an assurance that their electric service will be connected as scheduled. The
19 confirmation number is provided too often after the sales presentation if it is provided at all.

20 Q. Page 7, lines 7 through 10 of Mr. Scruggs testimony states that “after
21 confirming the information and providing the confirmation number, the Allconnect agent next
22 engages the customer in a conversation to determine whether customer wants to purchase any
23 products or services from service providers (i.e. ATT, CenturyLink, Comcast, DISH, etc.).

³¹ File No. EW-2013-0011 Company Response to Staff Data Request No. 11.

1 Does Allconnect consistently “confirm information and provide confirmation numbers”
2 before selling its services with customers?

3 Q. How does Staff respond to Mr. Scruggs’ testimony on page 9, lines 5 through
4 11, which in summary states: “In addition, the vast majority of customers report an improved
5 perception of their utility’s brand after interacting with us?”

6 A. First, Ms. Trueit’s attachments to her testimony demonstrate that 17.7% of
7 customers had a “somewhat or greatly decreased perception of KCP&L after the opportunity
8 to purchase additional home services.”³² That figure is significant but, as stated previously,
9 customer survey results, which may be subject to construct of the survey itself, do not justify
10 KCP&L-GMO’s operational practices with regard to Allconnect. Customer satisfaction with
11 Allconnect would be less of an issue in this case if KCP&L-GMO would 1) request customer
12 consent before transferring the calls and information to Allconnect 2) give customers up front
13 what was the subject of their phone call in the first place to KCP&L-GMO: confirmation that
14 they will have service connected on a specified date (represented by the confirmation
15 number).

16 Q. Do the declining ‘escalations’ Mr. Scruggs refers to on page 11 beginning at
17 line 13 of his rebuttal testimony relieve concerns with KCP&L-GMO’s practice of
18 transferring calls to Allconnect in the manner it is doing?

19 A. No. While declining escalations in any call center operation would be
20 perceived as positive, evidence demonstrates that not all customers complain but still harbor
21 significant dissatisfaction. Regardless, no survey process, reduction in escalations to

³² File No. EC-2015-0309 Trueit Rebuttal – JAT-6.

Surrebuttal Testimony of
Lisa A. Kremer

1 Allconnect will "make right" a practice whose foundation has been referred to in the peer
2 review notes provided by KCP&L-GMO as the ** _____ **³³

3 **MR. DARRIN R. IVES REBUTTAL:**

4 Q. While Staff Witness Keith Majors is also specifically addressing the rebuttal
5 testimonies of Mr. Darin Ives and Mr. Charles Caisley, do you have other specific comments
6 regarding aspects of their testimonies?

7 Yes. On page 13 beginning at line 22 through page 14 line 13 of Mr. Ives' testimony
8 he takes exception to Staff's assertion that the Company is violating R CSR 240-13.040(2)(A)
9 and indicates that Allconnect is qualified to investigate regulated utility customer complaints.

10 Q. Why does Staff believe Allconnect should not be investigating KCP&L-GMO
11 complaints?

12 A. As stated previously in my surrebuttal testimony, KCP&L-GMO customers did
13 not call Allconnect and Allconnect is not in the regulated utility call-center business.
14 Allconnect is third party marketing company with a very different business model than
15 KCP&L-GMO. Allconnect has an incentive to "optimize each call to get the best possible
16 financial outcome"³⁴ which is a significantly different business type than a regulated utility
17 who has a defined customer base that it must serve according to Missouri Public Service
18 Commission rules and Missouri Statutes. Further, Allconnect representatives are evaluated by
19 their opportunities to "increase conversions" which Staff understands to be sales. The
20 ** _____ ** presentation is attached to my testimony as. Allconnect is
21 not contracted with KCP&L-GMO as a "contracted call center" and to Staff's knowledge

³³ File No. EW-2013-0011 Company Response to Staff Data Request No. 47A. ** _____

** to describe one type of customer complaint regarding Allconnect.

³⁴ File No. EW-2013-0011 Company Response to Staff Data Request No. 45.

1 KCP&L provides no training to Allconnect on the manner in which Allconnect should
2 investigate customer complaints or handle calls.

3 Further, page 30 of the Staff Report filed in File No. EO-2014-0306 demonstrated
4 significant questions regarding Allconnect's "ScoreCard" to KCP&L-GMO which
5 documented "no pushy" calls when documentation existed demonstrating such calls. As also
6 included in the report, KCP&L does not audit Allconnect including the resolutions or root
7 causes assigned by Allconnect regarding its investigation of KCP&L-GMO customer
8 complaints. These concerns demonstrate that Allconnect does not possess the independence
9 and qualifications needed to appropriately investigate KCP&L-GMO complaints.

10 Q. How do you respond to Mr. Ives' remark on page 14 lines 12 and 13 of his
11 rebuttal testimony that "neither the Commission nor the Staff have the authority to tell the
12 Company how to manage its business as long as the Commission's regulations are being
13 satisfied?"

14 A. Staff does not believe KCP&L-GMO is satisfying the Commissions'
15 regulations and filed a complaint with the Commission to open the current docket. We
16 believe the Company's Allconnect arrangement is violating the Affiliate Transaction Rule, the
17 Company should have sought permission before selling customer data and the Company is not
18 investigating customer complaints appropriately and according to Commission rule by
19 sending that function to Allconnect.

20 Q. How do you respond to Mr. Ives' testimony on page 14 beginning at line 22
21 that "Staff wholly ignores the fact that utilities across the state have for decades regularly
22 provided customer information without customer consent to non-affiliated third party service

1 providers who undertake functions (including but not limited to collections, meter reading and
2 call center operations) in support of regulated operations?

3 A. Staff is not ignoring these facts and authored the very data request response
4 Mr. Ives refers (Staff Response to Data Request No. 8). Mr. Ives is arguing that Allconnect is
5 performing a third party service *that supports regulated operations* which it does not. In its
6 June 27, 2013 response to Staff's initial informal information requests in this matter, the
7 Company indicated in its response to Question 9 that "... this type of activity is not essential
8 to our core business". Mr. Ives ignored critical portions of Staff's response to Dr. No. 8
9 which states the following:

10 " . . . I am aware of no Missouri regulated utility that conducts its
11 business in a manner similar to KCP&L and GMO and the Allconnect
12 Direct Transfer Service Agreement with GPES. Allconnect payments
13 to KCP&L are not in support of regulatory activities/functions but
14 instead are in support of ownership and sale/transfer of KCP&L-
15 GMO's customer information to Allconnect. Third party contractors,
16 such as those referred to by KCP&L-GMO in this data request perform
17 services, to the best of my knowledge, to solely support regulated
18 utility service, of which there is no comparison to the KCP&L-GMO
19 and the Allconnect Direct Transfer Service Agreement."

20 There is no comparison between Allconnect and third party contractors that are
21 functioning in a capacity of sole support for the regulated utility's operations. Allconnect is a
22 third party marketing company that is acting on behalf of itself and its interests. It is paying
23 KCP&L for the transfer of customer data, customer calls and the circumstance of customers
24 moving/relocating to sell those customers services and products. The third party contractors
25 referenced in Staff's response to Data Request No. 8 do not resemble, in any manner,
26 Allconnect's relationship with KCP&L. The third parties identified in Staff's Data Request
27 Response No. 8 are paid by KCP&L and perform work on behalf of the utility including work
28 that must be done by the utility in its providing of service. Allconnect *pays* KCP&L for

1 customer data and customer calls which punctuates the difference in the relationships the third
2 party contractors identified in Staff's data request response and Allconnect.

3 Q. Mr. Ives indicates on page 16, lines 3 through 7 of his rebuttal testimony that
4 because Allconnect only uses the customer information if the customer consents to buying
5 services or products is an indication that KCP&L-GMO is not violating the Affiliate
6 Transactions Rule, 4 CSR 240-20.015(2)(C). Do you agree?

7 A. No. The rule language is clear:

8 Specific customer information shall be made available to affiliated or
9 unaffiliated entities only upon consent of the customer or as otherwise
10 provided by law or commission rules or orders.

11 KCP&L-GMO customer information is being made available to Allconnect customer sales
12 representatives who are *using* the information in their sales presentations to KCP&L-GMO
13 customers of home products and services.

14 Q. How does the Staff respond to Mr. Ives' comments on page 17, lines 6 through
15 19 which seem to repeat concerns he expressed on page 14 of his rebuttal testimony in
16 comparing third-party contractors, which perform work solely on behalf of and as an
17 extension of the regulated utility, compared to the Company's relationship with Allconnect?

18 A. Mr. Ives' surely cannot genuinely believe that the Company's relationship with
19 Allconnect and Staff's current complaint may jeopardize the successful and appropriate
20 contractor relationships Missouri regulated utilities currently have and have had with third
21 party vendors that perform utility related core or, essential or necessary services. As stated
22 previously, there *is no comparison* between Allconnect and third party contractors that
23 perform essential utility work that benefits both the utility and their customers in the provision
24 and receipt of safe and adequate service at just and reasonable rates. To my knowledge Staff's

1 focus has always been utility service and performance related concerns. Staff has raised
2 nonutility service and performance concerns when those items have interfered with the
3 provision of utility service.

4 Q. On page 19 of his rebuttal testimony Mr. Ives agrees that the "No-Call List" is
5 an indication of customer desire to not receive telemarketing calls but indicates that customer
6 service connection calls are not forced by KCP&L-GMO to transfer to Allconnect. How do
7 you respond?

8 A. In my response to Ms. Trueit's rebuttal testimony above on page 9, lines 8
9 through 19 of my Direct Testimony, I indicated that the sending of the regulated customer's
10 confirmation number to Allconnect gives the customer the impression that he or she *must* be
11 transferred to Allconnect.

12 Q. Do you agree with the statement on page 20, lines 7 and 8 of Mr. Ives
13 testimony that the "Company does not force customers to transfer to Allconnect?"

14 A. Yes and No. Practically speaking customers can "hang-up" or assert
15 themselves against the direction of the KCP&L-GMO call center representatives whose
16 very scripts inform customers: "Now I am going to transfer you to Allconnect."³⁵ But the
17 indication to customers, by design of the "no customer consent – Confirmation Model," is
18 that *their call must be transferred* in order to get the "confirmation number" that provides
19 some level of assurance that the connection of electric service has truly been scheduled.
20 KCP&L-GMO has provided information that 80% of the eligible customers are actually
21 transferred to Allconnect with 20% not transferred.³⁶

³⁵ Company Response to Informal Staff Information Request to Question No. 2 and File No. EW-2013-0011
Company Response to Staff Data Request No. 89.

³⁶ File No. EC-2015-0309 Company Response to Staff Data Request No. 57.

1 Q. Mr. Ives includes three points on page 21, lines 8 through 17 of his rebuttal
2 testimony regarding the request of a variance to 4 CSR 240-20.0152(2)(C). Please respond to
3 each point.

4 A. KCP&L-GMO would respectfully request that the Commission grant such a
5 variance because KCP&L-GMO's relationship with Allconnect is beneficial to customers
6 because:

7 1) KCP&L-GMO appropriately assigns and allocates costs and revenues related to the
8 Allconnect relationship to prevent subsidization of nonregulated activities by rates paid by
9 regulated customers.

10 Response: First and foremost customers should be asked their permission before
11 transferring their call and information to Allconnect and should first be given their
12 confirmation number. Then they should be credited for their sale of their customer data and
13 their calls through their customer rates. All dollars should be "above the line."

14 2) Periodic and regular customer surveys purportedly demonstrate that KCP&L-
15 GMO's relationship with Allconnect improves overall customer satisfaction levels;

16 Response: Ms. Trueit's rebuttal testimony provided survey results that demonstrate
17 11 to 17.7% of customers found Allconnect to negatively impact their perception of KCP&L-
18 GMO. Negative customer "verbatim" (Schedule LAK s3) not included in Ms. Trueit's
19 testimony demonstrate a level of dissatisfaction, Allconnect process inefficiencies and
20 inaccuracies that cannot be represented by survey results percentages. Further, listening to
21 recorded phone calls provides a method of analysis addressed in Staff's investigation like
22 none other. To Staff's knowledge regarding the topic of call recordings, the transcriptions
23 presented in Staff's Investigation Report attached to Complaint filed in File No. EC-2015-

Surrebuttal Testimony of
Lisa A. Kremer

0309 and Staff's discussion of its findings in listening to KCP&L-GMO call recordings, not addressed by KCP&L-GMO.

Some other customer "verbatim" from recorded phone calls Staff has listened to include the following:

** _____ **

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** _____ **

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** _____ **

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** _____ **

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** _____ **

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3) Termination of the Allconnect relationship would slightly increase costs and rates paid by customers due to the fact that KCP&L-GMO would need to replace the

1 customer order and account verification function currently performed by Allconnect at
2 no charge to the Company.

3 Response: KCP&L-GMO would not need to replace the customer order and account
4 verification process allegedly performed by Allconnect. As discussed previously in my
5 surrebuttal testimony KCP&L-GMO, as all other regulated utilities in the State of Missouri,
6 for decades successfully functioned by taking requests for electric service and verified
7 account information without the aid of Allconnect. KCP&L-GMO call center representatives
8 *do verify* and their performance is evaluated on verifying customer information as well as
9 their "transactional accuracy" in processing customer requests. In fact, 35% of the evaluation
10 criteria of KCP&L-GMO call center personnel is weighted on "Verification and Transactional
11 Accuracy"³⁷(Schedule LAK-s8). Informal responses dated June 27, 2013 in an e-mail from
12 Tim Rush to Staff when it began its inquiry of KCP&L-GMO's relationship with Allconnect
13 demonstrates KCP&L-GMO is not dependent upon Allconnect to perform services for the
14 regulated utilities:

15 " . . . Allconnect activity is considered below the line because this type
16 of activity is not essential to our core business. Direct costs will be
17 charged to account 817100 which will include Customer Service
18 Representative time on a call with an eligible customer informing them
19 of Allconnect."³⁸

20 What KCP&L-GMO did not do for decades before was "sell customer information
21 and customer phone calls" for ** _____ ** and Staff argues, to the detriment of its customers.
22 KCP&L-GMO does not need Allconnect to serve its customers. KCP&L-GMO has a trained
23 call center force, the costs of which are included in its cost of service and born by its rate

³⁷ File No. EO-2014-0306 Company Response to Staff Data Request No. 52.

³⁸ Company Response to Informal Inquiry sent by Staff May 6, 2013 and responded to by Company on June 27, 2013.

1 payers. Allconnect, however, needs the customer calls and customer information sold to it by
2 KCP&L-GMO.

3 **CHARLES A. CAISLEY REBUTTAL:**

4 Q. Does Staff discovery in its investigation of KCP&L-GMO and Allconnect
5 support Mr. Caisley's statements, beginning on page 2 line 18 through page 3 line 8 of his
6 rebuttal testimony, that increasing customer satisfaction and overall customer experience was
7 the reason the Company decided to enter into its existing relationship with Allconnect.

8 A. No. As stated previously, the Senior Leadership Team Meeting Presentation,
9 Allconnect Program, dated January 19, 2013,³⁹ demonstrates a different emphasis; one that is
10 less about customer satisfaction and overall customer experience and more about

11 **

12 ** Further, Staff contends that
13 if KCP&L-GMO's primary interest is to increase customer satisfaction, then why would
14 KCP&L-GMO not seek customer consent before transferring calls to Allconnect? Staff
15 believes the answer is within the Ameren Missouri peer review notes described earlier in my
16 testimony (Schedule LAK-s7), which document low transfer rates (customers simply decline
17 being transferred when their consent is requested.)

18 Q. Mr. Caisley implies that the Staff Complaint filed against Puget Sound Energy
19 in Washington is different than the complaint filed by the Staff in the current complaint
20 against KCP&L-GMO. How do you respond?

21 A. While the Washington and Missouri Commission rules are different, the Staff
22 alleges that KCP&L-GMO is violating the Affiliate Transactions Rule 4 CSR-20.015(2)(C)

³⁹ File No. EW-2013-0011 Company Response to Staff Data Request No. 45.

1 because the Allconnect relationship to KCP&L-GMO is such that KCP&L-GMO is required
2 to seek customer consent before making specific customer information available to
3 Allconnect.

4 Q. Mr. Caisley states on page 4, lines 21 of his rebuttal testimony that Allconnect
5 verifies customer information, but aren't KCP&L-GMO customer service representatives
6 capable of also verifying customer information and providing a confirmation number?"

7 A. Yes and that is a normal and expected role for any regulated utility call center.
8 Staff has reviewed call center operational practices, to some extent, with all of the State's
9 largest regulated utilities including their customer service representative evaluation process
10 and Staff believes that the intent with each utility call center it has reviewed is for customer
11 information to be inputted correctly in their systems and that customer service representative
12 accurately verify customer data.

13 Q. Does Staff agree with Mr. Caisley's statement at page 5, lines 11 through 13 of
14 his rebuttal testimony that the revenue stream was a factor in the Company's decision but the
15 most important factor was customer satisfaction?

16 A. No. If customer satisfaction was the most important consideration for
17 KCP&L-GMO in its relationship with Allconnect, KCP&L-GMO *would seek customer*
18 *permission* before transferring calls and customer data. As it is and as discussed earlier, there
19 is considerable customer dissatisfaction with the manner in which KCP&L-GMO is
20 transferring customer calls and customer data.

21 Q. Is there any reason customer rates should be higher if the Company
22 discontinued its relationship with Allconnect as indicated by Mr. Caisley on page 6 lines
23 19 and 20?

1 A. No. KCP&L-GMO customer service representatives already perform the very
2 tasks that KCP&L-GMO say Allconnect performs.

3 Q. Page 7, lines 1 through 15 of Mr. Caisley's testimony seems to imply that
4 KCP&L-GMO must depend upon "vendors" who can provide mobile phone alerts, text
5 messaging, mobile device applications and e-mailing services and other innovative way to
6 reach and communicate with customers. Do you agree?

7 A. No. AmerenUE has a phone application that permits phone texts, bill paying,
8 reporting or checking for outages and other customer information. Utilities can find
9 numerous innovative ways on their own to communicate with customers.

10 Q. Beginning on page 8, line 17 of Mr. Caisley's rebuttal testimony he argues that
11 the **__** purchase rate for Allconnect along with customer satisfaction survey results
12 demonstrates that Allconnect is an attractive service to its customers. Do you agree?

13 A. No. As stated in my direct testimony, the percentage of customers purchasing
14 additional services does not include those who subsequently cancel services. In addition,
15 given the sales pitch training including training to rebut customer objections as has been
16 stated previously along with customer remarks of pushy Allconnect customer service
17 representatives, Staff cannot agree that customers are always buying services because they
18 want them. Considerable additional discussion has been made previously in my surrebuttal
19 testimony regarding customer satisfaction survey results and customer statements concerning
20 Allconnect.

21 Q. What do you find most concerning regarding Mr. Caisley's statements
22 beginning at page 9, line 11 of his rebuttal testimony where he acknowledges the pushing or
23 aggressive manner Allconnect handled its customers?

1 A. The recognition by KCP&L-GMO that Allconnect *is* pushy and the utility
2 continues to expose its customers to such treatment when it does not have to do so or at least
3 could request its customers consent before transferring their calls and information. As stated
4 previously, KCP&L-GMO is in effect creating the impression that their calls must be
5 transferred to Allconnect to get confirmation that they will receive connection to regulated
6 electric service as of a certain date.

7 Q. How do you respond to Mr. Caisley's statements on page 9 line 19 that the
8 occurrence of "bad" Allconnect calls is declining?

9 A. Staff asks why KCP&L-GMO would place its customers in such a position as
10 having to be exposed at all to any "bad" calls where Allconnect representatives are pushy,
11 aggressive, etc. without specific consent from its customers to have their calls transferred.

12 Q. How do you respond to Mr. Caisley's rebuttal testimony on page 10, lines 9
13 through 17 regarding Allconnect's incomplete list of service providers and his statement that
14 the "perfect should not be the enemy of the good?"

15 A. The manner in which customer calls and customer data are transferred to
16 Allconnect without customer permission *is not good*. There are reasons no other regulated
17 utility in the State of Missouri uses Allconnect in such a manner. Customer comments
18 and survey data does not bear out that Allconnect utilized in the manner KCP&L-GMO is
19 using it is in the interest of KCP&L-GMO regulated operations but does demonstrate that
20 Allconnect is in the interest of KCP&L-GMO non-regulated operations.

21 Q. Does this conclude your surrebuttal testimony?

22 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

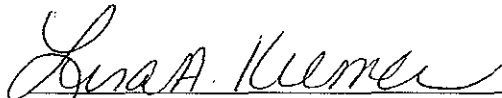
Staff the Missouri Public Service)
Commission, Complainant, vs. Kansas City) Case No. EC-2015-0309
Power & Light Company and KCP&L)
Greater Missouri Operations Company,)
Respondents)

AFFIDAVIT OF LISA A. KREMER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

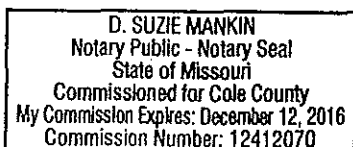
COMES NOW Lisa A. Kremer and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Surrebuttal Testimony and that the same is true and correct according to her best knowledge and belief.

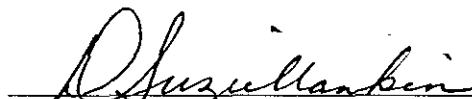
Further the Affiant sayeth not.


Lisa A. Kremer

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 17th day of December 2015.




Notary Public

**SCHEDULE LAK-s1
HAS BEEN DEEMED
HIGHLY CONFIDENTIAL
IN ITS ENTIRETY**



December 11, 2015

RE: Ameren Missouri New Connect Reports

Dear Municipality,

As you are aware, Union Electric Company d/b/a/ Ameren Missouri (Ameren Missouri) has been providing your community with a monthly report (the "New Connect Report"), which provides a high level summary of new residential and commercial service provided by Ameren Missouri at identified service locations within your community during the applicable month.

Recently we performed an internal review of this practice in light of the ever increasing regulations related to the protection of personal information, as well as information that relates to our current or new customers. This internal review has led to a decision to **cease the practice of providing the New Connect Reports effective October 1, 2015.**

Ameren Missouri will continue to provide the New Connect Reports for August and September of 2015, and will refund any amounts that have been collected from the municipality associated with reports issued during calendar year 2015.

Should you have any questions upon receipt of this letter you may contact me at 314-554-2229, or by email at pselby@ameren.com.

Sincerely,

Page

Page Selby
Business & Community Relations
Ameren Missouri
1901 Chouteau Avenue
St. Louis, MO 63166

Schedule LAK-s2

SCHEDULE LAK-s3
HAS BEEN DEEMED
HIGHLY CONFIDENTIAL
IN ITS ENTIRETY

Correction Report			
2015	Call Transfers	Received	Corrected
January	6,198	933	25
February	6,983	1013	28
March	8,021	1037	22
April	8,268	1128	35
May	8,895	1088	30
June	9,654	1135	22
July	9,800	1240	30
August	8,892	1137	36
September	7,117	805	29
October	6,913	701	22
Total	80,741	10,217	279

12.65% potential corrections identified (received / transfers)

0.345% corrections made per total transfers (corrected / transfers)

SCHEDULE LAK-s5
HAS BEEN DEEMED
HIGHLY CONFIDENTIAL
IN ITS ENTIRETY

KCPL and KCPL GMO
Case Name: KCPL/GMO Allconnect Complaint
Case Number: EC-2015-0309

Response to Dottheim Steve Interrogatories - MPSC_20151125
Date of Response: 12/04/2015

Question:0051

Ms. Trueitt states at page 12, lines 20-21 of his rebuttal testimony that "[c]ustomers are permitted free form comments to accompany scoring" and indicates that her Schedule JAT-7 is a list of positive responses customers gave on the October 2015, Allconnect Tracking Study. (a) Were customers only permitted to enter positive comments to accompany scoring? (b) If customers were permitted to enter non-positive comments to accompany scoring, please provide copies of the non-positive comments which were submitted by customers.

Response:

(a) No.

(b) See attached verbatim file for all comments from the October 2015 Allconnect Tracking Study. (Q0051_Allconnect Tracking Study Verbatims_October2015)

Response Provided By: Erica Penner

Attachment:

Q0051_Allconnect Tracking Study Verbatims_October2015.xls

Q0051_Verification.pdf

**Kansas City Power & Light Company and
KCP&L Greater Missouri Operations Company
CASE NO. EC-2015-0309
Customer Negative Responses
Data Request No. 51**

1. Check your information on services available. I was promise 100 mbps internet which I was very excited to be able to have. Not only was that speed not available in my area, the company that was to provide the service doesnt even service my area
2. Confusing
3. Dont offer the service. You do not provide all the information - in this case that I would have a cancellation fee with ATT by letting YOU sign me up as a new customer
4. Dont try to sell things not requested
5. I didnt care to hear all the offers after I already said I had cable services started
6. I had to repeat my information multiple times, over and over. This was done within seconds of each other. The length of the phone calls were so long that I had to let the representative go each time. Whatever caused them to have to ask me to repeat my self so much should definitely be corrected.
7. I was told that I would be able to get my Internet installed two days from the date I set my service up through this company. I found out the next day that the date the CSR had given me was merely an estimate, even though she confirmed the time window and stated that it was all set. Now I wont have any connectivity for nearly two weeks from when i opened my service through your company
8. I was worried the entire time that I was placing an order instead of just learning and having a packaged deal that I CAN order. I am actually still unsure and will be furious if I am charged for the offered deal without further consent.
9. I would have liked to have more information about what exactly the benefit of the service was. Im still not sure why signing up for TWC through you guys was any different than just going direct to TWC, what the benefit was to me. And it seemed to take quite a bit of Q&A between myself and the rep to leave me satisfied going through you guys wouldnt overcomplicate the issue.
10. If I say I dont want Dish Network, then the customer service rep should stop asking if I want.
11. It was alright. Just took a long time and I got set up with TV, which I didnt want.

-
12. not be so pushy about setting up other services. i eventually just hung up after saying no several times
 13. Not push Time Warner so hard with only one option to choose from.
 14. Not sure what Allconnect was
 15. On hold for 20 min
 16. The call lasted FOREVER and the lady we talked to repeated herself over and over and constantly asked us the same questions. Then to top it off, I contacted some of the service providers that were supposedly setup for our move and they had no record that we were moving. I had to go through and contact 2 of my service providers and setup my move myself even though Allconnect was suppose to do it. Not very happy with this service at all.
 17. The gentleman charged my card and it didnt go through and told me that the payment had been processed and then I tried to get my service changed and they said I still owed 137
 18. The lady was talking so fast and she signed me up for a service that I really didnt want.
 19. The representative that I spoke with was incredibly pushy to sell me new internet and tv services. I told her at least 10 times I was not interested.
 20. The woman I spoke with on the phone mislead me about pricing. She said I would be receiving a 50mbps inet speed for 37.99. In reality I would have been receiving 10 mbps for 47.99 Thankfully I called time warner and found out I had been lied to before. I was able to cancel my service before they came out and hooked up. I will not be going through allconnect again anytime soon.
 21. Too much noise in background to hear. Your person was more interested in reading her questions and statements rather than listening. She insisted that I had to open a new account with AT&T so she took my information and did a credit check even though I already have an account with AT&T. I was uncomfortable so I called AT&T and confirmed that all I had to do was transfer my existing account (NOT OPEN A NEW ACCOUNT). AT&T had to cancel your order and issue a new move order on my account. I was not happy with how I was railroaded into this by your company especially since I kept telling the person that I had service people at my home and all I needed was my confirmation number for KC&L.
 22. Try to not be so pushy
 23. Was told I could not receive time Warner services at my address but spoke to time Warner directly and was set up the next day.
 24. Was unable to reach you - put on hold every time I called. Very poor service

25. We were told after setting up Kcpl we could also set up our Att. We were given the date 16th from 2-4 for them to be at our house for set up. We took off work and Att did NOT come until the 17th from 1-3 so we had to take off work again that day after we called the 16th asking why they werent there when we were told by AllConnect they said that was the scheduled date which it wasnt what we were told.

26. When my electric company transferred me, they didnt really prepare me for the onslaught of information that Id be taking in and/or making decisions on with the transfer of my call. That being said, it was nice to have cable information consolidated for me so I didnt have to make multiple calls. I really appreciated that. But it was completely overwhelming.

**SCHEDULE LAK-s7
HAS BEEN DEEMED
HIGHLY CONFIDENTIAL
IN ITS ENTIRETY**

Form Name: KCP&L Quality Monitoring Form

Evaluator:

Agent:

Phase I: Introduction to the Call: Control and establish the tone of the call by applying Human Dimension elements first and authenticating data second.

Greeting & Transition (5 points)

Agent greeted customer promptly (2 points)

- ☐ Yes
☐ No

Agent used transition statement (if applicable)

- ☐ Meets Expectations (3 points)
☐ Partially Meets Expectations (2 points)
☐ Does Not Meet Expectations (0 points)
☐ N/A

Verification (15 points)

Agent verified caller information

- ☐ Yes (15+ points)
☐ No SS# (0 points)
☐ No address (5+ points)
☐ No phone (5+ points)
☐ No name (5+ points)
☐ No (combo) (0 points)

Phase II: Action for Satisfaction: Apply STAR qualities to maximize customer loyalty and confidence, as well as minimize callbacks and rework.

Listening and Fact Finding (10 points)

Agent responded to customer cues regarding their situation and asked questions as needed to identify issues (10 points)

- ☐ Yes
☐ No

Transactional Accuracy (20 points)

Agent processed request accurately (10 points)

- ☐ Yes
☐ No

Agent included all pertinent detail in the CC?

- ☐ Yes or N/A (10 points)
☐ Yes (no details) (2 points)
☐ No CC
☐ N/A

Problem Solving (10 points)

Agent educated and answered questions (7 points)

- ☐ Yes
☐ No

Agent proactively offered appropriate solutions (3 points)

- ☐ Yes
☐ No

Phase III: Leave a Positive Impression: Strengthen customer loyalty by being attentive and sincere. Make the customer feel understood, respected and valued. Ensure mutual understanding of situation and resolution so that customer knows their needs will be met.

Professionalism & Concern (20 points)

Agent projected willingness to help and valued customer time (10 points)

- ☐ Yes
☐ No

Agent used professional language and avoided company jargon, ensuring hidden dimensions stays hidden (10 points)

- ☐ Yes
☐ No

Summarization and Closing (20 points)

Agent addressed needs, provided a clear summary and set expectations of next steps (15 points)

- ☐ Yes
☐ No

Agent closed with "Thank you for calling KCP&L" (5 points)

- ☐ Yes
☐ No

Summary

Rating:

- ☐ Unacceptable
☐ Needs Improvement
☐ Meets Expectations
☐ Exceeds Expectations

Comments: