

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Staff Investigation into the	)	
Adequacy of the Call Centers Serving Missouri	)	<b><u>File No. WO-2014-0362</u></b>
American Water Company	)	

**STAFF'S STATUS REPORT AND MOTION FOR LEAVE TO FILE OUT-OF-TIME**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Status Report and Motion for Leave to File Out-of-Time*, states as follows:

***Status Report:***

1. On June 20, 2014, Staff moved the Commission to open an investigation of the adequacy of the customer service call centers operated by Missouri American Water Company ("MAWC").

2. On June 25, 2014, the Commission by order directed the Staff to conduct the requested investigation. The Commission further ordered the Staff to file either its final report or a status report regarding its investigation no later than August 4, 2014.

3. Staff filed a *Status Report* on August 4, 2014, because its investigation was not yet complete. Staff filed additional *Status Reports* on September 8, 2014, October 6, 2014, November 12, 2014, and December 5, 2014.

4. Staff's investigation is still not completed. Staff continues to conduct activities designed to gather relevant information concerning the performance of MAWC's call centers.

a. **Data Requests ("DRs"):** Staff has submitted 96 DRs to MAWC, including 13 submitted as recently as December 23, 2014, due on January 12, 2015. MAWC has timely responded to Staff's DRs, with the

exception of those issued on November 12, 2014. Technical issues impeded timely responses to the DRs submitted on November 12, 2014, and they were re-submitted on December 4. MAWC provided responses by December 12. Staff and MAWC personnel have worked cooperatively to clarify Company responses to Staff's data requests. To date, all requested clarifying information has been provided. Staff is developing additional data requests that will be submitted this week and is attempting to schedule a meeting with the Company to review data request responses.

b.     **Consumer Complaints:** Complaints, both formal and informal, and calls from consumers received by the Commission's Consumer Services Unit also provide data concerning the performance of MAWC's call centers.

c.     **Site Visits:** Staff met with Company personnel at the Alton, Illinois, Call Center on Tuesday and Wednesday, October 7 and 8, 2014. Staff conducted interviews of Company personnel and performed call monitoring at the Call Center in order to collect first-hand observations of the performance of MAWC representatives. Staff again conducted interviews of Company personnel at the Alton, Illinois, Call Center and performed call monitoring of the Call Center representatives at the Alton, Illinois, Call Center and the Pensacola Call Center on Wednesday and Thursday, October 29 and 30. Staff conducted additional interviews of Company personnel at the Alton, Illinois, Call Center on Tuesday and Wednesday, January 13 and 14, 2015. Staff is currently attempting to schedule a tour of the Company's workforce management facility at Belleville, Illinois.

d. **Meetings and Conference Calls:** Staff continues to meet periodically or conduct conference calls with MAWC personnel regarding the Company's call center performance, as well as other customer service quality concerns, including those identified in Case No. WC-2014-0138, most recently on Thursday, November 6. Case No. WC-2014-0138 is a consolidation of the Public Counsel's complaint and multiple formal complaints from customers within the Company's Stonebridge service territory. In the context of Case No. WC-2014-0138, the Staff made five recommendations to Missouri American Water Company regarding its call center performance and Staff anticipates its current investigation will encompass those recommendations. Company personnel and Staff had a teleconference on Thursday, January 29, 2015.

e. **Review of Recorded Customer Calls:** Staff has listened to a number of recorded phone calls of customers to the Company's call centers in the context both of this investigation and Case No. WC-2014-0138 and plans to listen to more. Staff and the Company continue to work together to resolve issues relating to Staff's physical possession of recorded Call Center calls for listening at the PSC's offices in Jefferson City. This is an important issue because physical possession of recorded calls is sometimes necessary for Staff to listen to calls repeatedly; to engage additional Staff experts as the demands of other business may allow; and to transcribe calls when litigation needs so require. Staff notes that no other regulated entity operating in Missouri has refused to permit Staff to take physical possession of recorded calls. Of course, if necessary, Staff will serve subpoenas on MAWC in order to require that

recorded calls be turned over. Company personnel brought certain recorded calls to Jefferson City for Staff to review in the presence of the Company at the Governor Office Building on Tuesday and Wednesday, February 3 and 4, 2015.

5. When Staff's investigation is complete, it will prepare a report to file with the Commission and anticipates providing a draft of its report to MAWC for review and comment prior to its filing in EFIS. Staff will inform the Commission on March 6, 2015, of its progress in this case, unless it completes its investigation and files its report sooner.

***Motion for Leave to File Out-of-Time***

6. In its *January Status Report*, Staff stated that it would file its *February Status Report* on February 6, 2015. However, due to the press of other business, to-wit, the filing of Surrebuttal Testimony in the Ameren Missouri electric rate case, Case No. ER-2014-0258, and settlement negotiations in Case Nos. GC-2014-0216 and EO-2012-0142, the undersigned was distracted and failed to file this *February Status Report*. Staff offers its apologies to the Commission for the oversight.

**WHEREFORE**, the Staff submits its February Status Report and prays that the Commission will accept it although it is filed out-of-time.

Respectfully submitted,

**/s/ Kevin A. Thompson**

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 9<sup>th</sup> day of February, 2015, on counsel for Missouri American Water Company and on the Office of the Public Counsel.

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**/s/ Kevin Thompson**