

**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)	<u>File No. WO-2014-0362</u>
American Water Company)	

**STAFF’S REPLY TO THE RESPONSE OF MISSOURI-AMERICAN
TO STAFF’S FINAL REPORT AND MOTION FOR ORDER REQUIRING COMPANY
TO COMPLY WITH STAFF’S CONTINUED MONITORING**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and hereby tenders its *Reply to the Response of Missouri-American to Staff’s Final Report*; attached hereto as Attachment A.

Staff agrees that this docket may now be closed, but requests the Commission to order that Missouri-American do the following:

1. Order the Company to submit “Implementation Status Reports” to the Staff until all Company commitments identified in its July 20th, 2015, response have been completed, specifically commitments regarding Recommendation 3, Recommendation 6, Recommendation 7, and Recommendation 9. Such “Implementation Status Reports” should include the Company’s implementation plan for each recommendation, a description of the Company’s actions taken to date and dates actions were accomplished. Such Implementation Status Reports should be provided on a quarterly basis and be discontinued at such time that the Staff concludes the Company has sufficiently met the intent of the recommendations.

2. Order the Company to provide the studies, analysis and audits (Recommendations 3 and 7) that the Company’s response indicates it is currently performing or will perform in response to Staff’s recommendations.

3. Order the Company to continue meeting with the Staff as determined necessary by Staff to address call center and other service quality performance matters as they arise and to discuss the Company's progress regarding the recommendations made in this case and other topics.

These actions are requested in order to permit Staff to continue to monitor Missouri-American's progress toward resolving all identified Call Center and customer service issues.

WHEREFORE, the Staff prays that the Commission will make the aforesaid orders and close this docket; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Kevin A. Thompson

Kevin A. Thompson
Chief Staff Counsel
Missouri Bar No. 36288
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-6514 (Telephone)
(573) 526-6969 (Fax)
kevin.thompson@psc.mo.gov (e-mail)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically, by hand delivery or by First Class United States Mail, postage prepaid, on this 5th day of August, 2015, on counsel for Missouri American Water Company and on the Office of the Public Counsel.

/s/ Kevin A. Thompson

**STAFF'S RESPONSE TO THE COMPANY'S RESPONSE
TO STAFF'S FINAL REPORT**

CASE NO. WO-2014-0362

**MISSOURI-AMERICAN WATER COMPANY CALL CENTERS
ENGINEERING AND MANAGEMENT SERVICES UNIT**

Lisa Kremer and Debbie Bernsen

The Staff has reviewed the Company's response , "MAWC's Response to Staff's Final Report," to Staff's report, "Report of Staff's Findings Into the Adequacy of the Call Centers Serving Missouri American Water Company," filed in Case No. WO-2014-0362. The Company's response was filed July 20th, 2015.

The Staff is generally satisfied with the Company's response to its report at this time and the actions the Company has both completed to date and indicates it plans to complete to improve the performance of its call center. Based upon the Company's response, the Staff submitted additional inquiries to the Company on July 23, 2015, regarding the Company's specific implementation plans and performance metrics related to recommendations 2, 4, 6, 7 and 9.¹ The Staff and Company discussed these inquiries on July 24, 2015 and the Company provided its written response on August 4, 2015. The Staff's inquiries and the Company's response are both attached as Schedule 1 and Schedule 2.

All of Staff's recommendations were made with the intent of improving the Company's call center deficiencies that were identified during the course of Staff's investigation in the current case as well as in Case No. WC-2014-0138. Of those recommendations, the Staff believes the implementation of Recommendation 9 (below) is most critical toward sustained call center improvement. Recording phone calls will improve the Company's ability to monitor and control the operations and performance of its call center and will further serve to demonstrate that the Company has successfully implemented Recommendations 1, 2, 4 and 5 in the Staff Report.

¹ The Company's July 20, 2015 response entitled: "MAWC's Response to Staff's Final Report" used an alphabetical instead of numerical listing for the sequence presentation of each recommendation as was originally provided in Staff's report. For example, the Company's recommendation A. is Staff's report recommendation 1; the Company's Recommendation B. is Staff's report recommendation 2. etc.

Recommendation 9:

Record 100 percent of all customer calls between Call Center Representatives and Missouri-regulated customers. Archive recorded phone calls for a period of no less than 12 months and in a manner that they be retrieved and reviewed by the Company, Staff and OPC.

As stated in the report, “Report of Staff’s Findings Into the Adequacy of the Call Centers Serving Missouri American Water Company,” Staff is aware of no other large Missouri regulated utility that does not record 100 percent of its call center calls. Call recordings are critical in verifying that call center representatives have appropriate training to respond to customer inquiries, customer account notes are accurate, requests for call escalations are appropriately performed, that Company information relayed to its customers is consistent with Commission rules and Company tariffs, customers are treated courteously and customer-requested follow-up phone calls are performed. Many of these performance matters were the subject of recommendations 1, 2, 4 and 5 in Staff’s report. While the Company has taken positive actions toward these recommendations, recorded phone calls compared in conjunction with customer account notes, generated service orders, customer payments, complaints and other documentation provide an element of call center assessment like none other.

While the Company has made or committed to make significant progress toward improving its call center operations, the Staff requests that the Commission:

- 1.) Order the Company to submit “Implementation Status Reports” to the Staff until all Company commitments identified in its July 20th, 2015 response have been completed, specifically commitments regarding Recommendation 3, Recommendation 6, Recommendation 7 and Recommendation 9. Such “Implementation Status Reports” should include the Company’s implementation plan for each recommendation, a description of the Company’s actions taken to date and dates actions were accomplished. Such Implementation Status Reports should be provided on a quarterly basis and be discontinued at such time that the Staff concludes the Company has sufficiently met the intent of the recommendations.
- 2.) Staff also requests that the Commission order Missouri American to provide the studies, analysis and audits (Recommendations 3 and 7) the Company’s response indicates it is currently performing or will perform in response to the recommendations.

- 3.) The Staff further requests that the Commission order Missouri American to continue meeting with the Staff as determined necessary by Staff to address call center and other service quality performance matters as they arise, to discuss the Company's progress regarding the recommendations made in Case No. WO-2014-0362 and other topics.

The Staff respectfully requests that the Commission order Missouri American to comply with the above requirements and indicates, as a result of such order, the Staff believes the current docket can be closed. Should significant call center performance concerns continue, the Staff may request the docket be reopened or may request the Commission's permission to file a formal complaint.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Staff's Investigation into
the Adequacy of the Call Centers serving
Missouri American Water Company

)
)
)
)
)

Case No. WO-2014-0362

AFFIDAVIT OF DEBBIE BERNSEN

STATE OF MISSOURI)

)

ss.

COUNTY OF COLE)

)

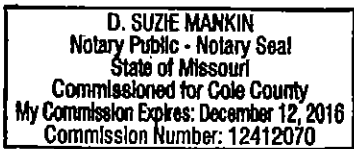
COMES NOW Debbie Bernsen and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff's Response To The Company's Response To Staff's Final Report*; and that the same is true and correct according to her best knowledge and belief.

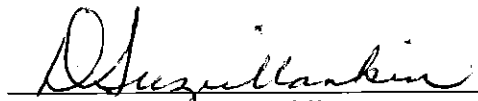
Further the Affiant sayeth not.


DEBBIE BERNSEN

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 5th day of August, 2015.




Notary Public

Doreen Hankin
Notary Public

Additional Staff Inquiries to Missouri American Water Company

With regard to the Company's response to Recommendation 2, please indicate whether the Company plans to or is presently tracking and/or reviewing performance metrics resulting from the scheduling of its supervisors for time to handle escalated calls, i.e., the number of escalated calls handled by each supervisor, the number of escalated calls that were unable to be responded to and the causes for such non-response. Please indicate whether the Company tracks customer complaints that allege their call was denied escalation.

With regard to the Company's response to Recommendation 4, please indicate if the Company has a process in place to verify the return of supervisory calls including the identification of outstanding or unreturned supervisory calls.

With regard to the Company's response to Recommendation 6, please provide the Company's implementation plan, time schedules including dates of anticipated completion to monitor the types of inbound calls the call center receives.

With regard to the Company's response to Recommendation 7, please indicate whether the feasibility study and impact analysis currently underway is being performed internally or externally and a description of the scope of the study.

With regard to the Company's response to Recommendation 9, please provide a description of all known aspects to the recordings including but not limited to: specific recording software and hardware that will be purchased or leased, whether supervisory calls will be recorded and anticipated period of time for archival.

FOLLOW UP ANSWERS FOR LISA KREMER

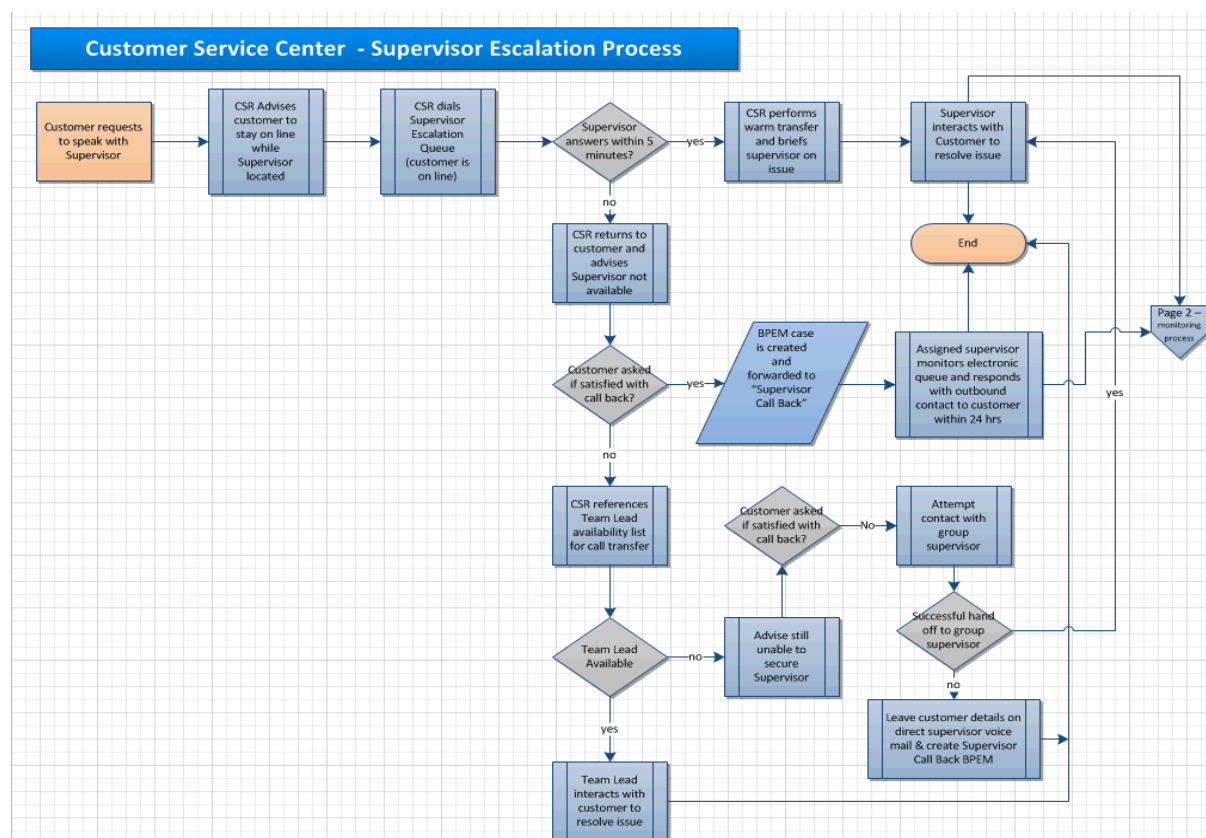
2. With regard to the Company's response to Recommendation 2, please indicate whether the Company plans to or is presently tracking and/or reviewing performance metrics resulting from the scheduling of its supervisors for time to handle escalated calls, i.e., the number of escalated calls handled by each supervisor, the number of escalated calls that were unable to be responded to and the causes for such non-response. Please indicate whether the Company tracks customer complaints that allege their call was denied escalation.

Yes. The company currently tracks the performance metrics. This includes the number of escalated calls, the average speed of answer, the number of calls per supervisor and the phone statistics of each supervisor. In addition, we track the number of calls that are we are unable to be respond to. We are not currently tracking the cause of any non-response.

The company tracks escalations and if a customer states they have been denied a supervisor we transfer to a supervisor at that time.

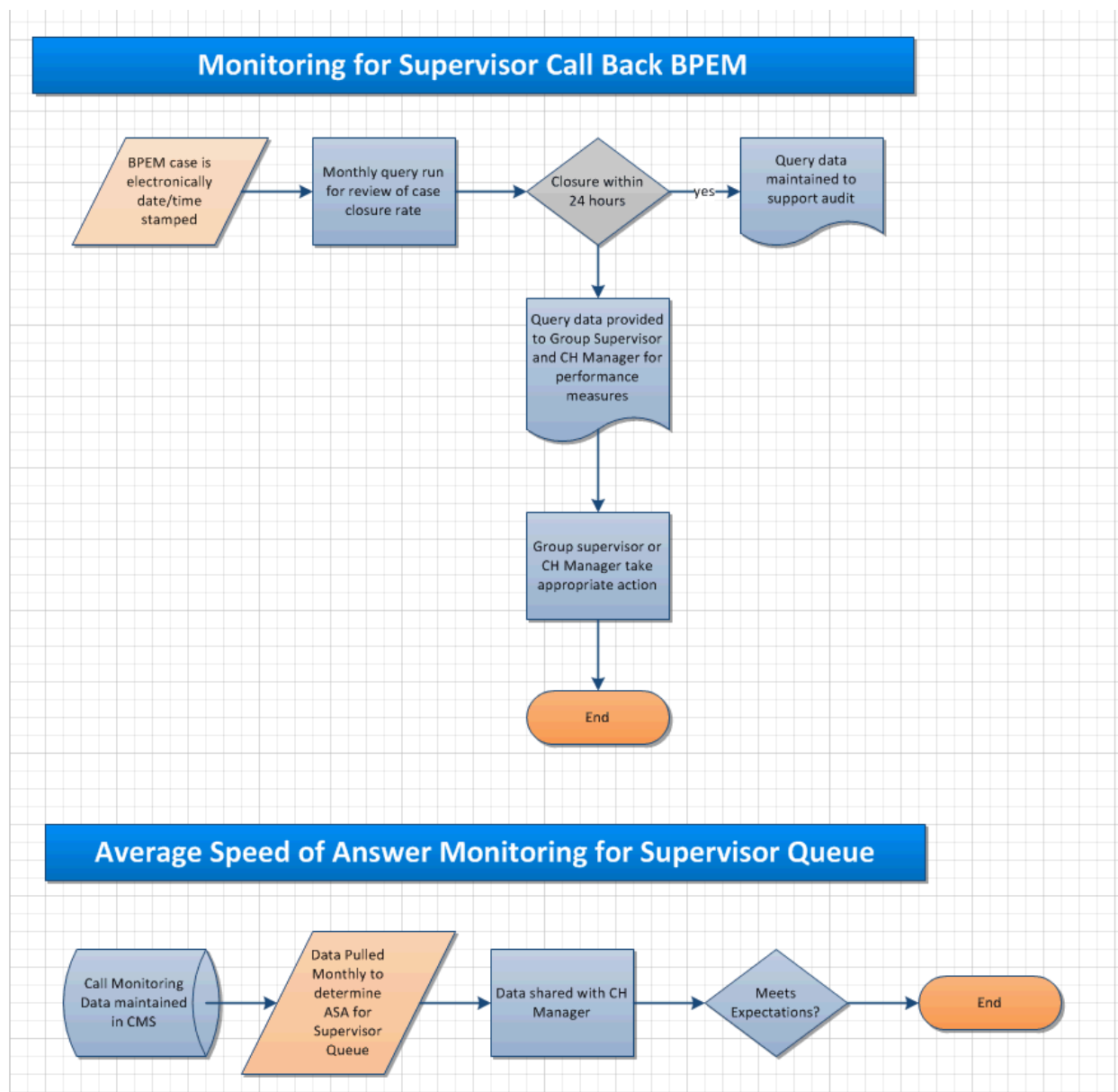
The escalation database is reviewed monthly to identify any trends or patterns.

4. With regard to the Company's response to Recommendation 4, please indicate if the Company has a process in place to verify the return of supervisory calls including the identification of outstanding or unreturned supervisory calls.



If a supervisor is not available immediately and the customer does not want to wait a is created and sent to the supervisor group “box”. Supervisors are scheduled to monitor the box and work the customer requests.

The BPEM is time stamped when it is originally created and when it is worked. A report is created each month and reviewed to ensure timely responses are provided to the customers.



6. With regard to the Company’s response to Recommendation 6, please provide the Company’s implementation plan, time schedules including dates of anticipated completion to monitor the types of inbound calls the call center receives.

The Call Center is currently working with the telecommunication team to develop and build the call routing vectors by skill and state. The target date is to have Missouri call routing implemented by October 1, 2015.

With regard to the Company's response to Recommendation 7, please indicate whether the feasibility study and impact analysis currently underway is being performed internally or externally and a description of the scope of the study.

The current study is being performed internally and includes an analysis of potential impacts to call routing changes, staffing levels and customer satisfaction. Items that are being analyzed include, but are not limited to, historical call volumes and patterns, call volumes by time zones, states with similar regulatory statutes, required additional technology (if any), any impact to staffing levels and increased knowledge of reduced geographic area., etc.

9. With regard to the Company's response to Recommendation 9, please provide a description of all known aspects to the recordings including but not limited to: specific recording software and hardware that will be purchased or leased, whether supervisory calls will be recorded and anticipated period of time for archival.

We will be expanding the current system which is through a company named NICE Systems. We are purchasing 100 additional licenses to have the ability to record 100% of the calls. The supervisory calls will be recorded. All calls will be archived for 12 months.