

**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) **File No. WO-2014-0362**
Missouri-American Water Company)

MAWC'S RESPONSE TO STAFF'S FINAL REPORT

COMES NOW Missouri-American Water Company (MAWC or Company) and, in response to Staff's Final Report, respectfully states the following to the Missouri Public Service Commission (Commission):

1. On June 15, 2015, the Staff of the Commission (Staff) filed its Final Report in this matter. The Report contained nine recommendations for action to be taken by MAWC.

2. Thereafter, Commission issued its Order Directing Missouri-American to Respond to Staff's Report. That Order required MAWC to respond to the nine recommendations, to include a plan for implementing Staff's recommendation as appropriate, no later than July 24, 2015.

3. In accordance with the Commission's Order, MAWC provides the nine Staff recommendations followed by MAWC's response:

- A. Ensure that Customer Service Representatives are sufficiently trained to respond in a timely manner to all customer inquiries including those regarding customer billing statements, service territories served and other inquiries. Evaluate training materials periodically and the manner in which Call Center representatives are trained regarding issues such as billing calculations, wastewater usage calculations, service territories and make improvements when necessary.**

MAWC Response: In order to comply with this recommendation, the Customer Service Center (CSC) Training & Education Manager will meet regularly with the MAWC leadership team to conduct a review of all training material to ensure the information accurately represents MAWC preferences and aligns with Commission rules and regulations for utility customer service, billing and collection activities. When there are changes in preference, rules or regulations that

result in the need for modification to training content, the CSC Training & Education Manager will collaborate with MAWC staff on these updates and receive confirmation that updated training material meets their expectations.

B. Implement methods to ensure that the Company's Call Escalation Policy is followed and reviewed periodically to ensure compliance for all Missouri calls.

MAWC Response: In February 2015, the CSC revised the escalation process to enhance the accountability and accessibility of the call handling supervisors. This was accomplished by specifically scheduling all supervisors for time in which their primary duty is to handle any escalated calls.

C. Perform a comprehensive operational audit of the American Water Works Company, Inc. Call Centers that serve MAWC customers. The audit should commence in calendar year 2016 and include but not be limited to operational areas such as: call quality control, adherence to Company Call Center policies and procedures, accurate and timely responses to customer inquiries including those regarding billing, appropriate call escalation to supervisory personnel, verification of return calls to customers, accurate calculation of bills from multiple Missouri service territories with differing tariffs and call center performance metrics.

MAWC Response: MAWC will be conducting an audit in the calendar year 2016 that will address all of the points provided in this recommendation.

D. Design and implement a procedure to ensure all Missouri American customers requesting a return or follow-up phone call from the Company's Call Center, including those requested from supervisory personnel, have their calls returned.

MAWC Response: There is a mechanism in place within the Customer Information System to electronically capture a request for a supervisor call back in the event a supervisor is not readily available. These requests are visible within the system and are date and time stamped. Once the supervisor has made contact with the customer, the electronic notification is manually closed and marked completed in the system. Reporting is available to capture the amount of time between the initial request and the call back by the supervisor. Items in the work queue are periodically

reviewed by the Call Handling Group Supervisor to ensure compliance with the call back process.

- E. Ensure that all Missouri customer calls to the Company's Call Center are documented with detail on the customer's account and include steps and Company commitments made to obtain resolution.**

MAWC Response: The interaction record menu that is utilized by customer service representatives allows them to select the most appropriate category/task related to the customer contact. If there are multiple issues to be addressed, they can also be categorized in the same manner. Additional free form comments are entered to provide additional information related to the task/inquiry type. Call center documentation accuracy and detail is part of the quality assurance reviews of the customer service representatives.

- F. Develop a system to monitor the types of inbound calls received at the Company's Call Center so that the Company can identify critical customer reported trends and respond with corrective action if necessary.**

MAWC Response: The Call Center will soon have the ability to identify call volume by call type and state. Having this capability will allow the Workforce Management team to identify anomalies in call trends and escalate to CSC teams for root cause analysis and action plans.

- G. Evaluate the benefits of reducing the number of regulated utilities, in the American Water Works Company, Inc., in which Call Center representatives are required to be experts. Analyze the merits of specializing Call Center representatives into fewer states.**

MAWC Response: A feasibility study and impact analysis is currently underway to address this recommendation with a decision expected by year end 2015.

- H. Inform the Staff and the Office of the Public Counsel promptly when significant operational or service quality performance changes are planned or occur.**

MAWC Response: When a significant operational or service quality performances changes occur, notification will be provided.

- I. 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 may be retrieved and reviewed by the Company, Staff and OPC.**

MAWC Response: This has been under consideration for several months. As a result of that evaluation and this recommendation, the plan is to record and archive all Missouri calls by the end of this calendar year.

WHEREFORE, MAWC respectfully requests that the Commission find this Response to comply with the Commission's Order Directing Missouri-American to Respond to Staff's Final Report and, thereafter, issue such order as the Commission deems reasonable and just.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to the following on this 20th day of July, 2015:

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