

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

Staff of the Missouri Public Service Commission,	)	
	)	
	)	
Complainant,	)	
	)	
vs.	)	<b><u>File No. EC-2015-0309</u></b>
	)	
Kansas City Power & Light Company	)	
	)	
and	)	
	)	
KCP&L Greater Missouri Operations Company	)	
	)	
	)	
Respondents.	)	

**STAFF RESPONSE TO MAY 23, 2016 FILING OF KANSAS CITY POWER & LIGHT  
COMPANY AND KCP&L GREATER MISSOURI OPERATIONS COMPANY**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and replies to the May 23, 2016 filing of Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) and states that it is opposed to the three principal adjustments that KCP&L/GMO suggest to the Staff’s proposed KCP&L/GMO customer service representative script: (1) replacing the sentence “This is your electric service confirmation number \_\_\_\_.” with a KCP&L/GMO customer service representative prompt, (2) the addition of the words – “confirm your order for accuracy and” and (3) the striking of the words – “and your order information.” In support of the Staff’s position, the Staff states as follows:

1. On page 2, paragraph 6 of the pleading filed with the Commission on May 23, 2016, KCP&L/GMO characterize their new proposed script as “the script revisions proposed by Staff, subject, to minor adjustments.” Three of the “minor

adjustments” made by KCP&L/GMO undo major revisions proposed by the Staff in its proposed script filed on May 20, 2016.

2. KCP&L/GMO deleted and added back to the Staff’s proposed script, language that leads the customer to believe that he/she needs to stay on the line to be transferred to Allconnect to have his/her electric service order confirmed for accuracy. KCP&L/GMO state at page 3 of their May 23, 2016, filing that “[a]dding ‘*confirm your order for accuracy and*’ on the fourth line more accurately reflects what the Allconnect agent will do should the call be transferred.” (Emphasis added.) KCP&L/GMO also suggest striking the proposed sentence, “This is your electric service confirmation number \_\_\_\_\_.”, and in its place just noting in the prompt to the KCP&L/GMO customer service representative that the customer is to be given his/her confirmation number. KCP&L/GMO state at page 3 of their May 23, 2016, filing that this revision “provides more efficient direction to the CSR [customer service representative] and is likely to improve overall call handling.” These KCP&L/GMO rationales are nothing more than makeweight arguments.

3. These “minor adjustments” of KCP&L/GMO show that KCP&L/GMO intend to continue to engage in masking the true nature of the transaction with Allconnect by having the KCP&L/GMO customer service representatives tell customers that Allconnect will “confirm” the accuracy of the customer information already performed by them, the KCP&L/GMO customer service representatives. (File No. EC-2015-0309, April 27, 2016, *Report and Order*, p. 19). How clear must the Commission be with KCP&L/GMO that KCP&L/GMO are to achieve informed customer consent. As a result of the script alone, customers are to understand that they are able

to complete their electric utility service transaction with KCP&L/GMO without having to transfer to Allconnect. On pages 21-22 of the Commission's April 27, 2016, *Report and Order*, the Commission provided direction regarding the contents of the KCP&L/GMO customer service representative script as follows:

If KCP&L and GMO wish to continue their contractual relationship with Allconnect by transferring customer calls and related information, ***they [KCP&L and GMO] must ensure that customers understand*** that they have the option to transfer to Allconnect; ***that they can complete their business with KCP&L or GMO without having to transfer to Allconnect***; and that Allconnect is a third-party that offers services separate and apart from the services offered by the utility. ***KCP&L and GMO will need to modify the script used by their customer service representatives regarding the proposed transfer to Allconnect to obtain the informed customer consent.***

(Emphasis added.)

4. KCP&L/GMO proposes to delete from the Staff's suggested script, filed on May 20, 2016, language that directly addresses the Commission Rule that the Commission has held that KCP&L/GMO violated - 4 CSR 240-20.015(2)(C):

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

KCP&L strikes the words "and your order information" from the sentence, "May I transfer you and your order information to Allconnect at this time?" The transfer of customer information to affiliated or unaffiliated entities without the customer's consent is the literal language of 4 CSR 240-20.015(2)(C). The transfer of customers to affiliated or unaffiliated entities without the customer's consent is not the literal language of 4 CSR 240-20.015(2)(C). On page 3 of its May 23, 2016 filing, KCP&L/GMO state that "[d]eleting 'and your order information' from the sixth line eliminates needless

redundancy ('*and your order information*' is also included on the third line) and is likely to improve overall call handling." (Emphasis added.) The issue is not improving overall call handling, and whatever redundancy there is, is not needless. Again, KCP&L/GMO want to continue to engage in masking the true nature of the transaction with Allconnect by not mentioning the transfer of information at the very time permission of the customer is requested.

5. The Staff is not opposed to some of the suggestions of KCP&L/GMO in its May 23, 2016, filing, minus the three "minor adjustments" already addressed and rejected above by the Staff. The Staff as a consequence proposes the following revised script:

Mr./Ms. \_\_\_\_\_, [Verify ~~Customer~~ Order Information and Provide Confirmation Number] This is your electric service confirmation number \_\_\_\_\_. Now that I have completed your electric service order, I'd like to transfer you and your order information to our partner Allconnect, a company that can ~~confirm your order for accuracy and~~ assist you with the transfer or setup of home services, such as TV and Internet. May I transfer you ~~and your order information~~ to Allconnect at this time?

*If customer's answer is "yes", the call is transferred.  
If customer's answer is "no": ~~the call is concluded.~~<sup>1</sup>*

~~Mr./Ms. \_\_\_\_\_, your call is complete. Thank you for calling KCP&L or GMO.~~

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<sup>1</sup> For clarity, the entire script would read as follows:

Mr./Ms. \_\_\_\_\_, [Verify Order Information and Provide Confirmation Number] This is your electric service confirmation number \_\_\_\_\_. Now that I have completed your electric service order, I'd like to transfer you and your order information to our partner Allconnect, a company that can assist you with the transfer or setup of home services, such as TV and Internet. May I transfer you and your order information to Allconnect at this time?

If customer's answer is "yes", the call is transferred.  
If customer's answer is "no": the call is concluded.

6. Just as the Staff stated in its May 20, 2016, filing that the May 10, 2016, proposed script of KCP&L/GMO is not consistent with the Commission's April 27, 2016, *Report and Order* in this File and should not be accepted by the Commission, KCP&L/GMO's May 23, 2016, proposed script is not consistent with the Commission's April 27, 2016, *Report and Order* in this File and should not be accepted by the Commission. Whatever the Commission decides regarding the content of the KCP&L/GMO script, the Staff intends to monitor KCP&L/GMO's compliance with the Commission's April 27, 2016, *Report and Order* and any subsequent Orders of the Commission in this File or related Files, including scripts and on occasion recordings of actual phone calls between customers and KCP&L/GMO customer service representatives and customers and Allconnect representatives.

**WHEREFORE**, the Staff respectfully requests that the Commission not approve the three proposed script language adjustments submitted by KCP&L/GMO on May 23, 2016, addressed by the Staff above and in the Staff's May 20, 2016, filing with the Commission, and in their stead approve the script language proposed by the Staff above and addressed in this filing and in the Staff's May 20, 2016 filing with the Commission.

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 *Staff Response To May 23, 2016 Filing Of KCP&L/GMO* was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 24<sup>th</sup> day of May, 2016, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

**/s/ Kevin Thompson**