

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

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

**STAFF REPLY TO MAY 10, 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 10, 2016 filing of Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") and the May 11, 2016 *Order Establishing Time to Respond to Revised Script for Calls to be Transferred to Allconnect* of the Missouri Public Service Commission ("Commission").

The Staff maintains that the filing of KCP&L and GMO is not consistent with the Commission's April 27, 2016 *Report and Order* in this File, regarding an appropriate script which is the subject matter of KCP&L/GMO's May 10, 2016, filing. In support thereof, the Staff states as follows:

1. 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.)

Thus, the KCP&L/GMO customer service representatives must verify the customers' information and provide to the KCP&L/GMO customers their confirmation number. KCP&L/GMO cannot use Allconnect to verify customer information and provide to the customer his/her confirmation number, otherwise customers are not able to complete their business with KCP&L or GMO without having to transfer to Allconnect. The Commission's *Report and Order* is clear that KCP&L/GMO cannot continue to "mask the true nature of the transaction" by leading on its customers to believe that they must remain on the line to be transferred to and talk with Allconnect in order to get their information verified and obtain their confirmation number for the connection of electric service.¹

¹ The Commission's April 27, 2016, *Report and Order* states, in part, at page19:

. . . the transfer of customer information to Allconnect does not serve any utility-service related purpose. . . .

KCP&L and GMO attempt to mask the true nature of the transaction by having Allconnect "confirm" the accuracy of the customer information already taken by KCP&L and GMO's

2. In its filing on Tuesday, May 10, 2016, KCP&L/GMO proposed the revised KCP&L/GMO customer service representative script below. The Staff proposes the following redlined changes to the KCP&L/GMO proposal. The Staff recommends these changes because the KCP&L/GMO proposal is not consistent with the Commission's April 27, 2016 *Report and Order* that KCP&L/GMO customers should be able to complete their business with KCP&L or GMO without having to transfer to Allconnect. KCP&L/GMO's May 10, 2016 filing does not state the KCP&L/GMO customer service representative will verify the customer information and provide to the customer his/her confirmation number. The KCP&L/GMO proposed script clearly indicates that the customer needs to stay on the line to obtain from the Allconnect representative confirmation of his/her electric service order for accuracy. The Staff's proposed script is worded so that the customer is able to complete his/her business with KCP&L or GMO without having to transfer to Allconnect:

KCP&L/GMO Proposal:

Mr. / Ms. ____ Now that I have completed your order, I'd like to transfer you and your order information to our partner Allconnect, a company that can confirm your electric service order for accuracy and assist you with the transfer or setup of your other home services, such as TV and internet. May I transfer you at this time?

customer service representatives. . . the confirmation function performed by Allconnect is a pretext to attempt to avoid regulatory problems of the type presented by Staff's complaint. Indeed, the confirmation function serves as a marketing hook to discourage utility customers from dropping off the line when their call is transferred to Allconnect.

Staff Proposal:

Mr. / Ms. . . . [Verify Customer Information] This is your electric service confirmation number .² 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 electric service order for accuracy and assist you with the transfer or setup of your other 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":

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

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3. The KCP&L/GMO's proposed revised script does not meet the criteria set out in the Commission's April 27, 2016 *Report and Order*, but the Staff's proposed revised script does, as shown in redlining in the table below, which table is borrowed in part from KCP&L/GMO's May 10, 2016 filing:

<u>KCP&L/GMO Customer Service Representative Script Element</u>	<u>Criteria it which the KCP&L/GMO Customer Service Representative Script Element meets</u>
<u>[Verify customer information] This is your electric service confirmation number . Now that I have completed your order, I'd like to...</u>	<u>They customers can complete their necessary business with KCP&L or GMO without having to transfer to Allconnect.</u>

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² The Commission states, in part, in paragraph 12, page 6 of its April 27, 2016, *Report and Order* that the customer information provided to Allconnect by the KCP&L/GMO customer service representatives is the confirmation number, customer's name, service address, start-date of service, and account number.

<p>...I'd like to transfer you and your order information to our partner Allconnect, a company that can confirm your electric service order for accuracy and assist you with the transfer or setup of your other home services, such as TV and internet.</p>	<p>Allconnect is a separate company and a KCP&L/GMO partner that offers services separate and apart from the electric service offered by the utility. Allconnect can assist with the transfer or setup of home services not provided by KCP&L/GMO.</p>	<p>Formatted: Font: (Default) Arial, 10 pt</p> <p>Formatted: Font: (Default) Arial, 10 pt</p> <p>Formatted: Font: (Default) Arial, 10 pt</p>
<p>May I transfer you <u>and your order information to Allconnect</u> at this time?</p> <p>If customer's answer is "yes," the call is transferred. If customer's answer is "no," :</p> <p>Mr. / Ms. , your call is complete. Thank you for calling <u>KCP&L or GMO.</u></p>	<p>TheyKCP&L/GMO must ensure that customers understand that they have the option to transfer to Allconnect but they can complete their necessary business with KCP&L or GMO without having to transfer to Allconnect.</p>	<p>Formatted: Font: (Default) Arial, 10 pt</p> <p>Formatted: Font: (Default) Arial, 10 pt</p> <p>Formatted: Font: (Default) Arial, 10 pt</p> <p>Formatted: Font: (Default) Arial, 10 pt</p> <p>Formatted: Font: (Default) Arial, 10 pt</p> <p>Formatted: Font: Italic</p> <p>Formatted: Font: Italic</p> <p>Formatted: Font: Italic</p> <p>Formatted: Font: (Default) Arial, 10 pt, Italic</p>

4. The Commission states, in part, at page 21 of its April 27, 2016 *Report and Order*, last sentence of the last full paragraph, that "the Commission will prescribe the changes KCP&L and GMO must make to bring the Allconnect relationship into compliance with the Commission's rule, as it is authorized to do by Section 393.140(5), RSMo 2000." The Staff cited Sections 393.270.2 and 393.140(2) at page 7, paragraph 12 in its Complaint filed May 20, 2015, that the Commission shall examine or investigate the methods employed by electrical corporations, and the Commission has power, within lawful limits after such investigation and a hearing, to order such adequate, just and reasonable improvements in the manufacture, transmission, or supply of electricity, or the methods employed by such persons or corporation, as will in the Commission's judgment best promote the public interest, preserve the public health, and protect those using electricity.³

³ Sections 393.270.2 and 393.140(2) also are cited by the Staff in Report Of Staff's Investigation Of Allconnect Direct Transfer Service Agreement Between Allconnect, Inc. And Great Plains Energy

5. KCP&L/GMO indicated in their filing on May 10, 2016, that they shared their revised script with representatives of the Staff prior to filing their pleading and remain interested in the Staff's feedback. The Staff was not able to provide KCP&L/GMO any alternative language prior to KCP&L/GMO's May 10, 2016 filing, but did indicate that the Staff did not believe KCP&L/GMO's proposed language is consistent with the Commission's April 27, 2016, *Report and Order*.

WHEREFORE, the Staff respectfully requests that the Commission not approve the proposed script language submitted by KCP&L/GMO on May 10, 2016 and in its stead approve the script language proposed by the Staff in the instant filing.

Respectfully submitted,

/s/ Kevin A. Thompson

Kevin A. Thompson
Chief Staff Counsel
Missouri Bar No. 36288
(573) 751-6514 (Telephone)
(573) 526-6969 (Fax)
kevin.thompson@psc.mo.gov (e-mail)

Steven Dottheim
Chief Deputy Staff Counsel
Missouri Bar No. 29149
(573) 751-7489 (Telephone)
(573) 751-9285 (Fax)
steve.dottheim@psc.mo.gov (e-mail)

Attorneys for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102-0360

Services Incorporated Respecting Itself And Its Affiliates Kansas City Power & Light Company And KCP&L Greater Missouri Operations Company (first filed in File No. EO-2014-0306), which is Appendix 1 to the Staff's Complaint in File No. EC-2015-0309.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Staff Reply To May 10, 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 20th 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