

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

In the Matter of The Empire District Electric Company's)
Request for Authority to File Tariffs Increasing Rates for Electric) Case No. ER-2019-0374
Service Provided to Customers in its Missouri Service Area)

NOTICE REGARDING CUSTOMER SERVICE AND BILLING MATTERS

COMES NOW The Empire District Electric Company (“Empire” or “Company”), and for its Notice Regarding Customer Service and Billing Matters, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On July 23, 2020, the Commission issued an *Amended Report and Order* in the above-captioned matter, effective August 2, 2020.

2. On page 145 of the *Amended Report and Order*, the Commission stated that “(w)hile the Commission finds that Empire is taking steps to improve its customer service, the Commission believes it is important to monitor Empire’s progress related to meter reading and billing.” The Commission then directed Empire, as originally agreed to by Empire as part of the non-unanimous stipulation and agreement filed in this case, to undertake ten tasks for the years 2020, 2021, and 2022 related to meter reading and billing.

3. Additionally, on page 146 of the *Amended Report and Order*, the Commission directed Empire to file notice in this case by September 1, 2020, “containing an explanation of the actions the Company has taken to implement” the recommendations related to meter reading and billing.

4. Set forth below are the ten tasks/recommendations and an explanation of the actions taken thus far by the Company to implement the recommendations and the steps the Company intends to take to further improve the Company’s customer service and billing practices.

(1) Incorporate Data Into Monthly Reports to Commission Staff

Empire will incorporate the data requested in items two through five below into the Company's monthly reports which are provided to the Commission's Staff. The first monthly report with this data incorporated will be submitted in October 2020, utilizing September 2020 data.

(2) Initiate Quarterly Reports to Staff and OPC - Estimated Meter Readings

The Company will build upon the monthly reports that are provided to Staff and begin providing quarterly reports to Staff and OPC. The number of estimated meter readings will be included in these quarterly reports to be provided to Staff and OPC, as well as in the monthly reports provided to Staff. The Company's draft report template is attached to this Notice as Attachment A. The first quarterly report will be provided to Staff and OPC in October of 2020, utilizing data from the 3rd quarter of 2020.

(3) Quarterly Reports - Estimated Readings Exceeding Three Consecutive Estimates

The number of estimated meter readings exceeding three consecutive estimates will be included in the quarterly reports to be provided to Staff and OPC, as well as in the monthly reports provided to Staff. As noted above, the Company's draft report template is attached to this Notice as Attachment A, and the first quarterly report will be provided to Staff and OPC in October of 2020, utilizing data from the 3rd quarter of 2020.

(4) Quarterly Reports - Bills with a Billing Period Outside of 26 to 35 Days

The number of bills with a billing period outside of 26 to 35 days will be included in the quarterly reports to be provided to Staff and OPC, as well as in the monthly reports provided to Staff. As noted above, the Company's draft report template is attached to this Notice as

Attachment A, and the first quarterly report will be provided to Staff and OPC in October of 2020, utilizing data from the 3rd quarter of 2020.

(5) Quarterly Reports - Company and Contract Meter Reader Staffing Levels

Company and contract meter reading staffing levels will be included in the quarterly reports to be provided to Staff and OPC, as well as in the monthly reports provided to Staff. As noted above, the Company's draft report template is attached to this Notice as Attachment A, and the first quarterly report will be provided to Staff and OPC in October of 2020, utilizing data from the 3rd quarter of 2020.

(6) Evaluate Authorized Meter Reader Staffing Level and Take Action to Maintain Adequate Meter Reader Staffing Levels in Order to Minimize the Number of Estimated Bills

Empire currently offers unlimited overtime to Company meter readers in order to stay on schedule. Overtime has also been extended to the contractor and is mandated when necessary. The Company's meter reading contractor has hired an additional person to ensure contracted meter readers stay on schedule, and this additional hire coordinates with the Company as appropriate. Empire approved additional contract meter readers in order to continue reducing the number of estimated reads. Further, employees from multiple departments are being utilized to read meters in order to stay on schedule. As Empire implements AMI across the service territory, the Company plans to maintain the authorized staffing level through the transition to ensure estimated reads and other issues will be effectively and efficiently addressed.

(7) Meet with Staff and OPC to Discuss Bill Redesign Possibilities

Representatives from Empire, Staff, and OPC met to discuss bill redesign possibilities for the future on August 25, 2020. As a result of the feedback Empire received from Staff and OPC, the Company is evaluating its current bill design for both short-term and long-term solutions to increase customer awareness of bill estimations and payment options. Further, Empire is

currently in the process of developing and implementing long-term digital and print solutions to increase customer communication and transparency regarding customer billing and electric usage. Empire plans to proactively communicate with Staff and OPC regarding its short-term and long-term initiatives to improve its customer interaction and satisfaction.

Empire is evaluating its customer bill format against industry standards, implementing improved digital account interaction tools, and investing in AMI infrastructure to continue improving the customer experience. Empire plans to continue communications with stakeholders as we develop and implement these improvements.

At this time, Empire intends to implement a message on the front (first) page of the customer bill that clearly communicates that the customer's usage has been estimated, with the customer being instructed to refer to the second page of the bill for detailed information. The Company is working toward having this message appear on bills after September 30, 2020, in order to allow adequate time for development, testing, and implementation. Additionally, Empire plans to implement a message in the "Account Package" section of the bill, also on the front (first) page, indicating that usage has been estimated. Because this change will require additional development and testing, the Company is working to have this change implemented by the start of the new year.

(8) Ensure All Customers Who Receive Estimated Bills for Three Consecutive Months Receive Appropriate Communication Regarding Estimated Bills and Option to Report Usage – Service and Billing Practices Rule 20 CSR 4240-13.020(3)

To ensure that all customers who receive estimated bills for three consecutive months receive the appropriate communication pursuant to Rule 20 CSR 4240-13.020(3), Empire is producing and working a daily report to identify customers in this category. The identified customers receive a letter, attached to this Notice as Attachment B, in compliance with the

Commission's Service and Billing Practices Rule. Additionally, Customer Service Representatives ("CSRs") review the report to determine the underlying reason that a meter was not read. CSRs then create work orders and/or contact the appropriate department to ensure the underlying issue is corrected.

(9) Ensure All Customers Who Receive an Adjusted Bill Due to Underestimated Usage are Offered the Appropriate Amount of Time to Pay the Amount Due – Service and Billing Practices Rule 20 CSR 4240-13.025(1)(C)

Customers that receive an adjusted bill due to underestimated usage will always be offered the appropriate amount of time to pay the amount due as required by Commission Rule 20 CSR 4240-13.025(1)(C). Additionally, Empire is evaluating its billing system to create additional communication for customers with adjusted billed usage to ensure customers have multiple channels to understand their payment options.

(10) Evaluate Meter-Reading Practices and Take Action to Ensure Billing Periods Stay Within the Required 26 to 35 Days, Unless Permitted by Rule Exceptions

The Company is taking steps to ensure that billing periods stay in compliance with the Commission's Rules. Company management is monitoring the meter reading schedules more closely for routes that could fall outside the permitted read window, and each meter reader has a schedule tool that keeps them on track. If a route is read before 26 days, that route is read again by the reader within the appropriate window. In order to reduce estimates, readers are shifted to routes which are at risk of missing the permitted read window. Cross-trained employees from other departments are also utilized as needed to read meters in order to stay on schedule and within the read window. Additionally, to ensure that billing periods stay within the timeframe specified by the Commission's Rules, Empire is producing and working a daily report on billing periods.

WHEREFORE, Empire submits its Notice Regarding Customer Service and Billing Matters. No action on the part of the Commission is requested with this filing.

Respectfully submitted,

/s/ Diana C. Carter
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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 1st day of September, 2020, with notification of the same being sent to all counsel of record.

/s/ Diana C. Carter



ER-2019-0374 Order Quarterly Compliance Report
Summary

Billing Metrics- Liberty-Empire 2020

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YTD
Monthly Estimates													
MO													
Billing Days under 26 over 35													
Fixed > 35 Days													
New Customer < 26													
Meter Reader Staffing- Liberty/Contractors													
Approved Liberty Meter Reader Staff*													
Actual Liberty Meter Reader Staff*													
Approved Contractor Meter Reader Staff*													
Actual Contractor Meter Reader Staff*													
3 or more Estimations													
MO													

* As of the first of the month

Liberty Utilities Empire District
602 S JOPLIN AVE
JOPLIN, MO 64802

date

name

address

address

Account No.: **

Dear *,

Our meter reader has been unable to read your electric meter for three (3) months, therefore, your electric bills have been estimated and do not reflect actual usage.

The State of Missouri requires us to obtain actual meter readings in the event a meter has been estimated for three consecutive months. Although our estimating process is usually close, continuous estimating can cause fluctuations in billing. We would be happy to set up a payment agreement for 2 times the number of months that your account was estimated if you so desire.

Enclosed is a pre-addressed, postage-paid card. If you have a mechanical meter, please mark the position of the hands on the dials exactly as they appear on your meter. If you have a digital meter, please write the read in the blank spaces. If you are unable to read the meter, please contact Liberty Utilities to schedule an appointment.

Thank you for your help obtaining an accurate read. If you have any questions, please contact us by phone at 1-800-206-2300 or by email at customer.service@libertyutilities.com.

Sincerely,

Liberty Utilities

Enclosure
(Initials)

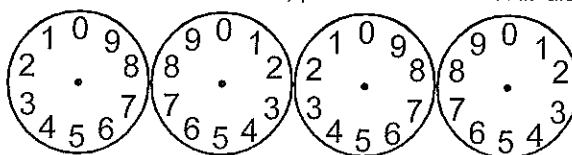
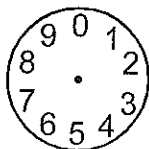
Name _____ Date _____

Address _____

Account or Meter No. _____

For Mechanical Meters - Mark the position of the hands on the dials below exactly as they appear on your meter.

If you have a four-dial meter, please use these four dials.



For Digital Meters - Reading: _____

Please read your meter on day _____ of each month, and mail this card to our office. If the card is not received, it will be necessary to estimate the bill.

CA 9 03-20



Liberty Utilities



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 20 JOPLIN MO

POSTAGE WILL BE PAID BY ADDRESSEE



ATTN. BILLING OPERATIONS
LIBERTY UTILITIES
PO BOX 127
JOPLIN MO 64802-9932

