

*Exhibit No.:*  
*Issues:* *Alternative Regulation*  
*Plan:* *Quality of Service*  
*Witness:* *Deborah Ann Bernsen*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Surrebuttal Testimony*  
*Case No.:* *EC-2002-1*  
*Date Testimony Prepared:* *June 24, 2002*

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY SERVICES DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**DEBORAH ANN BERNSEN**

**UNION ELECTRIC COMPANY  
d/b/a AMERENUE**

**CASE NO. EC-2002-1**

Jefferson City, Missouri  
June 2002

**NP**

**\*\* Denotes Proprietary Information \*\***

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

The Staff of the Missouri Public Service Commission,

Case No. EC-2002-1

Complainant,

vs.

Union Electric Company, d/b/a AmerenUE,

Respondent.

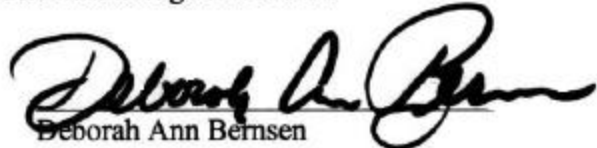
**AFFIDAVIT OF DEBORAH ANN BERNSEN**

STATE OF MISSOURI

ss.

COUNTY OF COLE

Deborah Ann Bernsen, is, of lawful age, and on her oath states: that she has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 19 pages to be presented in the above case; that the answers in the following Surrebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.

  
Deborah Ann Bernsen

Subscribed and sworn to before me this 24<sup>th</sup> day of June, 2002.



  
Notary Public

TONI M. CHARLTON  
NOTARY PUBLIC STATE OF MISSOURI  
COUNTY OF COLE  
My Commission Expires December 28, 2004

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**UNION ELECTRIC COMPANY**  
**d/b/a AMERENUE**  
**CASE NO. EC-2002-1**

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1 I entered the Management Services Department in 1978 as a Management Analyst and  
2 since that time have had responsibility for conducting and directing reviews of  
3 management operating and control systems at utility companies under the Commission's  
4 jurisdiction. I was the Staff's representative and a member of the Consumer Interest  
5 Working Group within the Missouri Public Service Commission's Retail Electric  
6 Competition Task Force in 1999. The name of the Management Services Department  
7 was changed to the Engineering and Management Services Department (EMS) in  
8 February 2000.

9 Q. What is the purpose of your testimony?

10 A. The purpose of my testimony is to discuss the assertions of Union Electric  
11 Company, d/b/a AmerenUE (Company) regarding excellent service, to identify several  
12 deficiencies with the Company's proposed alternative regulation plan, and recommend  
13 that the Company initiate reporting to the PSC on customer service indicators if the  
14 Commission decides to accept any form of a further alternative regulation experiment as  
15 a result of this case.

16 **CUSTOMER SERVICE LEVELS**

17 Q. Has the Company made assertions of excellent customer service?

18 A. The Company has repeatedly made assertions regarding the high level of  
19 service it believes it is providing its customers and the level of customer satisfaction.  
20 These assertions appear in the rebuttal testimony of several Company witnesses,  
21 specifically Gary L Rainwater, Warner L. Baxter and Thomas R. Voss.

22 Q. Are the Company's assertions accurate?

1           A.     No. While the Staff is not making assertions that the Company provides  
2 inadequate customer service, the indicators used by the Company are not definitive  
3 indicators of outstanding customer service.

4           Q.     What does the Company use to illustrate its assertion of outstanding  
5 customer service?

6           A.     In its testimony, the Company points to the 2001 report by the University  
7 of Michigan Business School detailing the results of the American Customer Satisfaction  
8 Index (ACSI) data. The ACSI is an indicator that measures customer satisfaction with  
9 the quality of goods and services that are purchased in the United States. The scores are  
10 based upon data collected from telephone interviews. ACSI scores are segregated by  
11 industry. Baseline information is included wherever possible to incorporate results from  
12 1994 going forward. To further explain the index, I have provided the following quote  
13 from the ACSI website which is located at [www.theacsi.org](http://www.theacsi.org):

14                   Established in 1994, the American Customer Satisfaction Index  
15 (ACSI) is a uniform and independent measure of household  
16 consumption experience. A powerful economic indicator, the  
17 ACSI tracks trends in customer satisfaction and provides valuable  
18 benchmarking insights of the consumer economy for companies,  
19 industry trade associations, and government agencies. The ACSI  
20 is produced through a partnership of the University of Michigan  
21 Business School, the American Society for Quality (ASQ), and the  
22 international consulting firm, CFI Group. ForeSee Results  
23 sponsors the e-commerce measurement and Market Strategies, Inc.  
24 is a major corporate sponsor of the ACSI. The ACSI is funded in  
25 part by corporate subscribers who receive industry benchmarking  
26 data and company-specific information about financial returns  
27 from improving customer satisfaction.

28 I have attached a copy of the survey rankings for the year 2001 as Schedule 1. The third  
29 page of the schedule shows the category of gas and electric service providers and  
30 includes the listing for “Ameren Corporation.”

1           Q.     Does the Staff believe that the ACSI is a useful indicator of the level of  
2 customer service that the Company is providing?

3           A.     Yes, the ACSI can provide one useful indication of any trend in the level  
4 of the customer service that the Company is providing. The Staff does question the  
5 validity of any comparative ranking of companies based upon their ACSI score.

6           Q.     Why does the Staff believe that this ranking does not represent the best  
7 indicator of customer service?

8           A.     It is difficult to conduct true comparative analysis among companies.  
9 There are so many variables affecting the Company's operating environment that such  
10 comparisons are of limited value. Such variables can include, for example,  
11 demographics, customer mix and power supply. These differences make it difficult to  
12 select true comparators when attempting to make conclusions on the basis of performance  
13 indicators. One runs the risk of comparing apples to oranges, making the conclusions  
14 drawn from the exercise, of very little value. Dr. Dennis Weisman on page 13 of his  
15 rebuttal testimony for the Company also refers to and admits the difficulty associated  
16 with such undertakings.

17                   The basic idea is to create a "yardstick" by which the regulator can  
18 evaluate the relative performance of the utility even though the  
19 utility may not face actual competition. While this is inherently a  
20 very difficult undertaking and can often not be achieved with  
21 precision, the key point is that the utility's performance is  
22 measured and rewarded or penalized based on a comparison with  
23 other utilities that provide service under comparable conditions.

24           Q.     Is there a better indicator of the Company's performance than the  
25 comparative rankings?

26           A.     The Company's own performance measured against itself over time  
27 provides a better assessment of whether present levels of service have deteriorated or

1 improved. The ACSI website notes the usefulness of the information to provide trend  
2 data and valuable benchmarks.

3 Q. Did the Staff make any attempt to evaluate the list of companies included  
4 in the ACSI for their comparability?

5 A. The Staff did a preliminary review of the companies that were included  
6 with Ameren in the year 2001 ACSI within the category of providers of gas and electric  
7 service. For each of these companies, the Staff attempted to determine the states where  
8 they were providing electric and gas distribution services. Staff then selected the  
9 following two variables to apply to the list of companies: 1) whether these states had  
10 retail electric competition and/or 2) whether these states had alternative regulation  
11 programs in place.

12 The Staff's review showed wide variations in both criteria for  
13 the 14 companies that were included in the 2001 rankings. The results of this analysis are  
14 contained in Schedule 2. Fundamental differences among these companies will reduce  
15 the validity of any comparative ranking with Ameren Corporation (Ameren).

16 Q. Are there other problems associated with the use of the 2001 ACSI data to  
17 support the Company's assertion of excellent customer service?

18 A. Ameren participated in the ACSI survey for the first time in the year 2001.  
19 This is the information that is the sole basis for its assertions of outstanding service.  
20 Current data through the end of the first quarter of 2002 shows a decline in Ameren's  
21 ranking from year 2001 to the first quarter of 2002. Schedule 3 is a copy of the first  
22 quarter results from 2002. The Company's score declined from 78 to 76 and dropped it  
23 from its prior position of third to fourth. There were eighteen companies ranked and



1 Ameren was the only company in the top ten of the rankings that suffered a reduction in  
2 its index.

3 Q. Does Mr. Voss's Schedule 4 show that the prior program, the  
4 Experimental Alternative Regulation Plan, (EARP) effected a greater rate of  
5 improvement in customer service than that which occurred without the EARP?

6 A. No. This schedule actually shows that the rate of improvement in  
7 favorable responses from consumers was reduced during EARP. The Company's  
8 performance was fairly flat over the period of 1996 to 2000.

9 Q. Are there other sources of information regarding the levels of customer  
10 satisfaction in addition to Mr. Voss's testimony?

11 A. Yes. Attached as Schedule 4 is a portion of the material provided in  
12 response to OPC Data Request No. 669. This schedule was classified as proprietary by  
13 Ameren. I believe this material provides a more accurate representation of how Ameren  
14 actually views its level of customer satisfaction.

15 Q. What specifically does Schedule 4 show?

16 A. Schedule 4 contains \*\* P

17 P

18 P

19 P

20 P

21 P

22 P

1 P

2 P

3 P

4 P

5 P

6 P

7 P

8 P

9 P \*\*

10 Q. Does Staff have an opinion regarding the quality of customer service that  
11 Ameren provides to its customers?

12 A. Yes. Union Electric is providing safe and adequate service. This service  
13 can be improved at this Company as it can at any company. The Staff did complete a  
14 review of the Company's primary customer service functions in May of 1999. The final  
15 report included 28 recommendations which identified potential areas for improvements at  
16 the Company. The Company responded to the audit report in August of 1999 with an  
17 Audit Recommendation Implementation Plan. This Implementation Plan provided the  
18 Company's responses to the audit and delineated the actions that the Company intended  
19 to take to address the recommendations. Since that time, the Staff has performed a  
20 preliminary review of the Company's actions and intends to conduct a detailed review  
21 and produce a formal report in the summer of 2003. This review will provide the Staff  
22 with information on the Company's actions to address potential improvements, allow the  
23 Staff to witness operating procedures and also include a review of present levels of  
24 service.

1 Q. Was the Staff's audit of customer service functions in any way tied to the  
2 Company's participation in an alternative regulation plan?

3 A. No. The audit was initiated as a part of the Staff's ongoing program of  
4 conducting reviews of the customer service functions at utilities regulated by the  
5 Commission, regardless of whether the utility operates under traditional regulation or an  
6 alternative form of regulation.

7 Q. Is it possible that some of the customer service improvements that have  
8 occurred over the last three years are attributable to recommendations made by the Staff's  
9 audit?

10 A. Yes. The Staff's audit report made 28 recommendations for improvement  
11 potentials in the area of customer service that are independent of the EARP. It is not  
12 likely that all of the improvements that the Company asserts it has implemented are due  
13 to the existence of an EARP.

14 **DEFICIENCIES WITH ALTERNATIVE REGULATION PLAN**

15 Q. Do you have any comments regarding the structure of the alternative  
16 regulation plan as submitted by the Company in its rebuttal testimony?

17 A. Yes. I do have a few comments to make regarding the design of the  
18 alternative regulation plan from the viewpoint of a management analyst. My evaluation  
19 focused upon the components of the Company's proposal as a properly structured  
20 alternative regulation plan. My comments concentrate on what I believe are deficiencies  
21 in the following two areas:

22 ?? The lack of a response mechanism to declining performance; and

23 ?? The lack of any stated objectives.

1           Q.     Is the exclusion of a response mechanism within the alternative regulation  
2 plan a deficiency?

3           A.     Yes. I would suggest that the alternative regulation plan be modified to  
4 incorporate a default provision to address situations where the Company is unable to  
5 meet its service objectives. The focus of the proposed alternative regulation plan seems  
6 to be based on the achievement of a return on equity (ROE) and the monies that will be  
7 given to customers when the Company achieves various returns. The alternative  
8 regulation plan does not address the issue of what occurs if there is a deterioration of  
9 customer service in order to achieve an ROE level. In effect, the Company is given the  
10 opportunity to earn higher returns but has no risk if customer service suffers. While it  
11 may appear that there is an “incentive” to perform better financially, there is no  
12 disincentive to achieve these financial results as a consequence of decreased customer  
13 service. A default provision would help ensure that financial results are not achieved at  
14 the expense of customer service levels.

15          Q.     How would you suggest that a default provision be developed and  
16 applied?

17          A.     The actual structure of a default provision would be dependent upon the  
18 structure of the alternative regulation plan. One method may be to develop current  
19 objectives for service based upon historical levels and present technology. These  
20 objectives should encompass a range of functions to ensure that overall customer service  
21 does not suffer in order to show an improvement in certain customer service areas. If the  
22 Company’s performance does not meet its service objective, an adjustment would be  
23 made to the sharing grid to retain an amount of earnings that would have gone to the

1 Company as a result of an alternative regulation plan. The Company's share of the  
2 earnings would be retained subject to the recommendations of the parties and /or order of  
3 the Commission respecting the Company not having met a service objective. I address a  
4 specific reporting of information and associated responses later in this testimony.

5 Q. You have also cited the lack of defined objectives for the proposed  
6 alternative regulation plan. Why is this a deficiency?

7 A. Without stated objectives and expectations and the associated methods of  
8 tracking the actual performance of the alternative regulation plan, the Company, as well  
9 as the Staff, would be unable to actually measure the success of the plan. At this stage,  
10 no one knows what the alternative regulation plan is designed to accomplish other than to  
11 avoid a large rate reduction. The Company has not included any proposals on methods of  
12 assessing the effectiveness of the alternative regulation plan, and without these, it will not  
13 be possible to determine specifically what the alternative regulation plan actually  
14 accomplished. A similar lack of comprehensive objectives was identified as a deficiency  
15 in the previous plans, the Experimental Alternative Regulation Plans (EARPs). While the  
16 proposed plan includes the reporting of information on service levels at the call center  
17 and distribution reliability standards, it still does not offer any specified objectives for  
18 determining the performance of the alternative regulation plan in other areas.

19 The issue raised by the Staff in the past regarding customer benefits is still  
20 valid. The fundamental measure of success will be whether Missouri electric customers  
21 receive benefits under an alternative regulation plan that they would not have had  
22 available to them under traditional regulation. The failure to address this issue will

1 greatly increase the probability that the parties will be in a similar proceeding at the  
2 expiration of any new alternative regulation plan.

3 **SERVICE INDICATORS REPORTING**

4 Q. Has the Company suggested service quality indicators as a part of its  
5 proposed alternative regulation plan?

6 A. Yes, these indicators and their reporting are discussed in the rebuttal  
7 testimony of Warner L. Baxter. The details of the monitoring reports that the Company  
8 is proposing are contained on page 15 of Schedule 1 to Mr. Baxter's rebutted testimony.  
9 These monitoring reports include information on call center service quality and  
10 distribution system reliability.

11 Q. What is the Staff proposing in this case regarding the provision and  
12 reporting of service indicator information?

13 A. The Staff believes that such indicators and their reporting is essential to  
14 any alternative regulation plan. As a consequence, Staff is recommending that the  
15 Company be required to provide the service indicator information to the Commission  
16 Staff on a regular basis, if the Commission decides to allow the Company to operate  
17 under any alternative regulation plan.

18 Q. Can the use of service indicators provide complete assurance that  
19 customers are receiving a high level of service?

20 A. No. While the use of indicators can provide a useful management tool and  
21 can be used to help direct further inquiry, an indicator cannot provide assurance that  
22 deficiencies are not present in other facets of customer service. The Staff maintains that  
23 indicators do provide a useful tool to monitor changes and trends in specific areas. These

1 trends alert the Company, Staff and other parties to deviations from expected or required  
2 levels of customer service as well as potential problems in the Company's operation.

3 Q. Should objectives be set for specific indicators?

4 A. Yes. The Commission should direct the Company to develop and adopt  
5 objectives for each of the indicators being monitored. These objectives should be set  
6 based upon historical performance and present technology and should represent  
7 meaningful yet challenging objectives. The parties to this proceeding should agree to  
8 these objectives. If the parties are unable to reach an agreement on the level of objectives  
9 to be utilized, the Commission would be required to consider the proposed alternatives  
10 and select the objectives to be used within the performance monitoring. Objectives  
11 should be reviewed on a yearly basis to determine their ongoing appropriateness.

12 Q. What is the Staff recommending for a reporting mechanism for these  
13 indicators?

14 A. The Staff recommends that the Commission require the Company to  
15 provide actual monthly performance information regarding its customer service  
16 indicators. My focus in this surrebuttal testimony is upon the Company's call center  
17 performance. Staff witness James L. Ketter of the Commission's Energy Department  
18 addresses the issue of distribution system reliability in his surrebuttal testimony. Staff  
19 witness Michael Proctor also sets out in his surrebuttal testimony important requirements  
20 for an alternative regulation plan and he includes a discussion of other performance  
21 indicators.

22 It is important to note that the Company presently maintains information  
23 on all of the indicators noted here. These indicators are the same as those suggested by

1 Mr. Baxter and presented in his Schedule 1. At a minimum, the information that should  
2 be reported includes the following:

3 ?? Call Center Abandoned Call Rate (ACR), including call volumes

4 ?? Call Center Average Speed of Answer (ASA)

5 ?? Distribution Reliability Customer Average Interruption Duration Index (CAIDI)

6 ?? Distribution Reliability System Average Interruption Frequency Index (SAIFI)

7 ?? Distribution Reliability System Average Interruption Duration Index (SAIDI)

8 Staff recommends that the Company file this information in an electronic  
9 format within 30 days of the end of each month. Additionally, Staff recommends the  
10 Company file within 45 days after the end of each 12-month period, a report with the  
11 Commission that includes actual performance on these indicators for the year,  
12 explanation of any significant deviations from prior performance by the present  
13 indicators, anticipated actions to be undertaken to improve performance, estimated costs  
14 to complete these actions and the estimated dates of completion. In addition to these  
15 formal procedures, it is recommended that the Staff and Company meet informally to  
16 discuss significant changes in either the performance of or the measurement technique for  
17 these indicators whenever such occur.

18 Q. What do the indicators previously listed measure?

19 A. Staff witness Ketter addresses in his surrebuttal testimony the distribution  
20 reliability indicators, and I address the indicators that relate to the call center's  
21 performance.

22 The Abandoned Call Rate (ACR) is the percentage of telephone calls that  
23 are terminated by the customer after the call has been answered and placed in the network



1 queue. Typically, a call is abandoned because the wait time for it to be responded to  
2 becomes excessive in the customer's mind and the customer terminates the call. These  
3 are counted as abandoned calls and are calculated against calls received to derive a  
4 percentage of calls abandoned.

5 The Average Speed of Answer (ASA) is the number of seconds that the  
6 caller waits before the call is answered by an employee who will process the call.

7 The prior descriptions are somewhat generic to all call center  
8 measurement systems. However, the Staff has found subtle differences in how some  
9 companies calculate these indicators. The Company will need to supply a detailed  
10 description of how it computes these indicators to assure the understanding of these  
11 measurements.

12 Q. What does the Staff recommend if the Company's filed report indicates  
13 that it has not met its service objectives?

14 A. The Staff recommends that there should be a response mechanism in the  
15 event that the Company does not meet the service objectives that have been set. The  
16 Staff believes there should be a mechanism that would initially place the Company's  
17 share of earnings, based on the sharing grid, into a retention account. Based upon the  
18 issues identified in the Company's reports associated with the decline in service, the  
19 parties may agree that the retained funds should be released for Company use. However,  
20 if the deterioration in service is seen as having been due to Company actions or inactions,  
21 the parties might recommend for the Commission's decision that a portion of the funds be  
22 credited to customers and the remainder be directed at efforts to improve the Company's  
23 performance. This procedure serves to compensate the customer for receiving less than

1 targeted service and provides an incentive with the retention of funds to take and  
2 successfully complete actions designed to improve the actual service level.

3           The appropriate amount of funds to be credited to customers should be  
4 based upon a number of factors such as the amount of the variance from the objective, the  
5 number of objectives that have not been met, and the estimated amount that may be  
6 required to conduct actions designed to improve the service levels to attain the objective.  
7 If the Company and the parties cannot agree on the amounts, necessary remedial action,  
8 timing of achieving improvements, etc., recommendations would be filed with the  
9 Commission for its decision on these issues.

10           Q.    What other criteria may need to be specified within this response  
11 mechanism?

12           A.    Staff recommends that the response mechanism clearly specifies that there  
13 should be no changes in the measurement techniques. Service should not be  
14 compromised to artificially enhance the indicators.

15           Q.    Would verification of the information supplied by the Company on service  
16 levels be conducted?

17           A.    Yes. The Staff would conduct a verification of the Company's assertions  
18 regarding service levels within the context of the annual audit report that the Staff would  
19 file to report on the Company's financial information relating to the alternative regulation  
20 program. Thus an audit of Company service level performance would be performed in  
21 conjunction with the Staff's other responsibilities in assessing the effectiveness of the  
22 alternative regulation plan at the conclusion of each year of the proposed three-year time  
23 frame for its alternative regulation plan.

1           Q.     Are there other items that should be included in a reporting mechanism to  
2 assist in monitoring the success of any alternative regulation plan approved by the  
3 Commission?

4           A.     Yes.   The Company should report a list of “best practices” that it  
5 implements for the customer services area during the term of an alternative regulation  
6 plan.

7           Q.     What are “best practices?”

8           A.     Best practices are normally defined as documented strategies, methods and  
9 programs that are viewed as particularly effective and efficient, that represent a break  
10 from the established methods to reach greater efficiencies or effectiveness. These  
11 methods are judged as being superior to other available approaches. A best practice may  
12 actually represent a more effective way to address a particular issue or procedure. It is  
13 important to keep in mind that cost analysis is an important aspect of making the decision  
14 to implement what might be viewed as a best practice. As an example, a company may  
15 be recognized for a customer guarantee program that offers the customer financial  
16 reimbursement for missed appointments with the customer. This reporting would give  
17 the Company an opportunity to identify its accomplishments to improve service and  
18 efficiency in areas it believes its methods are outstanding.

19          Q.     Does Staff receive reports on service indicators and best practices from  
20 other utilities?

21          A.     Yes.   Currently, the Staff receives reports from Missouri Gas Energy,  
22 Atmos Energy Company, Missouri Public Service Division of Aquila, Inc. and Missouri-  
23 American Water. These reports are received in order to monitor the level of customer

1 service being provided on matters related to call centers and distribution reliability.

2 These reports are a result of merger cases over the last three years at the Commission.

3 The reporting of service indicators has allowed the Staff to better identify  
4 level of service being provided to customers. It provides the Staff with indications of  
5 what customers are experiencing when they attempt to contact the company. It has also  
6 presented opportunities for the Staff and companies to pinpoint problems revealed by the  
7 indicators and discuss solutions focused on resolving these problems expeditiously.

8 Q. Should the reporting and maintenance of this information limit the  
9 Commission's, the Staff's or the Office of the Public Council's (OPC) ability with  
10 respect to discovery or any other regulatory action concerning the area of customer  
11 service?

12 A. No. The reporting and maintenance of information on customer service  
13 indicators should in no way hinder or impair the Commission's, the Staff's or OPC's  
14 responsibilities to review, question or address inquiries or complaints regarding customer  
15 service functions at the Company. One of the basic responsibilities of the Commission,  
16 the Staff and OPC is to ensure that the utilities under the Commission's jurisdiction  
17 provide safe and adequate service.

18 Q. Does the Staff presently maintain any information on the number of  
19 complaints that the Commission's Consumer Services Department has received on the  
20 Company?

21 A. Yes. The Staff maintains this data for all of the companies that the  
22 Commission regulates. The information is periodically reviewed to monitor trends in the

1 number of complaints that a company is receiving. I have attached information  
2 pertaining to the Company labeled as Schedule 4.

3 Q. What does Schedule 4 illustrate?

4 A. The graph shows the number of complaints on the basis of complaints per  
5 1,000 customers for years 1998 through March 2002. The number of complaints for year  
6 2001 was dramatically reduced from years 1998, 1999 and 2000. Information for the first  
7 quarter of 2002 has however shown an increase. It should be noted that for the years  
8 1998 through 2000 the Company operated under the second EARP. The second EARP  
9 expired in June 2001.

10 The Staff will monitor this indicator to determine if it continues to trend  
11 upward. If the trend continues, there should be no restriction created by an alternative  
12 regulation plan that restricts the Staff's ability to bring these matters to the Commission's  
13 attention.

14 Q. Does the Company mention the impact of the EARP upon the  
15 implementation of projects designed to enhance customer service in rebuttal testimony?

16 A. Yes. Thomas R. Voss on page 10 of his rebuttal testimony notes what he  
17 characterizes as a "positive impact" that EARP had upon the implementation of projects  
18 designed to enhance customer service functions. He specifically mentions the automated  
19 reading system, the customer billing system, and call center functions.

20 The Staff is concerned by the inferences noted here and made throughout  
21 the Company's filing that the achievement of what it terms as quality customer service is  
22 the direct result of the EARP, and that these advances and achievements may not have  
23 occurred absent it. Other companies in Missouri regulated by this Commission have

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1 implemented similar programs and processes without the “incentive” of an EARP. For  
2 example, Kansas City Power and Light was reading the majority of its residential meters  
3 by an automated system by December of 1997. For another example, the Staff would cite  
4 the installation in year 2001 of a virtual hold system at the Atmos Energy Company call  
5 center to assist in reducing customer wait. These companies have seen these programs as  
6 necessary, efficient and cost justified to provide customers with good service.

7 Q. Does this conclude your surrebuttal testimony?

8 A. Yes, it does.

