

Exhibit No. 31

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Electric Company d/b/a Liberty
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**Before the Public Service Commission
of the State of Missouri**

Surrebuttal Testimony

of

Candice Kelly

on behalf of

The Empire District Electric Company d/b/a Liberty

September 17, 2025



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THE EMPIRE DISTRICT ELECTRIC COMPANY D/B/A LIBERTY
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Candice Kelly. My business address is 602 S. Joplin Avenue, Joplin,
4 Missouri, 64801.

5 **Q. Are you the same Candice Kelly who provided direct and rebuttal testimony in**
6 **this matter on behalf of The Empire District Electric Company d/b/a Liberty**
7 **(“Liberty” or the “Company”)?**

8 A. Yes.

9 **Q. What is the purpose of your surrebuttal testimony in this proceeding before the**
10 **Missouri Public Service Commission (“Commission”)?**

11 A. I address portions of the rebuttal testimony of Commission Staff (“Staff”) witness
12 Charles Tyrone Thomason, Renew Missouri witness Jessica Polk Sentell, and Office
13 of the Public Counsel (“OPC”) witness Dr. Geoff Marke, related to customer service
14 and billing issues. Several of these topics are also addressed from a broader policy
15 perspective in the surrebuttal testimony of Liberty witness Amy M. Walt.

16 **II. RESPONSE TO COMMISSION STAFF**

17 **A. Call Center**

18 **Q. In his surrebuttal testimony, Staff witness Thomason acknowledges that several**
19 **call center metrics that increased in April 2024 have since returned to normal**
20 **levels (Call Volumes, Average Customer Talk Time and Average Not Ready**
21 **Time). However, Mr. Thomason also mentions other Call Center metrics**

1 **(Abandoned Call Rate (“ACR”), Average Speed of Answer (“ASA”), and Service**
2 **Level). What is the current status of those items?**

3 A. All call center performance metrics, including ACR, ASA, and Service Level, have
4 returned to normal operating levels. These improvements reflect the Company’s
5 ongoing efforts to stabilize operations and enhance the customer experience following
6 the initial challenges of the Customer First transition.

7 **Q. Mr. Thomason notes that agents from other regions assisting Empire with calls**
8 **do not have access to Customer Watch. Is that accurate, and do you consider it a**
9 **concern?**

10 A. It is correct that agents from other regions do not have direct access to Customer Watch,
11 which is a legacy system used primarily for historical account information. However,
12 I do not view this as a significant concern today. We’ve established clear protocols to
13 ensure that if an agent requires information from Customer Watch, they promptly
14 escalate the request to a local agent with access, ensuring the customer receives
15 accurate and timely support. Importantly, as we continue to operate with the SAP
16 system, the need to reference legacy data has steadily declined. Most customer
17 interactions now rely on current SAP data, which is fully accessible to all agents. While
18 Staff’s concern is understandable, the Company’s strengthened internal coordination-
19 combined with a declining reliance on legacy data in Customer Watch -will continue
20 to minimize any impact on customer service quality moving forward.

21 **Q. Staff witness Thomason notes that customers have reported inconsistent and**
22 **sometimes contradictory information from call center representatives. What**
23 **steps is Liberty taking to ensure consistent communication?**

1 A. Liberty has reinstated call quality monitoring and continues to provide targeted training
2 for customer service representatives who require additional support. Beyond training,
3 we are actively redesigning key workflows – from meter reading to billing and
4 collections -to streamline processes, reduce wait times, and eliminate unnecessary
5 handoffs. These improvements, guided by a LEAN operating system as outlined in
6 Ms. Walt’s testimony, are designed to empower frontline staff with the tools and clarity
7 needed to deliver consistent, accurate information to our customers.

8 **Q. Mr. Thomason recommends that Empire establish a process for customer**
9 **callbacks that effectively records the need for a callback, tracks the status of that**
10 **callback, and verifies the execution of the callback within a reasonable period of**
11 **time following the request. What steps has Liberty taken in regard to customer**
12 **call backs?**

13 A. Liberty currently has a process in place for tracking call backs in relation to the
14 escalation process. If a Senior CSR is not able to immediately take the escalated call,
15 an email is sent to a shared inbox and assigned to a Senior CSR to complete the call
16 back. The Senior CSRs are advised that callbacks are to take place the same day or, at
17 the very least, within twenty-four hours depending on the time of day when the call is
18 escalated. This inbox is monitored by the supervisors and managers to verify execution
19 of the call back. The topic of customer callbacks was also recently discussed during a
20 customer service staff meeting held on September 6, 2025.

21 **Q. Staff witness Thomason discusses Commission Rule 20 CSR 4240-13.045(9)28,**
22 **which requires utilities to inform customers of their right to file a complaint with**
23 **the Commission if the utility is unable to resolve a dispute to the customer’s**

1 **satisfaction. Has Liberty taken any steps to ensure that this notification is**
2 **provided to customers?**

3 A. Yes, Liberty understands the importance of this rule and will continue to train all
4 customer service staff on how to escalate complaints, which includes the customer's
5 right to contact the Commission's Consumer Services Department. CSRs are trained to
6 first attempt to resolve the complaint. If the initial CSR is unable to resolve the
7 complaint, the next step is to utilize the assistance of a Senior CSR (Representative II).
8 If the Senior CSR is unable to resolve the complaint, the customer will be referred to
9 either a specialist or supervisor and finally, a manager. If, at any time, the customer
10 asks for an additional step or specifically asks for the contact information for the
11 Missouri Public Service Commission, the CSR, supervisor, or manager will provide
12 that information. There are also instances, depending on the customer or the specific
13 complaint, that a CSR may reach out directly to a supervisor or manager at their
14 discretion. Moreover, the contact information for the Commission's Consumer
15 Services Department is also included in the Company's booklet provided to all new
16 customers and on the customer invoice.

17 **Q. Mr. Thomason suggests that CSR Satisfaction, Call Satisfaction, and Call**
18 **Resolution metrics remain below pre-Customer First levels. Do you agree with**
19 **that assessment?**

20 A. While it's true that some metrics initially declined following the Customer First
21 transition, we've seen steady and measurable improvement since 2024. As detailed in
22 Ms. Walt's surrebuttal testimony, first call resolution and customer satisfaction scores
23 – based on post-call surveys – have continued to trend upward. These gains reflect the

1 Company's focused efforts to enhance service quality and rebuild customer trust, and
2 we remain committed to further progress.

3 **Q. Staff witness Thomason discusses the account notes issue that came up within**
4 **Case No. WR-2024-0104 (*Order Approving Stipulation and Agreement* (effective**
5 **February 2, 2025) and suggests that Staff's preliminary review of sample calls that**
6 **took place in April 2025, and the associated account notes, found instances where**
7 **calls should have generated account notes but did not, inconsistencies regarding**
8 **when notes are taken, and a lack of detail regarding the discussion that took place**
9 **during the call. What has Liberty done to continue to improve the use of account**
10 **notes?**

11 A. Liberty has taken several steps to strengthen the consistency and quality of account
12 documentation. Proper note-taking is emphasized in both new hire training and
13 ongoing coaching for CSR's. Most recently, in early September 2025 Liberty held a
14 dedicated staff meeting focused on reinforcing expectations around account
15 documentation, including when and how notes should be entered and the level of detail
16 required.

17 **Q. Mr. Thomason closes his call center comments by making four recommendations.**
18 **How do you respond to those recommendations?**

19 A. Liberty does not object to Mr. Thomason's recommendations. In fact, we believe the
20 Company has already taken meaningful steps to implement each of them.

21 **B. Disconnection Notices**

22 **Q. Staff witness Thomason references ongoing customer feedback in 2025 indicating**
23 **that disconnection notices are being received before bills. Can you explain the**
24 **cause of this issue.**

1 A. Yes. This issue arose in specific cases where accounts were reversed and reissued.
2 During that process, the document date on the new invoice was inadvertently set in the
3 past, which caused the system to interpret the bill as immediately past due upon
4 issuance. As a result, disconnection notices were triggered before customers had a
5 chance to receive or review their updated invoice.

6 **Q. What did Liberty do to address this situation?**

7 A. The issue was identified as a training gap, and team members were promptly instructed
8 on the correct procedures. Since that training was completed, I'm not aware of any
9 further instances where this problem has occurred, indicating that the corrective action
10 was effective.

11 **C. Self-Serve Options**

12 **Q. What is My Account?**

13 A. My Account is Liberty's online self-service portal designed to give customers
14 convenient, 24/7 access to manage their utility services. Through the portal, customers
15 can make payments, start or stop service, receive billing and outage alerts, and if
16 equipped with an AMI meter-view their electricity usage in near real time.

17 **Q. Staff witness Thomason indicates that during the last week of April, storms caused
18 a major outage event that affected over 23,000 Empire customers and that after
19 that event, My Account was showing those customers used electricity during time
20 periods the customer was without service. What was the cause of this situation?**

21 A. As Mr. Thomason indicates, the system is designed to automatically estimate interval
22 read data when it does not receive communication from the meter connected to the
23 account, and it did so during the outages as it could not tell whether the absence of data
24 was the result of an outage or because some other issue prevented transmission.

1 **Q. Did this impact customers' bills?**

2 A. No, customers' bills were not affected. When the AMI system came back online after
3 the outage, it updated with actual usage data, which was used by the billing system to
4 generate accurate invoices. In instances where actual data was unavailable the
5 Company followed its established estimation process. My Account, however, operates
6 separately from the billing system and is not designed to retroactively retrieve actual
7 reads. As a result, it continued to display estimated usage, even though customers were
8 billed correctly based on updated meter data. The Meter Data Management (MDM)
9 system, which integrates with both MyAccount (SEW) and the Customer Information
10 System (SAP), stores 15-minute interval data that is estimated when unavailable—most
11 commonly due to communication issues. MyAccount displays usage based on this
12 interval data, which may show usage during outages. As noted above, there is no issue
13 to be addressed regarding customers' bills.

14 **Q. Mr. Thomason indicates that Staff believes there has been a significant increase**
15 **in the number of missing payment inquiries. Do you agree and, if so, what is the**
16 **cause?**

17 A. With the transition to the new CIS there has been an increase in the number of missing
18 payment inquiries. This can be attributed to customer account numbers changing, the
19 mailing address for payments changing, customers sending bills to the old mailing
20 address causing a delay in posting, scanning issues experienced by Liberty's lockbox
21 processor, and payments lost in the mail.

22 **Q. How has Liberty addressed this issue?**

23 A. Liberty investigates every missing payment inquiry thoroughly and contacts the
24 customer once the payment has been identified and resolved. In some cases, the issue

1 stems from the customer's end – such as a failed transaction or incorrect account
2 information-which may require an additional payment to bring the account current.
3 Our goal is to ensure transparency and timely communication through the resolution
4 process.

5 **Q. Staff witness Thomason raises concerns about Autopay customers potentially**
6 **missing important billing information, suggesting that a “bill-up letter” alone may**
7 **not be sufficient to alert them to changes in their Autopay. How do you respond?**

8 A. Liberty understands and appreciates Staff's concern regarding Autopay
9 communication. We recognize that some customers may rely solely on automatic
10 payments and may not regularly review mailed billing notices. To address this, Liberty
11 is enhancing its outreach efforts by supplementing the bill-up letter with direct phone
12 outreach to affected customers. This added layer of communication will help ensure
13 that Autopay participants are more fully informed of any changes to their billing
14 arrangements, reinforcing our commitment to transparency and customer trust.

15 **Q. Mr. Thomason indicates that Staff has received feedback from Empire customers**
16 **stating that the amount shown on their bill often does not match the balance**
17 **displayed online through My Account. Do you believe this situation exists, and if**
18 **so, what is the cause?**

19 A. While Liberty is not aware of widespread issues, we acknowledge that discrepancies
20 may occur in specific situations. For instance, in cases where a correction is made to
21 an invoice after it has been issued, those updates may not immediately sync with My
22 Account. Liberty is actively working to improve system integration and
23 synchronization between our billing platform and the My Account portal to ensure
24 consistency and clarity for our customers.

1 **D. Third Consecutive Estimate Letter**

2 **Q. Mr. Thomason alleges that from April to July 2024, 156 Empire customers had**
3 **their bills estimated a third consecutive time and that there was thus a violation**
4 **of Commission Rule 20 CSR 40240-13.020(3) and the Company’s tariff. What is**
5 **your response?**

6 A. Yes, there was a delay in sending the third consecutive estimate letters to customers
7 between April and July 2024. However, Commission Rule 20 CSR 40240-13.020(3)
8 and the Company’s tariff do not specify a required timeframe for when such
9 notifications must be sent. Instead, the rule prescribes the method of communication-
10 specifically, that notice must be provided by first-class mail or personal delivery.
11 Liberty acknowledges the delay and as of March 2025 has automated these
12 notifications to ensure consistent and compliant delivery in accordance with
13 Commission rules and tariff obligations.

14 **E. Tariff**

15 **Q. Mr. Thomason recommends tariff changes to align with Missouri regulations.**
16 **What is Liberty’s position and what corrective actions are being taken?**

17 A. Liberty fully agrees that its tariffs should reflect and comply with Missouri regulations.
18 The Company is in the process of reviewing the relevant provisions and will make the
19 necessary updates to ensure alignment and clarity for both regulators and customers.

20 **III. RESPONSE TO RENEW MISSOURI**

21 **Q. With the rebuttal testimony of Ms. Sentell, Renew Missouri supports a**
22 **continuation of a disconnection moratorium, with late fees additionally being**
23 **suspended. What is Liberty’s position on these recommendations?**

1 A. Liberty agrees that customer protections are important, especially during periods of
2 economic hardship. We understand the need to support customers who have had billing
3 concerns and who have affordability concerns and ensure they are connected to all
4 available resources and support. Moratoriums can create a more difficult situation for
5 customers by growing balances to levels where payment plans and outside resources
6 are no longer effective to support customers. We believe in timely support that offer
7 resolutions and clear communication for customers. We are also supportive of waiving
8 fees and offering payment plans in instances where there has been confusion and delays
9 on our part. Given the widespread billing issues following Customer First, the
10 Company has voluntarily suspended any disconnect for non-pay activity. We will
11 continue to work with Staff and OPC on the appropriate timing and approach to
12 reinstate disconnects.

13 **Q. Ms. Sentell also asserts that a portion of net-metered customers experienced**
14 **financial harm from improper accounting of bill credits and she suggests that**
15 **there should be a bill credit or other compensation for customers with verifiably**
16 **incorrect calculations of energy consumption versus offset. How do you respond**
17 **to this recommendation?**

18 A. Liberty is not currently aware of any customers, as it relates to net metering, who have
19 been incorrectly billed. The issue isn't that customers are being billed incorrectly or
20 that credits are being misapplied. Rather, many customers don't fully understand how
21 net metering works; specifically, how solar energy flows into their home and offsets
22 usage before any excess is sent to the grid. A common misconception is that the total
23 solar energy produced during a billing cycle should appear as a credit or line item on
24 their statement. However, the system first uses the solar energy to power their home in

1 real time, and only the surplus is exported to the grid and reflected on their net metering
2 statement.

3 **IV. RESPONSE TO OPC**

4 **Q. On page 20 of his rebuttal testimony, Dr. Marke notes that he recommended cost**
5 **disallowances associated with “ancillary costs” for Customer First (billing, meter**
6 **and customer service representative costs). He then states: “(d)ue to internal**
7 **miscommunication, the discovery I had drafted did not get issued. As such, I will**
8 **update the specific cost disallowance amounts in surrebuttal testimony.” How do**
9 **you respond?**

10 A. While it is difficult to respond in detail to testimony that has yet to be filed, I would
11 note that the proposed disallowances are not warranted. The Company’s cost of service
12 in this case reflects test year levels of spending that are necessary, used, and useful in
13 providing service to customers. These costs have not been adjusted or distorted by the
14 Customer First implementation.

15 **Q. Does this conclude your surrebuttal testimony at this time?**

16 A. Yes.

VERIFICATION

I, Candice Kelly, under penalty of perjury, on this 17th day of September, 2025, declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Candice Kelly