

FILED³

AUG 24 2018

**Missouri Public
Service Commission**

Exhibit No.:

111

Issue:

Quality of Service

Witness:

Dana Parish

Sponsoring Party:

MoPSC Staff

Type of Exhibit:

Surrebuttal Testimony

Case No.:

WR-2018-0170

Date Testimony Prepared:

August 3, 2018

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

CUSTOMER EXPERIENCE

SURREBUTTAL TESTIMONY

OF

DANA PARISH

**LIBERTY UTILITIES (MISSOURI WATER), LLC
d/b/a LIBERTY UTILITIES**

CASE NO. WR-2018-0170

*Jefferson City, Missouri
August 2018*

Exhibit No. 111

Date 8-16-18 *Reporter* TP

File No. WR-2018-0170

1 SURREBUTTAL TESTIMONY

2 OF

3 DANA PARISH

4 LIBERTY UTILITIES (MISSOURI WATER), LLC
5 d/b/a LIBERTY UTILITIES

6 CASE NO. WR-2018-0170

7 Q. Please state your name and business address.

8 A. My name is Dana Parish, and my business address is 200 Madison Street,
9 P.O. Box 360, Jefferson City, Missouri 65102.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by the Missouri Public Service Commission as a Utility Policy
12 Analyst I in the Customer Experience Department of the Commission Staff Division.

13 Q. Please state your educational background and experience.

14 A. A copy of my work and educational experience is attached as Schedule DP-s1
15 to this surrebuttal testimony.

16 Q. Did you file direct or rebuttal testimony in this case?

17 A. No.

18 Q. What is the purpose of your surrebuttal testimony?

19 A. The purpose of my surrebuttal testimony is to address concerns raised during
20 the Question and Answer session and testimony at the Local Public Hearing in Branson,
21 Missouri on Monday, July 23, 2018 at 6:00 p.m. (Local Public Hearing). Customers
22 commented on the lack of customer notices by Liberty and customers shared concerns with
23 Liberty's call center and overall customer service.

Surrebuttal Testimony of
Dana Parish

1 Q. Please describe the concern regarding customer notices.

2 A. Liberty customers testified that they are not receiving important Company
3 notices. Examples include notices of boil advisories and notice of Local Public Hearings.

4 Q. Did the Company respond to these statements during the Question and
5 Answer session?

6 A. On the day of the hearing, the Company stated that roughly 85 (eighty-five)
7 Local Public Hearing notices were returned for insufficient addresses.

8 Q. Is Staff following up on the return of Local Public Hearing notices?

9 A. Yes. On July 26, 2018, Staff sent data requests to investigate if the Company
10 provided notice of hearing, as ordered in Commission Order Setting Local Public Hearings.¹

11 Q. Did the Company address customers not receiving boil order notices, as
12 mentioned in customer testimony?

13 A. Somewhat. Company personnel asked the customer testifying what she felt
14 may be the best way to get the notice out to customers. Staff requested that Liberty
15 specifically identify their procedures for notifying customers at each water system, and
16 differences among systems.

17 Q. How did the customer respond?

18 A. The Customer suggested posting notices on each of the condominium
19 buildings.

20 Q. Please describe the concern expressed at the Local Public Hearing regarding
21 customer call center issues.

¹ Liberty Utilities (Missouri Water), LLC d/b/a Liberty Utilities, Case No. WR-2018-0170, *In the Matter of the Application of Rate Increase Request for Liberty Utilities (Missouri Water), LLC d/b/a Liberty Utilities*, Order Setting Local Public Hearings, July 10, 2018, page 2, item 3.

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1 A. Customers testified that it is difficult to reach a live person when calling the
2 customer service number. Some calls would reach no one; while other calls reached a live
3 person and then the customer was passed on to other Company personnel's voicemail. Some
4 customers described frustration after being transferred multiple times. A condominium
5 Property Manager noted that her 200 (+) condominium owners would contact her because the
6 owners felt it was easier than reaching the Company.

7 Staff is unclear whether the trouble reaching Company personnel via the customer
8 service phone number was during or after regular business hours.

9 Q. How did Liberty representatives respond at the Local Public Hearing to
10 customer concerns?

11 A. The Company responded that customers could be using old contact numbers.

12 Q. Has Staff recently discussed call center and customer service issues with
13 the Company?

14 A. Yes. During Staff's investigation, Staff identified a number of issues with the
15 Company's customer service, including call center issues. This issue was previously
16 addressed in Staff's Partial Disposition Agreement signed by Staff, the Company and OPC,
17 and filed in this case on May 24, 2018.

18 Q. What specifically did the Company agree to do in the Partial Disposition
19 Agreement regarding the customer service phone number?

20 A. The Company agreed in the Partial Disposition Agreement that:

21 (2) Within thirty (30) days of the effective date of an order
22 approving this Partial Disposition Agreement, the Company agrees to
23 implement the recommendations contained in the Customer Experience
24 Department Report, attached hereto as Attachment B and incorporated by
25 reference herein, and provide proof of implementing the recommendations

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1 to the Manager of the Commission's Customer Experience Department and
2 to OPC:

3 (a) The Company's call center representatives will include the
4 Company name "Liberty Utilities" in the opening response to after-hours
5 telephone calls;

6 (b) The Company agrees to ensure the accuracy of information
7 presented on all Company billing statements.

8 (c) The Company agrees to use the four (4) credit criteria provided
9 in Commission Rule 4 CSR 240-13.030(C) when determining whether it
10 may collect a deposit from new customers.

11 (d) The Company agrees to comply with Commission Rule 4 CSR
12 240-13.040.

13 (e) The Company agrees to review and update the information
14 presented in the Company rights and responsibilities brochure and website
15 to eliminate all inaccurate statements and ensure that this information is
16 consistent with Company practices and Commission rules. (A link to the
17 Company's tariffs must be provided.)

18 In particular, in paragraph (2)(b) Liberty agreed to ensure the accuracy of the information
19 presented on all Company billing statements. Staff expects this to include any contact
20 information for Liberty, including telephone numbers.

21 Staff followed up with a data request on July 26, 2018, to obtain more information on
22 this issue.

23 Q. Does Staff have additional recommendations at this time?

24 A. Staff is still investigating the issues raised by customers at the Local Public
25 Hearing in Branson on July 23, 2018, and may make further recommendations after the most
26 recent data request responses are received.

27 Q. Does this conclude your surrebuttal testimony?

28 A. Yes.

Dana Parish

Educational Background and Work Experience:

I am a Utility Policy Analyst I, in the Customer Experience Department, Commission Staff Division of the Missouri Public Service Commission. I have been employed by the Missouri Public Service Commission since January 2000.

I have a Bachelor of Arts degree in Business Management. While at the Commission I have worked in the Utility Services Department, Telecommunications Department, and the Customer Experience Department; as well as for Commissioner Sheila Lumpe and Chairman Robert M. Clayton III. Prior to joining the Commission, I was employed as a Business Tax Specialist with the Missouri Department of Revenue.

Case Summary:

Presented analysis on the following cases and proceedings:

- TO-2013-0416 and TO-2015-0032, Reduction of the Relay Missouri Surcharge
- CC Docket Nos. 96-45/WC Docket No. 10-90, Annual Certification of Support for Eligible Telecommunications Carriers Pursuant to 47 C.F.R. 54.314, 2009-2012
- TW-2012-0012 and TO-2012-0364, Staff's Investigation into the Practices and Procedures of Companies Offering Low Income (Lifeline) or Disabled Universal Service Fund Discounts in the State of Missouri
- CO-2010-0054, Staff Recommendation Regarding DPI Teleconnect's Application for ETC Status on a Wireless Basis
- CO-2012-0043, Staff Recommendation Regarding Budget PrePay, Inc.'s Application for ETC Status on a Wireless Basis

cont'd Dana Parish

- CO-2012-0282, Staff Recommendation Regarding Fidelity 1 Inc.'s Application to Amend and Expand Designation as an Eligible Telecommunications Carrier
- LA-2013-0482, Staff Recommendation for Approval of Certificate and/or Initial Tariff
- RA-2011-0298, Staff Recommendation Regarding Assurance Home Phone Service, Inc. d/b/a Surety Wireless' Application for ETC Status on a Wireless Basis
- RA-2011-0299, Staff Recommendation Regarding Global Connection, Inc. of America's Application for ETC Status on a Wireless Basis
- RA-2011-0349, Staff Recommendation Regarding Aegis Telecom, Inc.'s Application for ETC Status on a Wireless Basis
- RA-2011-0376, Staff Recommendation Regarding YourTel America Inc.'s Application to Expand Wireless Lifeline Service
- RA-2011-0384, Staff Recommendation Regarding Assist Wireless, LLC's Application for ETC Status on a Wireless Basis
- RA-2012-0076, Staff Recommendation Regarding Cintex Wireless, LLC's Application for ETC Status on a Wireless Basis
- RA-2012-0264, Staff Recommendation Regarding Assurance Wireless brought to you by Virgin Mobile's Application for ETC Status on a Wireless Basis
- RA-2013-0115, Staff Recommendation to Grant ETC Status to Boomerang Wireless, LLC d/b/a enTouch Wireless
- RA-2014-0225, Staff Recommendation to Grant ETC Status to American Broadband and Telecommunications Company d/b/a American Assistance
- WM-2018-0116 and SM-2018-0117, Staff Recommends Approval of Transfer of Assets, Transfer of Certificates of Convenience and Necessity, and Issuance of Certificate of Convenience and Necessity, Confluence Rivers Utility Operating Company, Inc.
- TA-2010-0146, Staff Recommendation Regarding Budget PrePay Inc.'s Application for ETC Status
- TA-2010-0229, Staff Recommendation Regarding Cricket Communications, Inc. Application for ETC Status
- TA-2011-0164, Staff Recommendation Regarding Easy Telephone Service Company d/b/a Easy Wireless' Application for ETC Status on a Wireless Basis
- TA-2011-0377, Staff Recommendation Regarding i-wireless, LLC's Application for ETC Status on a Wireless Basis

cont'd Dana Parish

- TA-2012-0128, Staff Recommendation Regarding Chariton Valley Telecom Corporation's Application for ETC Status
- TA-2013-0272, Staff Recommendation Regarding Blue Jay Wireless, LLC's Application for ETC Status on a Wireless Basis
- TA-2014-0236, Staff Recommendation for Approval of Certificate and/or Initial Tariff of Flowroute LLC
- TA-2014-0345, Staff Recommendation for Approval of Certificate and/or Initial Tariff of BCN Telecom, Inc.
- TO-2011-0073, Statutory Requirement to Determine Statewide Average Rate
- TO-2015-0032, Reduction of Relay Missouri Surcharge
- TO-2017-0168, Reduction of Relay Missouri Surcharge
- XO-2011-0062, Staff Recommendation Regarding Telrite Corporation's Application for ETC Status on a Wireless Basis
- GR-2018-0013, Rebuttal Testimony, Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utility

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

In The Matter of the Application of Rate Increase for)
Liberty Utilities (Missouri Water), LLC d/b/a)
Liberty Utilities) Case No. WR-2018-0170

AFFIDAVIT OF DANA R. PARISH

State of Missouri)
) ss
County of Cole)

COMES NOW Dana R. Parish, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Surrebuttal Testimony*, and that the same is true and correct according to her best knowledge and belief.

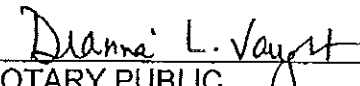
Further the Affiant sayeth not.



Dana R. Parish

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 31st day of July, 2018.



NOTARY PUBLIC

