

Exhibit No.:
Issue(s): *Quality of Service,*
Customer Service
Witness: *Scott J. Glasgow*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *ER-2021-0312*
Date Testimony Prepared: *December 20, 2021*

MISSOURI PUBLIC SERVICE COMMISSION
FINANCIAL & BUSINESS ANALYSIS DIVISION
CUSTOMER EXPERIENCE DEPARTMENT

REBUTTAL TESTIMONY

OF

SCOTT J. GLASGOW

THE EMPIRE DISTRICT ELECTRIC COMPANY
d/b/a Liberty

CASE NO. ER-2021-0312

Jefferson City, Missouri
December 2021

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **SCOTT J. GLASGOW**

4 **EMPIRE DISTRICT ELECTRIC COMPANY,**
5 **d/b/a Liberty**

6 **CASE NO. ER-2021-0312**

7 Q. Please state your name and business address.

8 A. My name is Scott Glasgow and my business address is Missouri Public Service
9 Commission, P.O. Box 360, Jefferson City, MO 65102.

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

11 A. I am employed by the Missouri Public Service Commission (“Commission”) as
12 a Senior Research/Data Analyst.

13 Q. Are you the same Scott Glasgow that supported testimony in Staff’s Cost of
14 Service Report filed on October 29, 2021 in this case?

15 A. Yes, I am.

16 Q. What is purpose of your rebuttal testimony?

17 A. The purpose of my rebuttal testimony is to respond to the direct testimony filed
18 by Empire District Electric Company’s (“Empire”) witness Jon Harrison in regards to the
19 adequacy of Empire’s customer notifications. I will also address whether Empire should take
20 additional steps to notify customers that there will no longer be a fee associated with credit/debit
21 card payments.

22 **CREDIT CARD FEES**

23 Q. Can you explain what Empire requested concerning the direct charge customers
24 paid for making payments by credit/debit cards in Case No. ER-2019-0374?

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1 A. Empire requested it be authorized to stop directly charging customers a fee for
2 making payments by credit/debit card, and for the indirect processing fees instead to be included
3 in the Empire’s revenue requirement.

4 Q. Did Empire give a reason why they requested the elimination of direct fees of
5 credit/debit card payments?

6 A. Yes. In Case No. ER-2019-0374, Empire’s witness Brent Baker stated in his
7 direct testimony that “The Company utilizes customer surveys to determine the most pressing
8 issues to our customers. Customers have consistently reported that ease of bill payments is a
9 priority, including having no fees for card payments.” Brent continued that customers, “have
10 increased desire...to pay electronically.”¹

11 Q. Was this request granted by the Commission?

12 A. Yes. This request was granted by the Commission, with certain tasks to be
13 completed by Empire as described in the *Amended Report and Order*.²

14 Q. After the Commission approved the elimination of direct fees for payments with
15 credit/debit cards, how did Empire communicate to customers about this change?

16 A. Mr. Harrison’s direct testimony states, “There was an alert added to the
17 Company’s website on the home page as well as on the payment page, customers who had an
18 email address on file received an email, and letters were mailed to all Commercial customers
19 who used online payments or IVR payment system within the last year.”

20 Q. Did Empire share its communication plan on how it intended to educate
21 customers about the change in the direct charge of credit/debit cards with Staff?

¹ Case No. ER-2019-0374, Direct Testimony Brent Baker, p. 9 and 10.

² ER-2019-0374, Amended Report and Order, p. 76.

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1 A. In part. Empire ceased charging a direct fee for payment by credit/debit cards on
2 September 16, 2020. Empire sent Staff and OPC an email with two attachments on October 8,
3 2020 at 5:47 pm, stating that an email would be sent on October 9, 2020, to gas and electric
4 customers. The overview of the emails to be sent to customers was “To provide customers with
5 information regarding the new look and feel by moving to the KUBRA system.” KUBRA is
6 Empire’s new payment processing vender. Empire also stated there would be updates on
7 Empire’s website payment page starting October 16, 2020. It was not clear that the content of
8 the email to Staff and OPC concerning the new payment system was intended to be the
9 communication plan to educate customers about the change in the direct charge of credit/cards
10 payments. Also, there was no mention in the email of the letter to be sent to
11 commercial customers.

12 Q. Does Staff have concerns with how Empire communicated the change that there
13 was no longer a direct charge for using credit/debit cards?

14 A. Yes. According to Empire, one of the reasons Empire wanted to make this
15 change is that customers expressed the desire for no fee in Empire’s surveys. At a minimum,
16 there should have been a communication to all of its customers. According to Empire, due to
17 Empire serving electric customers in other states, no message was placed on the
18 IVR (“Interactive Voice Response”) and the message on the website only stated “there may be
19 a processing fee for using this online payment process”.³ Emails were sent out to customers that
20 have an email on file but only around 50% of customers have an email on file⁴. Letters were
21 also sent to some commercial customers.

³ Staff Data Request No. 165.1.

⁴ Staff Data Request No. 165.1.

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1 Q. Does Staff have a suggestion to Empire to make sure all customers have an
2 opportunity to receive the message that there is no longer a direct fee to pay by
3 credit/debit cards?

4 A. Yes. Empire is required to send a billing statement to every customer. At least
5 one time, Empire should add a message to the billing statement that informs customers that
6 there is not a direct fee to pay their electric bills by credit/debit cards.

7 Q. To date, has Empire communicated this change on the billing statements?

8 A. No. According to the Empire, “A bill message was not used, due to bill
9 space limitation”⁵.

10 Q. Has Empire ever utilized bill messages in the past to inform customers of the
11 credit/debit card payment process and the associated fee?

12 A. Yes. Empire utilized the billing statements to inform customers of many
13 things including payment information. Prior to the Commission approving this change,
14 Empire informed customers of ways they can pay their bills using credit or debit cards and
15 that there was a fee for this. Here is an example from a customer’s billing statement from
16 November 8, 2019:⁶

17 Pay your bill with a credit or debit card by phone by simply calling
18 888-631-8973. Pay your bill online at www.empiredistrict.com. Choose
19 the Pay Your Bill option and select Make Payment. There is a
20 convenience fee for these services.

21 Q. If Empire utilized a bill message, does that guarantee a customer will read
22 the message?

⁵ Staff Data Request No. 165.1.

⁶ Informal complaint C202000886.

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1 A. No, but at least all customers have a chance to be informed that the process has
2 changed and can make payment decisions based off of that information.

3 Q. Does this conclude your rebuttal testimony?

4 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Request of The Empire)
District Electric Company d/b/a Liberty for) Case No. ER-2021-0312
Authority to File Tariffs Increasing Rates for)
Electric Service Provided to Customers in its)
Missouri Service Area)

AFFIDAVIT OF SCOTT J. GLASGOW

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

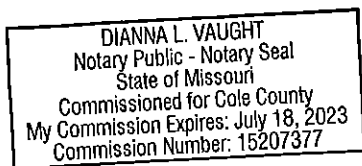
COMES NOW SCOTT J. GLASGOW, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Scott J. Glasgow*; and that the same is true and correct according to his best knowledge and belief.

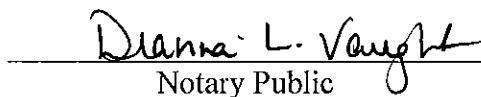
Further the Affiant sayeth not.


SCOTT J. GLASGOW

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 15th day of December, 2021.




Notary Public