Exhibit No.: Issues: Customer Service Witness: Brett C. Carter Sponsoring Party: Aquila Networks-MPS & L&P Case No.: ER-2004-0034 & HR-2004-0024 (Consolidated)

Before the Public Service Commission of the State of Missouri

APR 2 8 2004

Missouri Phoblic

Surrebuttal Testimony

of

Brett C. Carter

Exhibit No Case No(s). FR-2001 Date 203101 Rpt Rotr

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI SURREBUTTAL TESTIMONY OF BRETT C. CARTER ON BEHALF OF AQUILA, INC. D/B/A AQUILA NETWORKS-MPS AND AQUILA NETWORKS-L&P CASE NOS. ER-2004-0034 AND HR-2004-0024 (CONSOLIDATED)

Please state your name and business address. 1 Q. Brett Carter, 10700 E 350 Highway, Kansas City, MO 64138 2 A. By whom are you employed? 3 Q. Aquila, Inc. ("Aquila" or "Company"). 4 A. Please state your area of responsibility with Aquila. 5 Q. I am the Vice President of Central Services. In this position I am responsible for 6 Α. Aquila's centralized functions that support the Company's state utility operations 7 including the call center, customer account management, information technology, customer solutions and revenue assurance. 9 Describe your educational background. 10 Q. I graduated from Clarion University of Pennsylvania in May 1988 with a Bachelor of 11 Α. Science Degree in Accounting. I received my MBA from the University of 12 Pittsburgh (Pennsylvania) in May 1996. 13 Describe your work experience. 14 Q. I have worked in several operational and staff roles in industries ranging from 15 Α. national retail to over-the-counter consumer healthcare products to the energy sector. 16 The last 10 plus years of my career I have been in the energy industry. I joined 17 Consolidated Natural Gas (now Dominion) in 1993 before becoming employed by 18 Aquila in January of 1997. 19

Q. What is the purpose of your surrebuttal testimony filed in this case before the
 Missouri Public Service Commission ("Commission")?
 A. The purpose of my testimony is to respond to statements regarding the Company

A. The purpose of my testimony is to respond to statements regarding the Company's
service quality made by Commission Staff ("Staff") witness Lisa A. Kremer in her
rebuttal testimony.

Q. What specific statements are you responding to?

A. First, I am responding to the request made by Mrs. Kremer of her rebuttal testimony regarding formally ordered reporting of monthly Call Center statistics to the Commission.

Q. Does the Aquila believe that monthly reporting is a good indicator of whether the
Company is managing its Call Center appropriately?

Q. Why?

Α.

No.

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14A.Due to the cyclical nature of the utility business, there are swings both up and down15with regards to service level that are uncontrollable. A call center environment also16has uncontrollable short-term issues that can skew monthly reporting. Further, my17surrebuttal testimony in Case No. EF-2003-0465, clearly states on page 2 the reasons18quarterly reporting is more effective as:

Tracking and reporting the numbers, especially related to service quality are important to our overall improvement process and plans. Monitoring trends on a quarterly basis however, is a more effective way to communicate about our service levels especially given the plans we have to improve or maintain the current levels. A change to monthly reporting would create additional and unnecessary work under these circumstances.

26 Q. Are there other reasons why quarterly reporting is more effective?

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1	А.	Yes. Quarterly reporting will provide a much more accurate picture as to how we are
2		managing our customer services. Each quarter represents very different dynamics that
3		should be looked at as cyclical events. Taking a one month view is not a good
4		representation of how we are managing our to meet our metric objectives. We would like
5		to accompany the reporting of the quarterly statistics with a face to face meeting with the
6		Staff in order to discuss our plans and our successes.
7	Q.	Are there other statements that Mrs. Kremer makes in her rebuttal that you would like to
8		comment on?
9	А.	Yes. On page 5 of her rebuttal testimony she states that:
10 11 12 13		While the Company has indicated it is providing quality customer service, it does point to the need for improvement in its Call Center performance. These statements, however, do not identify the specific improvements being referred to.
15 14 15	Q.	What are your comments with respect to this statement?
16	A.	On page 2 of my surrebuttal testimony in Case No. EF-2003-0465, I specifically referred
17		to the quantitative measurements that Aquila currently provides to Staff on a quarterly
18		basis as average speed of answer, abandoned call rate and service levels. Furthermore on
19		page 3 of that surrebuttal, I specifically outline steps that we are taking to improve on
20		these metrics as:
21 22 23 24		Improvements are planned in three areas. First, with respect to personnel we are enhancing recruiting, hiring, retention, training, career planning and compensation plans. Second, business rule design focused on tariff compliance. Third enhancing technology we use to provide service to customers
25	Q.	Have you met with the Staff to discuss your improvements plans?
26	A.	Yes. We indicated to the Staff on October 15, 2003 in a meeting with Mrs. Kremer that
27		we had plans to increase the number of Call Center personnel. We feel that we are

moving forward aggressively with our stated plans to address our customer service
issues.

3 Q. Have any of these improvements been implemented?

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4	A.	Yes. Our staffing levels have been positive	ly impacted with the changes that we have put
5		in place. In the fourth quarter our average a	agent staffing level was at 180 FTE's, which
6	, .	was an additional 37 agents above the budg	et. Our 2004 budget was set to include 175
7		FTE's. We have allowed for an additional	three supervisory roles of which two are in
. 8		place, with the expectation of the third bein	g in place by the end of the first quarter of
9		2004. As noted in my surrebuttal testimony	y in Case No. EF-2003-0465 Schedule BC-1,
10		we implemented new interactive voice resp	onse features in the second quarter of 2003.
11		These business enhancements have already	had a positive impact on the business, that
12		can be seen over the last quarter of 2003.	
13	Q.	What have been the results of the improven	nents that were made in 2003?
14	A.	The fourth quarter results for 2003 are as fo	ollows:
15	÷	Service Level Quarter	74% of all calls answered in 20 seconds
16		Average Speed of Answer (ASA)	51 Seconds
17		Abandon Call Rate (ACR)	4.5%
18		These statistics are a direct reflection of Aq	uila's commitment to quality service for its
19		customers. This trend of information shows	s that all of the efforts that we have been
20		putting into improving our customer service	e is working. But again, examining this data
21		one month at a time would not have provide	ed for a clear depiction of the affects of our
22		enhancements.	
23	Q.	Has Staff previously recommended service	statistics that Aquila should meet?

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1	Α.	Yes. In Case No. EM-2000-292, Staff recommended, in its rebuttal testimony, that the
2		Company Average Speed of Answer objective be set at 65 seconds. In Case No. EF-
3		2003-0465 Staff's recommendation for Abandoned Call Rate is 8%. As you can see
4		above the 4 th quarter 2003 statistics exceed those recommendations.
5	Q.	Does this conclude your testimony?

6 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of Aquila, Inc. d/b/a Aquila Networks-MPS and Aquila Networks-L&P, for authority to file tariffs increasing electric rates for the service provided to customers in the Aquila Networks-MPS and Aquila Networks-L&P area

Case No. ER-2004-0034

In the matter of Aquila, Inc. d/b/a Aquila Networks-L&P, for authority to file tariffs Increasing steam rates for the service provided To customers in the Aquila Networks-L&P area

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Case No. HR-2004-0024

County of Jackson

State of Missouri

AFFIDAVIT OF BRETT C. CARTER

Brett C. Carter, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Surrebuttal Testimony of Brett C. Carter;" that said testimony was prepared by him and under his direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge, information, and belief.

Brett C. Carter

Subscribed and sworn to before me this

-2004. day Notary Public

Terry D. Lutes

TERRY D. LUTES Jackson County My Commission Expires August 20, 2004

My Commission expires:

8-20-2004