

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

In the Matter of a Staff Investigation into the)
Customer Service and Billing Recordkeeping) GO-2020-0182
Practices of Spire Missouri, Inc. d/b/a Spire)

SPIRE MISSOURI INC’S RESPONSE TO STAFF’S INVESTIGATION REPORT

COMES NOW Spire Missouri Inc. (“Spire” or “Company”) and, pursuant to the Missouri Public Service Commission’s (“Commission”) November 18, 2020 Order, files this Response, and respectfully stating as follows:

1. On December, 20, 2019, Staff filed a Motion to Open Investigation into the accuracy of the recordkeeping of Spire Missouri, Inc., which operates in two non-contiguous service territories as Spire Missouri East and Spire Missouri West, with respect to customer accounts, as well as the efficiency and reliability of Spire’s recordkeeping methods, applications, and systems.
2. On December 30, 2019, the Commission issued an Order Opening an Investigation.
3. On June 30, 2020, the Commission issued an Order Directing Staff to File a Report giving the Commission’s Staff until October 30, 2020, to file a report showing its findings of the investigation.
4. On October 30, 2020, Staff filed its Investigation Report that was prepared by Staff’s Customer Experience Department.
5. On November 16, 2020, the Commission issued an Order directing Spire to Respond. This order gave Spire until no later than December 18, 2020 to respond to ten specific

recommendations from Staff's Investigation Report and to file a status report every six months thereafter describing its progress in addressing those recommendations.

6. Spire is providing its response to all ten recommendations in its Attachment A to this Response.

7. Spire appreciates Staff's inquiries, recommendations, and analysis. Spire has already acted on several of these recommendations, and looks forward to continuing discussions on these matters.

WHEREFORE, Spire respectfully submits this this Response to Staff's Investigative Report in compliance with the Commission's November 18, 2020 Order.

Respectfully submitted,

/s/Rachel L. Niemeier

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the parties to this case on this 18th day of December 2020, by hand-delivery, fax, electronic mail or by regular mail, postage prepaid.

/s/ Rachel L. Niemeier _____

ATTACHMENT A

GO-2020-0182

SPIRE MISSOURI, INC.'S RESPONSE TO MISSOURI PUBLIC SERVICE COMMISSION STAFF'S INVESTIGATION REPORT

BACKGROUND

On December 20, 2019, Staff filed a motion requesting that the Commission open an investigation into Spire Missouri Inc.'s ("Spire" or "the Company") business operations and practices. Staff conducted a thorough investigation and filed its "Staff Investigation Report" ("Report") ten months later, on October 30, 2020. During the investigation, Spire provided Staff access to information requested by Staff to allow them to evaluate Spire's call center operations, quality assurance and employee training practices, metering operations, and responsiveness to the Commission and Staff. Ultimately, Staff made ten recommendations for Company management to consider.

In its Summary, Staff recognized that Spire has developed and is implementing a number of new programs and initiatives in an attempt to correct some of the issues that have been identified through customer feedback and complaints in recent years. Spire appreciates this recognition that the Company has already implemented improvements, as Spire always seeks to put its customers first and has worked to enhance the customer service experience significantly in recent years.

The Company will address each of Staff's recommendations for Company Management. Spire is committed to continued conversations with Staff regarding items mentioned in the Report and looks forward to implementing the recommendations of Staff and continuing to evolve its practices to ensure the customer is first.

SPIRE'S RESPONSE

RESPONSIVENESS TO THE COMMISSION STAFF

- I. Evaluate present methods of responding to Staff requests for information and determine alternative back-up measures when workload or other factors will delay responses.

For informal complaints, Staff identified that Spire frequently requests extensions to respond to information requests. It is important to highlight that Staff's investigation demonstrated that informal complaints against Spire have steadily declined since fiscal year 2015. A request for an extension allows the Company to ensure we correctly and fairly resolve the complaint, and sometimes that includes coordinating with multiple departments to obtain accurate and complete information that can be included in the response Spire provides to Staff for the informal complaint. As Staff noted, Spire is generally as responsive as other utilities to

requests for information in an informal complaint situation. Spire will continue to respond as accurately and expeditiously as possible.

For formal complaints, Staff noted several additional concerns focused largely on the Company's responsiveness, in general, and Spire's timeliness, completeness, and accuracy of responses to formal data requests (DRs), specifically. Spire acknowledges that delayed responses to DRs and communication with Staff on any complaint is not preferred and has taken steps to mitigate the risk of that situation occurring.

Staff cited two specific cases where Staff filed motions to compel discovery and experienced delayed response time in Case Nos. GC-2020-0057 and GC-2018-0159, both of which were ultimately dismissed. Staff cites the former case as an example of incomplete DR responses and missing call records from June to August 2019. Spire will address the Staff's recommendations on call records in Section III below. The other case was related to failure to timely respond to DRs requiring the need for Staff to file motions to compel.

Spire recognizes the importance of timely responding to DRs and has implemented changes to avoid these types of claims and motions to compel in the future. This includes a DR distribution email list that includes both regulatory and legal representatives. Since the time of those specific cases, Spire has reorganized its staffing structure and has enhanced its regulatory and legal teams. Currently, Spire has three attorneys that work on regulatory matters, including a dedicated general counsel. There is also a new structure in the Regulatory Department, with a new Managing Director over Regulatory and Legislative Affairs who has a background in utilities, is involved in all regulatory matters before the Commission, and who reports directly to the President of the Company. This structure enables consistent and constant communication with Staff and internal oversight on all regulatory matters.

Additionally, the Legal and Regulatory Departments now have combined weekly meetings to discuss regulatory matters, including data requests and responses, filing due dates, status updates of pending cases, and strategy to respond to filings and DRs, including the specific company employees responsible for responding to the DR. This meeting also now includes a review of a dedicated data request matrix, listing the due dates of all DRs submitted in all cases. This meeting allows all individuals on those teams to be aware of and to prioritize the current workload, discuss due dates and provide accountability to cover for busy work schedules and vacations when needed. The teams are always looking at ways to better manage and innovate the process to ensure compliance with all regulations, specifically the DRs. This is an ongoing process that will evaluate the benefits of different types of programs to better track due dates and ensure timely responses.

Staff also states that Spire has shown a pattern in general of having difficulty providing call recording files. This issue will be more fully addressed below in Section III below.

RECORDKEEPING SYSTEMS

II. Require additional training for all call center representatives in the importance and utilization of recording account notes when responding to customer calls.

Spire understands the importance of ensuring that representatives are entering a note on all accounts and that the consistent practice of entering an account interaction is solely the responsibility of the representative answering the call. Spire acknowledges and agrees that additional training for both experienced and new representatives is beneficial. Spire plans to conduct refresher training for all representatives on the process of entering notes and the importance of doing so. Spire's Consumer Experience Team will commit to performing such training quarterly. The Spire Training team will assess all learning opportunities logged in our tracker and identify a new category called "Customer Contact Missing" to further delineate. Spire further commits to conduct special observation sessions that focus specifically on interactions to ensure that representatives understand the importance and utilization of recording account notes when responding to customer calls. As Staff has learned through the course of its investigation, Spire intends to in-source portions of its Customer Experience Department in the coming years, reducing its reliance on third-party call center vendors, if timely recovery of these costs is available. The Company continues to balance the costs and the services it provides to its customers. The Company expects this change to result in less turnover of representatives and potentially higher quality and consistency in noting accounts.

Spire will investigate the potential for requiring notes within the Customer Care and Billing (CCB) software and MyAccount. MyAccount is embedded inside CCB and works seamlessly with it. Additionally, Spire took the opportunity on November 18, 2020, to demonstrate MyAccount to Staff to help Staff gain a better understanding of the system and how it relates to customers calls and recording notes.

III. Review the methods used to store and organize recorded customer calls to determine if improvements could be made to improve the ease of retrieval.

Currently, Spire records all customer calls. The software saves the calls and contains certain information fields which can be searched to locate calls. The most commonly used fields are account number, telephone number utilized by the customer to initiate the call, the representative that assisted the customer, and several others.

At various times, the Company has been unable to locate certain recorded files upon Staff's request. The inability to locate a recording is usually due to the age of calls, unknown

inbound telephone number, or unknown date of interaction. In addition, Spire experienced software issues in 2019 with the “concatenation” of recorded calls, in which the software did not recognize the end of one call and the beginning of a new call, making retrieval of the call recordings difficult. This or other software “bugs” may have contributed to the missing call recordings in formal DR responses. The concatenation software issues have since been resolved.

Spire wishes it could locate each telephone call involved in each and every informal and formal complaint because, as Staff noted in its Report, call recording software provides both quality assurance and training resources, as well as protection for the Company and customers when allegations are made. Spire is diligent in its attempts to locate calls based on the information it is given about the customer. Spire is open to providing a demonstration of the software to demonstrate how calls are reviewed if Staff believes that will be beneficial.

IV. Evaluate if there are alternatives available to record the screens of third-party call center representatives as a part of Spire’s standard quality assurance procedures.

In order to maintain robust cyber security protocols and protect its information technology network, Spire has been unable to record screens of the third-party customer service representatives. This is because a computer must be within the Spire network for the screens to be recorded. We are working closely with our Information Technology team to investigate options to record screens via an alternate network access solution, if possible.

Spire is also working toward balancing the ratio of resources for customer service by insourcing some customer service representative positions. This would increase the number of potential screen recordings since those employees would be operating within our network. Spire would like to further discuss this recommendation with Staff.

BUSINESS OPERATIONS

Call Center Operations.

V. Continue to develop additional methods and procedures to monitor the performance of third-party call center representatives.

Spire agrees that there are challenges to effectively manage a successful third-party team of resources. Spire has taken several actions to address this concern and will continue to do so as recommended by Staff. First, effective in FY20, Spire’s Quality team began conducting monthly meetings with each third-party supervisor to review the monthly quality scores of representatives on their team. Spire has assumed responsibility for training the third-party representatives, rather than relying on trainers on the contractor’s staff. Spire has also assigned Spire managers to third-party supervisors in order to work more closely as a team and provide management and guidance. This year, Spire is lowering the ratio of representatives to supervisors from 18/1 to 10/1. Spire also introduced a new, more conveniently located and easily accessed third-party to create cost effectiveness and quality competition among our contracted partners. Additionally, Spire will continue to evaluate these methods and procedures related to its third-party call center representatives.

VI. Develop enhanced training methods to improve the performance of third-party call center representatives.

In addition to the explanation stated in Section III above, starting in 2019 and until the coronavirus pandemic changed the work environment, Spire trainers were traveling and leading the training at each location. Alorica trainers supplemented the training.

Spire's Quality and Training team is in the process of developing enhanced training methods designed to improve performance of all representatives, including third party representatives. In 2021, the Quality and Training team plans to implement the following:

- o Skill based training (implemented)
- o Updated training documentation
- o Development of a 12-month program with multiple training touch points throughout.

Call Center Resource Utilization

VII. After discussion with Staff, improve the information provided to Staff regarding the staffing and quality performance of call center representatives at each location. This information should be submitted as a part of the monthly reporting to Staff ordered in Case No. GM-2013-0254.

Within 90 days, Spire will discuss with Staff and develop reporting that provides staffing and quality performance of call center representatives at each location.

Metering Operations

VIII. Continue to evaluate the effective utilization of AMR alarms to identify metering problems and take actions to resolve the confusion over the necessary assignment of responsibility for the actions taken in response to the alarms.

Spire is actively working to refine its processes and procedures in coordination with its contractor work force scheduling to improve its response to meter alarms. Additionally, Spire appreciates Staff noting that the meters are anticipated to experience more issues as they continue to age and reach the end of their operational life.

Spire agrees with Staff's recommendation that the Company needs to better integrate its metering, recordkeeping, and billing systems as it goes forward for Spire to realize the full value of automated metering. Spire will continue to find ways to integrate the systems from its two predecessor companies. As Spire informed Staff during the investigation, it is planning a company-wide transition to next generation, fully digital ultrasonic metering with network

infrastructure to support automatic hourly meter readings. This technology will have very significant customer benefits in terms of safety, reliability, and metering accuracy. It will also unlock large new sets of usage data to allow customers to monitor their usage patterns more closely so they can make adjustments to their usage. Beginning in 2021, Spire will begin to more directly monitor alarms to enhance their visibility. This will allow Spire to have access to and a better understand alarms and analyze those alarms and the Company's responses.

During the transition to these new technologies, the Company will work with its contractor to create increased reporting and a better action plan on handling alarms. The current monthly reports and meetings can be supplemented in numerous ways. We will work with our contractors to develop reporting and processes that improve our effectiveness.

BUSINESS PRACTICES

Balance Transfers

- IX. Review the policies regarding the establishing of new service for a customer and develop guidelines relative to the determination and communication of prior balances that may be transferred to this account.

Spire has reviewed the policies regarding transfers of prior balances, as Staff suggested. Spire made several enhancements to the process. When establishing service for a customer, Spire will inform the customer of any unpaid debt connected to their prior addresses. If the customer accepts responsibility of the debt and makes a payment, service is initiated. If the customer does not accept the debt, Spire will make additional investigation and identification efforts to determine if the customer is responsible for the debt or not. If then it is determined the customer is responsible for the debt, they will need to pay before service is turned on, and if the customer is not responsible then service would begin. If the gas is already on (inside meter with no access) at the residence, but the customer has debt from a prior service location, then Spire will transfer the debt to the customer at the new address because the gas is already on. Any prior balances will be transferred to the account later after thorough investigation confirms the propriety of the transfer. For new service, My Account displays the debt, which will assist Spire in this process. Additionally in FY21, when debt transfers with a customer, Spire will be implementing an automated lettering process to inform the customer of the debt transfer.

Dispute Service Agreements

- X. Continue to adhere to the procedures developed regarding Dispute Service Agreements to conduct a weekly review of these accounts and to place further extensions on collections when necessary.

Staff observed customers being disconnected or under threat of disconnection while a complaint was pending before the Commission. Staff noted Spire's actions in September 2019 that addressed this problem through an updated procedure. Spire appreciates Staff's acknowledgement of this updated procedure and its encouragement for Spire to continue to use the Dispute Service Agreements, and to check that these conditions are being adhered to regularly. Spire will continue to use the Dispute Service Agreement procedure and to place further extensions on collections when necessary.

CONCLUSION

Spire appreciates Staff's investigation on these important customer experience matters. It is our goal at Spire to not only provide our customers an essential service as safely and reliably as possible, but to also do so in a manner that shows that we truly value each and every customer. We look forward to working with Staff to continue to improve our processes and to better serve our customers.