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

SURREBUTTAL TESTIMONY

OF

SCOTT J. GLASGOW

CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.

CASE NO. WR-2023-0006

Jefferson City, Missouri
July 2023

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2 **SCOTT J. GLASGOW**

3 **CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.**

4 **CASE NO. WR-2023-0006**

5 Q. Please state your name and business address.

6 A. My name is Scott J. Glasgow, and my business address is 200 Madison Street,
7 Jefferson City, MO 65101.

8 Q. Are you the same Scott J. Glasgow who filed cost of service direct testimony in
9 this rate case on May 26, 2023?

10 A. I am.

11 **EXECUTIVE SUMMARY**

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

13 A. I am responding to the rebuttal testimony of Confluence Rivers Utility Operating
14 Company, Inc.'s ("Confluence") witness Todd Thomas and the Office of the Public Counsel's
15 ("OPC") witness Dr. Geoff Marke concerning customer service and more specifically customer
16 surveys. I will also address the complaint log required by rule 20 CSR 4240-13.040(5)(B).

17 **CUSTOMER OPINION SURVEYS**

18 Q. What was your recommendation regarding customer opinion surveys?

19 A. I recommended that Confluence should examine methods available to solicit the
20 opinions of its customers regarding the service that they are receiving.

21 Q. What was Confluence's response to this recommendation?

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1 A. Mr. Thomas stated, “It is my opinion that customer opinion surveys, within the
2 utility industry, are typically not cost effective.”¹

3 Q. Did he explain why Confluence feels this way?

4 A. Mr. Thomas stated that, “customers that will participate in such surveys
5 generally have a negative opinion of their monopoly utility.”² He continued that, “customers
6 typically resent being limited to a single monopoly provider, being subjected to rate increases
7 over which they feel they have no input; or service plans that don’t meet their specific desires.”³
8 Mr. Thomas reiterated, that because of this, given the lack of benefit to such customer surveys,
9 Confluence Rivers does not believe that they justify the cost.⁴

10 Q. Did Mr. Thomas provide any cost analysis for Confluence’s conclusion?

11 A. No cost analysis was provided.

12 Q. What is your response to this conclusion?

13 A. I do not agree with Mr. Thomas’ conclusion. Confluence should be eliciting
14 feedback due to the reasons he gave for not performing customer surveys. If customers of
15 Confluence had a choice, they could express their feedback by canceling service and getting
16 another provider. Companies that have competition need that feedback or they will lose
17 customers.

18 Customers without a choice in a service provider need to express their feedback in other
19 ways. That is one of the reasons the Commission orders local public hearings (“LPHs”), to
20 provide customers a chance to give feedback on service quality, rates/rate plans, and other

¹ Rebuttal Testimony of Todd Thomas, Page 24, Line 5 through 6.

² Rebuttal Testimony of Todd Thomas, Page 24, Line 6 through 7.

³ Rebuttal Testimony of Todd Thomas, Page 24, Line 9 through 11.

⁴ Rebuttal Testimony of Todd Thomas, Page 24, Line 11 through 12.

1 issues concerning customers. This feedback is helpful to the Commission as it provides a
2 foundation for informed decision-making. Utilities should want that feedback on a day-to-day
3 basis, so they can continuously make improvements and provide quality customer service.

4 Q. Did Mr. Thomas testify that Confluence had any experience performing
5 customer surveys to back up their views about them?

6 A. Yes. Mr. Thomas stated they performed a customer survey in a Louisiana
7 service area in which they sent out 25 emails. Of those 25 emails, only 15 customers opened
8 the email, 6 people responded, and most of the comments concerned the rates charged for water
9 service. He concluded that the result of that survey is consistent with Confluence's views on
10 customer opinion surveys.⁵

11 Q. Do you have a different view of the email survey they performed in Louisiana?

12 A. Besides being a very small sample size for a business to develop an opinion on
13 the future use of customer surveys, the email survey Confluence performed was very successful.
14 Of the 25 customers sent this email survey, 60% opened the email; and the average email survey
15 open rate for all industries is a little over 21%.⁶ Also, the average percentage of people who
16 respond to an email survey is about 6%.⁷ Confluence's email survey achieved a 24% customer
17 response rate, four times the average rate.

18 Finally, Mr. Thomas stated "most" of the customers responded concerning rates, which
19 means that other areas were also discussed. For little more than developing a survey and sending

⁵ Rebuttal Testimony of Todd Thomas, Page 24, Lines 13 through 20 and Page 25, Lines 1 and 2.

⁶ Intuit mailchimp 2019, *Email Marketing Statistics and Benchmarks by Industry*, accessed July 11 2023, <<https://mailchimp.com/resources/email-marketing-benchmarks/>>.

⁷ Lucia Chung 2021, *What is a good survey response rate for online customer surveys?*, Delighted, accessed July 11 2023, <<https://delighted.com/blog/average-survey-response-rate#:~:text=So%2C%20what%20is%20a%20good,rate%20is%2050%25%20or%20higher>>.

1 it through email, Confluence was able to get customer feedback. Staff reiterates that customer
2 feedback is important and is vital for the overall improvements customers deserve.

3 Q. What specifically concerns you about Confluence's response regarding
4 customer surveys?

5 A. There are several concerns, but the biggest is that Confluence does not see the
6 obvious benefit of customer feedback. One other concern is that the only official feedback they
7 are receiving is from LPHs during rate cases or from customers who take the initiative to file
8 complaints.

9 Q, There was customer witness testimony given at the LPHs concerning some
10 billing errors and communication issues. These issues included not being notified of planned
11 outages, boil orders and not having phone calls returned. Was this customer feedback addressed
12 by a Company witness in rebuttal testimony?

13 A. Yes. The President of Confluence, witness, Josiah Cox, stated that for the billing
14 errors, they took the customer's information down and they are working through the individual
15 issues.

16 He added that, "he takes these issues regarding customer communications seriously⁸."
17 Among other things, he stated that changes to their website⁹, the creation of a communications
18 department¹⁰ and notification process changes with Confluence's contract engineering team
19 should show improvement.¹¹

20 Q. Does that message match the testimony filed by Mr. Thomas?

⁸ Rebuttal Testimony of Josiah Cox, Page 12, Lines 1 and 2.

⁹ Rebuttal Testimony of Josiah Cox, Page 12, Lines 12 through 15.

¹⁰ Rebuttal Testimony of Josiah Cox, Page 12, Lines 3 through 6.

¹¹ Rebuttal Testimony of Josiah Cox, Page 12, Line 7 through 9.

1 A. No. On one hand you have the President of Confluence stating he takes
2 feedback provided at LPHs seriously, and on the other hand, the Senior VP whose duties
3 include engaging and overseeing customer service providers¹² and whom the director of
4 customer experience reports to, stating that feedback through surveys lacks benefit and does
5 not justify the cost. It's baffling that Confluence is of the opinion that feedback through
6 surveys lack benefit. It appears that Confluence only takes customer feedback seriously when
7 a customer provides testimony or when a complaint is filed with the Commission.

8 Confluence has agreed with my recommendations to start meeting with Staff on a
9 quarterly basis and to provide additional monthly call center reporting metrics to Staff.
10 These additions should be helpful going forward to improve communications between Staff
11 and Confluence.

12 For its customer's sake, I hope Confluence changes its view about what its customers
13 have to say and as a result improves the communications with its customers.

14 Q. Did OPC agree with your recommendation about Confluence looking into
15 methods to perform customer surveys?

16 A. Yes and no. Although Dr. Geoff Marke agreed with Staff, Dr. Marke testified
17 that Staff did not go far enough with its recommendation. He continued

18 The Company should submit a competitive RFP¹³ for a third-party
19 customer opinion survey throughout each of its systems. The RFP should
20 be based, in part, on feedback given to the Company from Staff and OPC.
21 The selection of the contract will be based on a three-way vote from the
22 Staff, OPC, and the Company. If a majority decision cannot be reached,
23 the results will be presented to the Commission for selection.¹⁴

24 Q. Do you agree with Dr. Marke that your recommendation did not go far enough?

¹² Direct Testimony of Todd Thomas, Page 1, Line 19.

¹³ Request for proposal.

¹⁴ Rebuttal Testimony of Geoff Marke, Page 16, Lines 11 through 15.

1 A. After reading Mr. Thomas' response, yes. Confluence should be required to
2 work with Staff and OPC to submit a competitive RFP for a third party customer survey and
3 this survey should be submitted within one year of rates going into effect. The results of the
4 customer survey should be made public.

5 **COMPLAINT DOCUMENTATION**

6 Q. In your direct testimony, you pointed out that for two rate cases in row,
7 Confluence had not complied with the Commission rule¹⁵ requiring utilities to keep a list of
8 complaints, and you recommended they comply with that Commission rule. Did Mr. Thomas
9 address that recommendation?

10 A. He stated several things, including that Confluence is, "for the most part"¹⁶,
11 following the rule. He stated that I referenced two complaints that were not listed on the log
12 and that clearly improvements can be made in the Company's complaint documentation
13 process.

14 Q. What is your response to those statements?

15 A. It is concerning that Confluence has not complied with Commission rules in two
16 consecutive rate cases, and a Senior VP's response is that they are following the rules "for the
17 most part."

18 To correct my direct testimony, there were 22, not 23, complaints listed on the complaint
19 log Confluence provided from July 2021 through of June 2023 that were in the Electronic Filing
20 Information System ("EFIS"). Although Staff referenced two missing complaints, Confluence

¹⁵ 20 CSR 4240-13.040(5)(B).

¹⁶ Rebuttal Testimony of Todd Thomas, Page 22, Line 11.

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1 was missing 10¹⁷ complaints on its complaint log that were complaints recorded in EFIS. That
2 is over 30% of EFIS complaints concerning Confluence that were not logged by Confluence,
3 as required by Commission rule. Staff is relieved that Mr. Thomas realizes that, “clearly...
4 improvements can be made.”¹⁸”

5 Q. Does this conclude your surrebuttal testimony?

6 A. Yes, it does.

¹⁷ C202200012, C202200536, C202200647, C202200946, C202300198, C202300502, C202300510, C202300738, C202300902, C202300921.

¹⁸ Rebuttal Testimony of Todd Thomas, Page 23, Lines 4 and 5.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Confluence Rivers Utility)
Operating Company, Inc.'s Request for) Case No. WR-2023-0006
Authority to Implement a General Rate)
Increase for Water Service and Sewer)
Service Provided in Missouri Service Areas)

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 *Surrebuttal 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 17th day of July 2023.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070


Notary Public