

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

In the Matter of an Investigation of)
Customer Service Issues at Spire)
Missouri, Inc.)

Case No. GO-2018-0251

STAFF'S FINAL REPORT & RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and, for its *Final Report and Recommendation*, as is explained in more detail in the attached *Final Report*, states that the issues raised in this case have been satisfactorily resolved. Spire has agreed to adjust certain of its practices to reflect Staff's understanding of Commission Rule 4 CSR 240-13.055(3)(B). With this resolution, Staff advises that no further action in this case is necessary and it should therefore be closed.

WHEREFORE, Staff prays that the Commission will accept its *Final Report & Recommendation* and close this case.

Respectfully submitted,

/s/ Kevin A. Thompson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission, on this 10th day of October, 2018.

/s/ Kevin A. Thompson

REPORT OF THE STAFF

TO: Missouri Public Service Commission Official Case File
Case No. GO-2018-0251- In the Matter of an Investigation of Customer
Service Issues at Spire Missouri, Inc.

FROM: Contessa King, Manager, Customer Experience Department

/s/ Natelle Dietrich 10/10/2018
Commission Staff Division

/s/ Kevin Thompson 10/10/2018
Staff Counsel's Office

DATE: October 10, 2018

On March 16, 2018, Staff filed a Motion to Open Investigation¹ into Spire Missouri, Inc.'s (Spire or Company) compliance with various provisions in Chapter 13 Service and Billing Practices for Residential Customers of Electric, Gas, Sewer, and Water Utilities. In its Motion, Staff referenced three informal complaints filed by customers during the 2017-2018 Cold Weather Rule (CWR) period which is November 1 through March 31 annually. Staff attempted to resolve the issues presented in the customers complaints with Spire by letter sent via email on January 5, 2018 and a follow-up letter sent via email on February 6, 2018. Spire's Counsel responded to Staff's January 5, 2018, letter via email addressing some of the issues raised in Staff's letter. Spire's Counsel advised more facts were necessary to respond to some of the issues raised in Staff's letter and Spire's Counsel committed to examine the specifics of the complaints and get back to Staff. Staff's February 6, 2018, letter was sent to the Company and Staff's March 16, 2018, Motion was filed due to the Company's lack of cooperation beginning January 6, 2018, ending March 26, 2018, when Spire filed its Response² to Staff's Motion.

On March 22, 2018, the Commission issued an Order Opening an Investigation³, advising this is only a fact-finding investigation and is not a contested case. The Commission ordered Staff to file a progress report no later than May 31, 2018.

In Staff's Status Report, Staff informed the Commission that "a meeting with Spire has been held and Staff is now waiting for certain information that Spire promised to

¹ GO-2018-0251, Motion to Open Investigation, March 16, 2018

² GO-2018-0251, Spire Missouri Inc.'s Response to Staff's Motion to Open Investigation, March 26, 2018

³ GO-2018-0251, Order Opening an Investigation, March 22, 2018

provide.”⁴ On June 14, 2018, Staff filed a Motion notifying the Commission certain Data Requests (DRs) were overdue and Staff requested the Commission convene a Discovery Conference to take up the issue of enforcing responses to Staff’s DRs.⁵ On June 25, 2018, Staff submitted a filing stating a Discovery Conference is no longer necessary since Spire provided the overdue DR responses⁶.

Staff has reviewed all information provided by Spire regarding the consumer complaints referenced in Staff’s Motion to investigate Spire’s compliance with Commission Rule 4 CSR 240-13, Service and Billing Practices for Residential Customers of Electric, Gas, Sewer and Water Utilities. Spire responded to Staff’s initial DRs on June 15, 2018, and responded to Staff’s follow-up DRs on August 8, 2018. Additionally, Staff and the Company participated in two conference calls, May 18, 2018, and July 13, 2018. Staff focused this investigation on Spire’s service and billing practices for residential customers during the Cold Weather Rule period.

Based on Staff’s analysis of data associated with this investigatory case, information provided in the informal complaints and discussions with the Company, Staff is of the opinion that Spire has adequately responded to concerns raised in Staff’s Motion and Staff’s follow-up DRs. Staff’s understanding of 4 CSR 240-13.055(3)(B)⁷, is that if the Company cannot disconnect service within 96 hours of the notice to the customer, a new 96-hour notice should be provided. Per rule, the 96-hour notice can be written notice sent by first class mail, a door hanger or at least two telephone call attempts to the customer.

To address Staff’s interpretation of the rule, Spire has enhanced its outbound automated call procedures by attempting two (2) telephone calls twenty-four (24) hours preceding discontinuance of service. The two telephone call attempts prior to disconnection comply with notice requirements under 4 CSR 240-13.055(3)(B). Spire explains in its Response to Staff’s Motion “After sending the initial 96 hour notice, Spire will follow up with

⁴ GO-2018-0251, Staff’s Status Report, May 31, 2018

⁵ GO-2018-0251, Staff’s Motion to Schedule Discovery Conference, June 14, 2018

⁶ GO-2018-0251, Staff’s Notice Regarding Its Motion to Schedule Discovery Conference, June 25, 2018

⁷ 4 CSR 240-13.055 Cold Weather Maintenance of Service: Provision of Residential Heat-Related Utility Service During Cold Weather

two phone call attempts in order to extend the 96 hour period.”⁸ Additionally, Spire can now document actual call times by using a separate system.⁹ The Company also committed to providing the Commission’s Consumer Services Department detailed responses to informal complaints, particularly during the CWR period. Verbally, the Company advised that complaint responses will include all attempts to contact the customer prior to discontinuance of service for nonpayment and responses will include the customer’s Cold Weather Rule payment arrangement eligibility and history of prior CWR arrangements when applicable.

This investigation did not reveal actions by Spire that require a formal complaint or additional action at this time. Staff and Spire were able to resolve the issues presented in Staff’s Motion. However, Staff will continue to monitor Spire’s customer service and billing practices for residential customers and if necessary will request appropriate action if concerns arise.

⁸ Page 3, Paragraph 7

⁹ Response to Staff Data Request #9