

**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 PROGRESS REPORT FOR DECEMBER 2021

COMES NOW Spire Missouri Inc. (“Spire” or “Company”) and, pursuant to the Missouri Public Service Commission’s (“Commission”) January 18, 2021 Order, files this Progress Report, and respectfully states 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 October 30, 2020, Staff filed its Investigation Report (“Staff’s Report”) that was prepared by Staff’s Customer Experience Department.
4. On December 18, 2020, Spire filed its Response to Staff’s Report which included an attachment addressing ten specific findings from Staff’s investigation.
5. On January 19, 2021, the Commission issued an Order Establishing Time for Spire to File a Progress Report on or before June 18, 2021 and ordering similar reports each following December and June of subsequent years unless the Commission orders otherwise. This filing complies with that Order.
6. On June 18, 2021, Spire filed a Progress Report in this matter.

7. In addition to these filings, Spire has met with Staff in March and May and July of 2021 to discuss the matters involved in this case and has provided additional status updates on the matters identified by Staff.

8. On December 10, 2021, Staff filed its Review of Spire's Status Reports and Investigation Report which included a summary of actions taken as provided in Spire's June 2021 filing and response to Staff's data requests. Staff recommends Spire hold a bi-annual meeting with Staff to discuss recommendation progress and recommends Spire file a progress report on an annual basis.

9. Spire is including a Progress Report Updated for December 2021 attached as Exhibit A to this filing in compliance with the Commission's Order.

10. Spire has spoken to Staff and both parties agree to the bi-annual meetings and the parties further agree that the annual filing should be made no later than December 18, starting with this filing.

11. Spire appreciates Staff's recommendations and analysis and believes this case has been a good opportunity to demonstrate Spire's focus on customer service, to communicate with Staff on our processes, and to continue to achieve Spire's goal of providing excellent customer service. Spire believes Staff's recommendations have been helpful to Spire and the steps Spire has taken to improve its processes will ultimately benefit our customers. Spire looks forward to continuing those conversations through the bi-annual meetings and annual filing as well as throughout the year as appropriate.

WHEREFORE, Spire respectfully requests that the Commission accept this Progress Report in compliance with the Commission's January 18, 2021 Order, and issue an order establishing an annual filing on or before December 18, and directing Staff and Spire to have bi-

annual meetings to discuss the recommendations included in this case, and any other relief the Commission deems appropriate.

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 17th day of December, 2021, by electronic mail.

/s/ Rachel L. Niemeier



GO-2020-0182

December 2021 Update

Spire appreciates the opportunity to provide a progress report on the implementation of recommendations outlined in GO-2020-0182. Since Spire's June 2021 update, Spire has responded to additional data requests from the Staff in this case. On December 10, 2021, Staff filed its Review of Spire's Status Reports acknowledging that Spire has made progress towards implementation of Staff's recommendations. Staff also recommended that Spire hold bi-annual meetings with Staff to discuss progress and that this report should be filed annually. Spire agrees with Staff's recommendation. The following identifies the actions taken in response to the identified initiatives since the last report. Spire and Staff agree that there will be bi-annual meetings to discuss these recommendations and an annual filing in this case will be no later than December 18 with this being first.

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.

June 2021 Response:

Spire continually looks for ways to better manage and innovate the process to ensure compliance with all regulations, specifically the data requests. This is an ongoing process evaluating benefits of different types of programs to better track due dates. The use of Microsoft Teams has enhanced the discovery process. The Regulatory and Legal teams continue to meet weekly, at minimum. They are in constant communication with each other and other departments throughout the week regarding deadlines and upcoming filings to ensure Spire provides responses to Staff's data requests and Commission orders. Spire teams also continue to communicate with Staff on cases, including virtual and in person meetings.

December 2021 Response:

Spire will continue to look for ways to enhance our processes and will communicate improvements in our bi-annual meetings with Staff, or earlier if appropriate.

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.

June 2021 Response:

Spire has developed refresher training for all representatives on the process of entering notes (customer contacts) and the importance of doing so. Spire's Training Team completed the initial refresher training in March and the first quarterly training will be complete by June 30, 2021.

In addition to developing a training course, the Spire Training team reviewed the Learning Opportunity tracker and created a new category for "Customer Contact Missing." We have communicated this new option to all Connect Center and other Customer Experience employees to ensure instances of missing customer contacts are logged appropriately. In our quality review sessions, the Spire Quality Assurance team reviews the Customer Contact Missing learning opportunities with the representatives. For Alorica representatives, we review these learning opportunities with the coaches.

Finally, Spire developed a report identifying customer contacts entered by representative. The report shows the details of each customer contact and is compared to a Calls Handled report that is reviewed by coaches. This comparison identifies representatives that have a gap in the number of customer contacts entered and the number of calls handled. Monitoring this report over time will allow us to determine if a system change is necessary for making notes required in the Customer Care and Billing (CCB) system.

December 2021 Response:

Our third quarterly refresher training for Customer Contacts was completed in October 2021. We continue to review the Customer Contacts entered and Calls Handled reports to ensure representatives are entering contacts for each customer interaction. The process of comparing Customer Contacts to Calls Handled has been beneficial and has provided opportunities for individual coaching. The regular review of these reports and the quarterly training schedule will continue through 2022, and we will communicate progress in our bi-annual meetings with Staff, or earlier when appropriate.

- 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.

June 2021 Response:

Currently, we use both Verint and SAP Contact Center/Communication Desktop (CDT) to store call recordings. Within Verint, we store recordings for six years, and within SAP, we store the same recorded calls for two years. A live demonstration of the Verint software was completed on April 6, 2021 which illustrated how call recordings are organized and how searches for recordings are conducted. Spire is available to answer any additional questions regarding call recordings.

December 2021 Response:

In its December filing, Staff noted that it was unaware of any present situations involving Spire being unable to provide call recordings to Staff. Spire appreciates Staff's recognition of this improvement. Spire will continue to look for ways to improve our processes and will communicate improvements in our bi-annual meetings with Staff, or earlier when appropriate.

- 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.

June 2021 Response:

In March 2021, a Proof of Concept (POC) was developed for a Virtual Desktop Infrastructure (VDI) solution that would enable us to record screens for our third-party representatives. Testing was completed with internal and third-party representatives and testing proved the concept worked and sound quality was not compromised. In late May 2021, we tested a new circuit setup between Spire and GC Services. This setup also proved successful with recording screens. As of June 18, 2021, we are successfully recording screens for all GC Services representatives using the new circuit setup. This solution is simpler to maintain from a licensing perspective. We are now investigating the same solution for Alorica and will be testing with Sherman, Texas representatives first. The solution does require some changes by our third-party vendor, but we anticipate screen recordings for most Alorica representatives will be available by September 30, 2021.

December 2021 Response:

In our response to DR 67, Spire confirmed that our Information Technology Team had been working with Alorica’s resources to obtain screen recordings. Over the last several weeks, we have continued to work with Alorica’s offshore resources to resolve the issues on their end but have not yet been successful. We are still targeting the end of December 2021; however, if we are unable to meet this deadline, we will continue working until we have recorded screens for Alorica representatives. We will continue to communicate progress in our monthly and bi-annual meetings with Staff, or earlier when appropriate.

Business Operations

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

June 2021 Response:

Starting in Fiscal Year 2020, Spire’s Quality team began conducting monthly meetings with each third-party supervisor to review the monthly quality scores of representatives on their teams. We continue to use this practice for reinforcement of quality standards.

We also assigned Spire managers to manage third-party supervisors in order to work more closely as a team and provide management and guidance.

Over the last several months, Spire has coordinated with our third-party vendors to lower the ratio of supervisors to representatives from 1/18 to 1/10. This change allows supervisors to provide more coaching and supervision to their assigned team members. Our supervisor to representative ratios are currently at the following levels:

Spire internal: 1:8

GC Services: 1:10

Alorica: 1:10

December 2021 Response:

Spire will continue to look for ways to enhance the monitoring and improve the performance of our third-party resources. We will communicate improvements in our monthly and bi-annual meetings with Staff, or earlier if appropriate. Our current supervisor to representative ratios are at the following levels:

Spire internal: 1:10

GC Services: 1:10

Alorica: 1:10

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

June 2021 Response:

Spire's Quality and Training team has developed enhanced training methods designed to improve performance of all representatives, including third-party representatives. Skill-based training has been implemented and allows representatives to learn and practice a complete skill before moving to the next.

The Quality and Training team is also developing a 12-month training program with multiple training touch points throughout the 12-month period. The 12-month program draft is in progress and going through internal review. We plan to roll out this new program by September 30, 2021.

Finally, training documentation updates are in progress and will include new materials through online learning, as well as updates to existing materials. At this time, five courses are being developed for online learning and seven process modules are in progress. Our current status is:

Two of five courses are finalized, three are in progress.

17 process modules are finalized, seven are in progress.

All job aids are being reviewed and updated.

December 2021 Response:

As described in DR 70, Spire is continuously adding to our training methods and techniques. We will continue to develop online courses, refine our training materials, and tweak our training practices to improve rep performance. We will communicate progress and improvements in our bi-annual meetings with Staff, or earlier if appropriate.

- VII. Call Resource Utilization -- 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.

June 2021 Response:

Effective with January 2021 metrics, we began reporting on staffing and quality numbers during our monthly meetings with Staff. Spire will continue to collaborate with the team to present these metrics in the desired format, which may be broken down by location, region, or other categories.

December 2021 Response:

Spire will continue to look for ways to enhance our staffing and quality reporting and will collaborate with Staff on improvements in our monthly and bi-annual meetings.

- VIII. Metering Operations -- 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.

June 2021 Response:

Beginning in October 2020, Spire met regularly with Landis & Gyr, our contractor that monitors the meter reading network for Spire Missouri East. During these meetings we mapped out the metering issues and how they are handled today.

The mapping and data evaluation results will allow Spire to evolve our processes for prioritizing and responding to issues. Moreover, we see this as the beginning stages of an overall program that is building a common set of software and processes for reading meters across all of Spire's regions. These are the first steps of a program that will focus on replacing obsolete metering equipment with next generation metering equipment. As the equipment is replaced, software and process improvements are being built that will leverage the advanced capabilities being deployed in this equipment.

The first stage of this project is focused on standardizing processes across Missouri. On April 15th, 2021, improvements were implemented across multiple software platforms to make the meter documentation, meter reading and meter usage capabilities consistent and common across all of Missouri. Next, we will align the processes and practices so that they are consistent across the state. On June 29, 2021, we will begin implementing the first set of standardized meter reading processes across Missouri and will begin replacing inside meters when we receive Landis & Gyr alarms or when the Meter to Cash department identifies read anomalies or no reads. The integrations will be automated when time allows.

The anomalies identified by reads are being studied to improve the promptness of any anomalies identified from data received from the meter. The results of this study and analysis will be applied to daily reads for all of Missouri once they are loaded in the new data warehouse. These will be studied as use cases and will be an ongoing project that will continue

as use cases are identified and prioritized. Currently, the project team is working to develop new algorithms, based off daily data, for three use cases.

December 2021 Response:

Spire received the first comprehensive list of alarms and pending orders from the Landis and Gyr (L&G) system on December 13, 2021. We are studying this data with the goal of aligning it with data that is already stored in Spire's systems.

Our top priority is to extend the data so that we can use daily reads as billing reads when the exact billing read is not available in our billing system. We anticipate this action will reduce bill estimates and allow us to resolve meter issues in advance of billing cycles. While we are building this extension, we are also identifying opportunities for improvement in our processes for the pending work and alarms from L&G and how we assign issues for investigation and remediation. Spire will continue to provide updates to Staff in our bi-annual meetings, or earlier as appropriate.

Business Practices

- IX. Balance Transfers -- 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

June 2021 Response:

Spire has made several enhancements to the process as described in the response including informing the customer of unpaid debt and taking additional steps to investigate benefit of service. We plan to implement an automated lettering process to inform customers when the debt automatically transfers. The new lettering process will be tested with our print vendor this summer and implemented by September 30, 2021.

December 2021 Response:

As described in DR 75, the automated lettering process has been implemented. Spire will continue to look for ways to improve our processes and will communicate any changes in our bi-annual meetings with Staff, or earlier if appropriate.

- X. Dispute Service Agreements - 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

June 2021 Response:

Beginning in September 2019, a new process was implemented by the Community Services Team to continue to cancel collection and severance activity during the informal and formal complaint processes. The credit review date is changed, and the amount the customer is disputing is placed in a dispute Service Agreement. The account is monitored weekly as a

precaution to ensure the customer is not disconnected. The Community Services Team will continue to follow this process.

December 2021 Response:

Spire believes the procedures developed for its Dispute Service Agreements have been and continue to be effective. The process implemented in 2019 has been successful. We've not had a situation where this has occurred since that process was implemented. Spire will continue to look for ways to improve our processes and will communicate any changes in our bi-annual meetings with Staff, or earlier if appropriate.