

GO-2020-0182

December 2022 Update

Spire appreciates the opportunity to provide a progress report on the implementation of recommendations outlined in GO-2020-0182. Since Spire's December 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 agreed with Staff's recommendation, and the Commission granted its request to file an annual progress report. The following summarizes the updates provided to Staff in the bi-annual meetings that occurred in April 2022 and September 2022, which highlight the actions taken in response to the identified initiatives since the last report. Where applicable, the progress report also provides additional updates of the Company's progress since the September 2022 meeting with Staff.

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.

April 2022 Update:

Spire's Regulatory team has continued to make efforts to improve responsiveness to Staff. The team was expanded, with the addition of two new team members in January 2022, to meet caseload requirements and the assignment of an internal project manager to provide additional assistance. The Regulatory and Legal teams hold a weekly meeting to discuss open cases and outstanding data requests. The Regulatory team has improved in responding timely to data requests and requesting extensions on data response due dates.

September 2022 Update:

As discussed in the April Update, the Regulatory and Legal teams continue to hold weekly meetings to review open cases and hold a second weekly meeting specifically for the Company's rate case. The Regulatory team meets biweekly with Staff to address rate case topics and processes as requested. Spire would note that there have been no communication or responsiveness issues from the Regulatory team since 2020.

December 2022 Update:

The Regulatory and Legal teams continue to meet weekly to review open cases ensuring timely responses are submitted.

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.

April 2022 Update:

Spire continues to hold the quarterly refresher training on recording account notes (Customer Contacts) with the most recent quarterly training completed by all representatives in March 2022. Coaches in the Connect Center continue to review representatives' Customer Contact entries and Calls Handled reports to ensure representatives are keeping detailed records for each customer interaction.

September 2022 Update:

As discussed in the April Update, Spire continues to hold the quarterly refresher training with the most recent quarterly training completed by all representatives in June 2022. All representatives attended additional training on Customer Contacts in July 2022. Coaches in the Connect Center continue to review representatives' Customer Contact entries and Calls Handled reports to ensure representatives are keeping detailed records for each customer interaction. Detailed notation of Customer Contacts has become a standard practice for all representatives and has been permanently incorporated into new hire and on-going training.

December 2022 Update:

Spire continues to hold the quarterly refresher training with the most recent quarterly training to be completed by representatives December 2022. Coaches in the Connect Center continue to review representatives' Customer Contact entries and Calls Handled reports to ensure representatives are keeping detailed records for each customer interaction. Detailed notation of Customer Contacts has become a standard practice for all representatives and has been permanently incorporated into new hire and on-going training.

- 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.

April 2022 Update:

In its December 2021 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.

September 2022 Update:

In its December 2021 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.

December 2022 Update:

In its December 2021 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 is unaware of any situation in 2022 where it was not able to provide call recordings when requested. 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.

April 2022 Update:

Spire continues to work on obtaining screen recordings for the Alorica representatives receiving calls from Spire Missouri customers, as was done for all GC Services representatives.

September 2022 Update:

Spire's Information Technology Team and Alorica's Information Technology Team are working through security barriers to implement screen recordings. In the September Update, Spire estimated that this would be completed within 60 days.

December 2022 Update:

Spire's third-party partner GC Services has had screen recordings since 2021. Spire's Information Technology team continues to work with our other third-party, Alorica, and their Information Technology team. Progress has been made to date, but Alorica has not been able to resolve the security barrier (network/firewall) issues on their side. We will continue to support and work with them to resolve their security issue and will keep Staff updated in our monthly meetings.

Business Operations

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

April 2022 Update:

Spire is continuing to see improvement with the performance of its third-party resources. Spire meets monthly with third-party representative to review quality scores and discuss ways the representative can improve. Additionally, Spire is focusing on developing the knowledge of third-party supervisors and coaches so they are better resources for their teams. Advanced Process Training is held every other week with the third-party supervisors and coaches to discuss more challenging topics, such as billing questions, and other items from Spire's weekly Rep Connect. Internal Managers and Coaches travel monthly to Knoxville, Tennessee to observe representatives, supervisors, and coaches in real-time, provide immediate feedback, and meet with leadership.

September 2022 Update:

In addition to the monthly meetings to evaluate quality of third-party resources and providing Advanced Process Training discussed in the April Update, Spire is conducting bi-monthly visits to provide in-person support and training for third-party supervisors and coaches.

December 2022 Update:

The following are the measures that Spire has implemented to ensure quality performance of third-party reps:

- Monthly supervisor meetings to review representative quality scores and create action plans for areas of improvement. This meeting is in addition to monthly agent quality assurance (QA) meetings between our QA team and individual representatives.
- Monthly supervisor meetings to review key performance indicators and create action plans for areas of improvement.
- Bi-monthly onsite visits to GC Services by the Third-Party Specialist and Customer Experience Managers and Coaches.
- Bi-weekly touch base calls to review third-party representatives on performance improvement plans.
- Weekly supervisor meetings between Customer Experience Managers and/or Team Partners to address weekly issues or questions
- On an ad hoc basis, Spire conducts floor meetings (Rep Connect) with training and process updates that include third-party representatives.

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

April 2022 Update:

In March 2022, Spire held a workshop to discuss changes to our call center new hire training. Before the workshop, input was solicited from internal and third-party coaches and representatives. Based on their feedback and workshop discussions, Spire is now piloting an 8-week new hire training curriculum in place of the current 5-week program. This new training gives representatives more time to practice taking calls in a nesting environment, immediately incorporating feedback from coaches and representatives. Spire plans to debrief participants in the pilot in May 2022 and incorporate further changes for the next internal Missouri class. Discussion and planning for introducing the training into third-party classes is ongoing. Finally, Spire is evaluating on how to roll out the 12-month program, however, the 8-week pilot has incorporated training planned for the 12-month program.

September 2022 Update:

Spire has continued to enhance its training methods, particularly in expanding the 8-week new hire training program and implementing it internally for all new hires. Spire would note that early results from the 8-week have addressed issues from the previous 5-week program, and the Company does not believe that a 12-month program is necessary. Spire plans to make the extended 8-week training standard for all internal and third-party representatives.

December 2022 Update:

Spire will be implementing the 8-week training with third-party reps by Spring/Summer of 2023 and will update Staff on its progress in the next bi-annual meeting.

- 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.

April 2022 Update:

As reported in its June and December 2021 filings, Spire began reporting on staffing and quality numbers during monthly meetings with Staff. 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

September 2022 Update:

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.

December 2022 Update:

Staffing and quality reporting has improved since the original case. Spire continues to submit this information monthly, as requested. Spire communicates regularly with Staff on our staffing and quality reporting and will collaborate with Staff on any additional 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.

April 2022 Update:

As the Landis and Gyr (“L&G”) network will no longer be supported after April 2025, Spire has been meeting with L&G to assume responsibility of certain tasks previously handled by L&G representatives. Spire initiated a process for L&G to send a file of events that are reported on the network and need to be addressed. Spire built a data analysis view of this file to better understand the issues that are occurring and increasingly dictate what actions are taken. Where reasonable, Spire employees will start performing the work, such as ultrasonic replacements by Spire employees in lieu of a module repair by a contractor when a meter is more than 10 years old and not providing a read. If a meter is inside and an appointment is needed, it is also being scheduled to a Spire technician instead of a contractor so that the most customer facing work is done by a Spire employee instead of a contractor. This has addressed customer concerns regarding the validity of contractors showing up to perform work on behalf of Spire, especially work requiring entry to the customers residence. Finally, having Spire employees respond to events directly has addressed redundancies where a contractor and a Company employee would both respond to an event. This includes when a contractor responds to a triggered tamper alarm on the L&G network caused by Spire employees performing work on meters.

As of the April Update, Spire has installed 50,000 ultrasonic meters in Spire Missouri East. Spire is focused on replacing inside meters to remove aging equipment and replace with ultrasonic meters with enhanced safety features.

September 2022 Update:

Spire has met several times with L&G leadership to plan the transition of the maintenance of network modules to Spire. Spire and L&G are also working to transition the planning and priority of addressing events reported on the L&G network to Spire, so that Spire may direct activities response to such events. This is part of finalizing the strategy for replacing the L&G system by April 2025. In addition, Spire provided the following updates:

- Spire is currently reviewing all events reported on the L&G network on a bi-weekly basis and assigning work back to L&G or assigning to Spire technicians. The Company is continuing to refine this process.
- Spire is targeting inside meters for replacement by Spire Technicians when they are at customer locations to address failing or alarming AMR devices. Inside meters eligible for testing (> 10 Years old) are being scheduled for replacement at the time a 3-year leak and corrosion inspection is due (ACI Inspection).
- There are now 89,065 ultrasonic meters installed in Spire Missouri East. Spire expects to perform 6,000 and 10,000 replacements a month.
- Spire will begin deploying a communications device on Large Meters across all of Spire Missouri in January 2023. This device uses LTE-M cellular technology that reports hourly readings, once a day. This device will replace the L&G AMR's on these meters (>800 CFH).

December 2022 Update:

Spire has continued to work with L&G on transitioning responsibilities from L&G to the Company as the L&G system will be replaced by April 2025. There are now 96,192 ultrasonic meters installed in Spire Missouri East. The Company will provide further update on the transition progress at the next bi-annual meeting with Staff.

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

April 2022 Update:

Since implementing the automated lettering process for informing customers when debt automatically transfers, Spire has sent more than 5,000 letters.

September 2022 Update:

Spire provided no further update as the automated lettering process continues to be utilized and effective.

December 2022 Update:

Spire has no further update as the automated lettering process continues to be utilized and effective.

- 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

April 2022 Update:

The procedures developed for the Dispute Service Agreements continue to be effective. The process implemented in 2019 has been successful, and Spire has not had any issues since implementation.

September 2022 Update:

Spire provided no further update as the procedures for the Dispute Service Agreements continue to be effective, and Spire has not had any issues since implementation.

December 2022 Update:

Spire has no further update as the procedures for the Dispute Service Agreements continue to be effective, and Spire has not had any issues since implementation.