

Exhibit No.:
Issue(s): *Quality of Service*
Witness: *Dana R. Parish*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal Testimony*
Case No.: *WA-2019-0299*
Date Testimony Prepared: *September 23, 2019*

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

CUSTOMER EXPERIENCE DEPARTMENT

SURREBUTTAL TESTIMONY

OF

DANA R. PARISH

CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.

CASE NO. WA-2019-0299

Jefferson City, Missouri
September, 2019

1 **SURREBUTTAL TESTIMONY**
2 **OF**
3 **DANA R. PARISH**
4 **CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.**
5 **CASE NO. WA-2019-0299**
6

7 Q. Please state your name and business address.

8 A. Dana Parish, P.O. Box 360, Jefferson City, Missouri, 65102.

9 Q. By whom are you employed and in what capacity?

10 A. I am a Utility Policy Analyst I in the Customer Experience Department of the
11 Missouri Public Service Commission.

12 Q. Are you the same Dana Parish that sponsored the Customer Notice/Customer
13 Service section in the Staff Memorandum (“Staff Memo”) filed May 31, 2019?

14 A. Yes.

15 Q. Have you previously filed testimony before the Commission?

16 A. Yes. A copy of my work and educational experience is attached as Schedule DP-1
17 to this testimony.

18 Q. What is the purpose of your testimony?

19 A. The purpose of my testimony is to address Lake Perry Lot Owners Association
20 (“LPLOA”) witness Glen Justis’ rebuttal testimony, filed August 23, 2019. I also detail the
21 number of public comments filed in this case.

22 Q. Please describe the issue Mr. Justis has with the acquisition of Port Perry Service
23 Company (“Port Perry”) by Confluence Rivers Utility Operating Company, Inc.
24 (“Confluence”).

25 A. On page 11, lines 5 through 7, of Mr. Justis’ testimony, he states: “...Lake Perry is
26 highly concerned with loss of local control, potential customer service degradation, and
27 potentially egregious rate increases if Confluence is allowed to acquire PPSC’s assets.”

28 Q. What portion of Mr. Justis’ statement would you like to address?

29 A. I will address Mr. Justis’ concern regarding customer service degradation, focusing
30 on customer service practices to which Commission regulated utilities are required to abide.

1 Q. Is Port Perry currently a utility regulated by the Commission and are there
2 protections in place for customers of regulated utilities?

3 A. Yes. Chapter 13 “Service and Billing Practices for Residential Customers of
4 Electric, Gas, Sewer, and Water Utilities” is in place to protect customers and provide
5 customer service guidelines for companies. Commission Rule 20 CSR 4240-13.010 (1)
6 “...applies to residential utility service provided by all electric, gas, sewer, and water public
7 utilities, which are subject to the jurisdiction of the Public Service Commission under the
8 laws of the state.” 2) “A utility shall not discriminate against a customer or applicant for
9 service, for exercising any right granted by this chapter” and 3) “A utility shall adopt rules
10 governing its relations with customers and applicants for service which are consistent with
11 this chapter.”

12 Q. Would these same protections apply to customers of Confluence?

13 A. Yes.

14 Q. What customer service process and procedures does Confluence have in place at the
15 other systems it operates in accordance with Chapter 13?

16 A. Staff submitted data requests (“DRs”) to Confluence and met with Confluence
17 representatives in St. Ann, Missouri on April 3, 2019. DRs 1 through 11 pertain to customer
18 service quality. According to Confluence’s responses, personnel are available during regular
19 business hours to address customer concerns, Monday through Friday, 8 a.m. to 5 p.m. and
20 an emergency toll free number is available 24/7. Customers may pay their bills by check,
21 debit or credit card, e-check, money order or cashier’s check. A customer brochure is
22 provided to customers detailing information such as company contact information, hours of
23 service and summarization of the customer’s rights and responsibilities. Confluence keeps
24 records of complaints received in its customer service and billing software, and of follow up
25 work orders to maintenance software.

26 Q. Would these same protections apply to Lake Perry customers if owned by a non-
27 regulated company?

28 A. No. Commission rules do not apply to non-regulated companies.

29 Q. Were public comments filed in the Commission’s Electronic Filing and Information
30 System (EFIS)? And if so, can you please briefly summarize?

Surrebuttal Testimony of
Dana R. Parish

1 A. Yes, public comments were filed in this case, as well as case numbers
2 SA-2019-0300 and WM-2018-0116. As of September 16, 2019, 74 comments were filed in
3 EFIS; some of which were duplicate entries. A majority of the comments filed expressed
4 concerns of Confluence purchasing the Company.

5 Q. Were there any additional comments filed in the case?

6 A. Yes. Multiple petitions with roughly 270 signatures were submitted at the
7 September 10, 2019, Local Public Hearing (“LPH”) held in Perryville, Missouri These
8 petitions were filed in EFIS as public comments. This number includes duplicate entries.
9 The petitions were filed in opposition of Confluence acquiring Port Perry.

10 Q. Does this conclude your testimony?

11 A. Yes.

12

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc. to Acquire Certain Water and)
Sewer Assets and for a Certificate of)
Convenience and Necessity

Case No. WA-2019-0299

AFFIDAVIT OF DANA R. PARISH

STATE OF MISSOURI)
)
COUNTY OF COLE)
) ss.

COMES NOW DANA R. PARISH and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

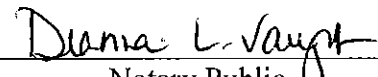


DANA R. PARISH

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 12th day of September, 2019.

<p style="text-align:center">DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2023 Commission Number: 15207377</p>
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Notary Public

Dana Parish

Educational Background and Work Experience:

I am a Utility Policy Analyst I, in the Customer Experience Department, Commission Staff Division of the Missouri Public Service Commission. I have been employed by the Missouri Public Service Commission since January 2000.

I have a Bachelor of Arts degree in Business Management. While at the Commission I have worked in the Utility Services Department, Telecommunications Department, and the Customer Experience Department; as well as for Commissioner Sheila Lumpe and Chairman Robert M. Clayton III. Prior to joining the Commission, I was employed as a Business Tax Specialist with the Missouri Department of Revenue.

Case Summary:

Presented analysis on the following cases and proceedings:

- TO-2013-0416 and TO-2015-0032, Reduction of the Relay Missouri Surcharge
- CC Docket Nos. 96-45/WC Docket No. 10-90, Annual Certification of Support for Eligible Telecommunications Carriers Pursuant to 47 C.F.R. 54.314, 2009-2012
- TW-2012-0012 and TO-2012-0364, Staff's Investigation into the Practices and Procedures of Companies Offering Low Income (Lifeline) or Disabled Universal Service Fund Discounts in the State of Missouri
- CO-2010-0054, Staff Recommendation Regarding DPI Teleconnect's Application for ETC Status on a Wireless Basis
- CO-2012-0043, Staff Recommendation Regarding Budget PrePay, Inc.'s Application for ETC Status on a Wireless Basis
- CO-2012-0282, Staff Recommendation Regarding Fidelity 1 Inc.'s Application to Amend and Expand Designation as an Eligible Telecommunications Carrier

- LA-2013-0482, Staff Recommendation for Approval of Certificate and/or Initial Tariff
- RA-2011-0298, Staff Recommendation Regarding Assurance Home Phone Service, Inc. d/b/a Surety Wireless' Application for ETC Status on a Wireless Basis
- RA-2011-0299, Staff Recommendation Regarding Global Connection, Inc. of America's Application for ETC Status on a Wireless Basis
- RA-2011-0349, Staff Recommendation Regarding Aegis Telecom, Inc.'s Application for ETC Status on a Wireless Basis
- RA-2011-0376, Staff Recommendation Regarding YourTel America Inc.'s Application to Expand Wireless Lifeline Service
- RA-2011-0384, Staff Recommendation Regarding Assist Wireless, LLC's Application for ETC Status on a Wireless Basis
- RA-2012-0076, Staff Recommendation Regarding Cintex Wireless, LLC's Application for ETC Status on a Wireless Basis
- RA-2012-0264, Staff Recommendation Regarding Assurance Wireless brought to you by Virgin Mobile's Application for ETC Status on a Wireless Basis
- RA-2013-0115, Staff Recommendation to Grant ETC Status to Boomerang Wireless, LLC d/b/a enTouch Wireless
- RA-2014-0225, Staff Recommendation to Grant ETC Status to American Broadband and Telecommunications Company d/b/a American Assistance
- WM-2018-0116 and SM-2018-0117, Staff Recommends Approval of Transfer of Assets, Transfer of Certificates of Convenience and Necessity, and Issuance of Certificate of Convenience and Necessity, Confluence Rivers Utility Operating Company, Inc.
- TA-2010-0146, Staff Recommendation Regarding Budget PrePay Inc.'s Application for ETC Status
- TA-2010-0229, Staff Recommendation Regarding Cricket Communications, Inc. Application for ETC Status
- TA-2011-0164, Staff Recommendation Regarding Easy Telephone Service Company d/b/a Easy Wireless' Application for ETC Status on a Wireless Basis
- TA-2011-0377, Staff Recommendation Regarding i-wireless, LLC's Application for ETC Status on a Wireless Basis
- TA-2012-0128, Staff Recommendation Regarding Chariton Valley Telecom Corporation's Application for ETC Status
- TA-2013-0272, Staff Recommendation Regarding Blue Jay Wireless, LLC's Application for ETC Status on a Wireless Basis

- TA-2014-0236, Staff Recommendation for Approval of Certificate and/or Initial Tariff of Flowroute LLC
- TA-2014-0345, Staff Recommendation for Approval of Certificate and/or Initial Tariff of BCN Telecom, Inc.
- TO-2011-0073, Statutory Requirement to Determine Statewide Average Rate
- TO-2015-0032, Reduction of Relay Missouri Surcharge
- TO-2017-0168, Reduction of Relay Missouri Surcharge
- XO-2011-0062, Staff Recommendation Regarding Telrite Corporation's Application for ETC Status on a Wireless Basis
- GR-2018-0013, Rebuttal Testimony, Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utility
- WR-2018-0170, Surrebuttal Testimony, Liberty Utilities (Missouri Water), LLC
- WR-2018-0356, Unanimous Disposition Agreement, Branson Cedars Resort Utility Company