

*Exhibit No.:*  
*Issue:* *Quality of Service*  
*Witness:* *Dana Parish*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Surrebuttal Testimony*  
*Case No.:* *WR-2018-0170*  
*Date Testimony Prepared:* *August 3, 2018*

**MISSOURI PUBLIC SERVICE COMMISSION**

**COMMISSION STAFF DIVISION**

**CUSTOMER EXPERIENCE**

**SURREBUTTAL TESTIMONY**

**OF**

**DANA PARISH**

**LIBERTY UTILITIES (MISSOURI WATER), LLC  
d/b/a LIBERTY UTILITIES**

**CASE NO. WR-2018-0170**

*Jefferson City, Missouri  
August 2018*



Surrebuttal Testimony of  
Dana Parish

1 Q. Please describe the concern regarding customer notices.

2 A. Liberty customers testified that they are not receiving important Company  
3 notices. Examples include notices of boil advisories and notice of Local Public Hearings.

4 Q. Did the Company respond to these statements during the Question and  
5 Answer session?

6 A. On the day of the hearing, the Company stated that roughly 85 (eighty-five)  
7 Local Public Hearing notices were returned for insufficient addresses.

8 Q. Is Staff following up on the return of Local Public Hearing notices?

9 A. Yes. On July 26, 2018, Staff sent data requests to investigate if the Company  
10 provided notice of hearing, as ordered in Commission Order Setting Local Public Hearings.<sup>1</sup>

11 Q. Did the Company address customers not receiving boil order notices, as  
12 mentioned in customer testimony?

13 A. Somewhat. Company personnel asked the customer testifying what she felt  
14 may be the best way to get the notice out to customers. Staff requested that Liberty  
15 specifically identify their procedures for notifying customers at each water system, and  
16 differences among systems.

17 Q. How did the customer respond?

18 A. The Customer suggested posting notices on each of the condominium  
19 buildings.

20 Q. Please describe the concern expressed at the Local Public Hearing regarding  
21 customer call center issues.

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<sup>1</sup> Liberty Utilities (Missouri Water), LLC d/b/a Liberty Utilities, Case No. WR-2018-0170, *In the Matter of the Application of Rate Increase Request for Liberty Utilities (Missouri Water), LLC d/b/a Liberty Utilities*, Order Setting Local Public Hearings, July 10, 2018, page 2, item 3.

Surrebuttal Testimony of  
Dana Parish

1           A.     Customers testified that it is difficult to reach a live person when calling the  
2 customer service number. Some calls would reach no one; while other calls reached a live  
3 person and then the customer was passed on to other Company personnel's voicemail. Some  
4 customers described frustration after being transferred multiple times. A condominium  
5 Property Manager noted that her 200 (+) condominium owners would contact her because the  
6 owners felt it was easier than reaching the Company.

7           Staff is unclear whether the trouble reaching Company personnel via the customer  
8 service phone number was during or after regular business hours.

9           Q.     How did Liberty representatives respond at the Local Public Hearing to  
10 customer concerns?

11          A.     The Company responded that customers could be using old contact numbers.

12          Q.     Has Staff recently discussed call center and customer service issues with  
13 the Company?

14          A.     Yes. During Staff's investigation, Staff identified a number of issues with the  
15 Company's customer service, including call center issues. This issue was previously  
16 addressed in Staff's Partial Disposition Agreement signed by Staff, the Company and OPC,  
17 and filed in this case on May 24, 2018.

18          Q.     What specifically did the Company agree to do in the Partial Disposition  
19 Agreement regarding the customer service phone number?

20          A.     The Company agreed in the Partial Disposition Agreement that:

21                         (2) Within thirty (30) days of the effective date of an order  
22 approving this Partial Disposition Agreement, the Company agrees to  
23 implement the recommendations contained in the Customer Experience  
24 Department Report, attached hereto as Attachment B and incorporated by  
25 reference herein, and provide proof of implementing the recommendations

1 to the Manager of the Commission’s Customer Experience Department and  
2 to OPC:

3 (a) The Company’s call center representatives will include the  
4 Company name “Liberty Utilities” in the opening response to after-hours  
5 telephone calls;

6 (b) The Company agrees to ensure the accuracy of information  
7 presented on all Company billing statements.

8 (c) The Company agrees to use the four (4) credit criteria provided  
9 in Commission Rule 4 CSR 240-13.030(C) when determining whether it  
10 may collect a deposit from new customers.

11 (d) The Company agrees to comply with Commission Rule 4 CSR  
12 240-13.040.

13 (e) The Company agrees to review and update the information  
14 presented in the Company rights and responsibilities brochure and website  
15 to eliminate all inaccurate statements and ensure that this information is  
16 consistent with Company practices and Commission rules. (A link to the  
17 Company’s tariffs must be provided.)

18 In particular, in paragraph (2)(b) Liberty agreed to ensure the accuracy of the information  
19 presented on all Company billing statements. Staff expects this to include any contact  
20 information for Liberty, including telephone numbers.

21 Staff followed up with a data request on July 26, 2018, to obtain more information on  
22 this issue.

23 Q. Does Staff have additional recommendations at this time?

24 A. Staff is still investigating the issues raised by customers at the Local Public  
25 Hearing in Branson on July 23, 2018, and may make further recommendations after the most  
26 recent data request responses are received.

27 Q. Does this conclude your surrebuttal testimony?

28 A. Yes.



## **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

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- 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



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- 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