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Data Center

Missouri Public
Service Commission

Exhibit No.:

Issues:

Customer Service

Customer Billing

Payment Remittance

New Customer Information System

Customer Comment Cards

Checklist

Witness:

J. Kay Niemeier

Sponsoring Party:

MoPSC Staff

Type of Exhibit:

Rebuttal Testimony

Case No.:

WR-2011-0337

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January 19, 2012

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION

UTILITY SERVICES

REBUTTAL TESTIMONY

OF

J. KAY NIEMEIER

MISSOURI-AMERICAN WATER COMPANY

CASE NO. WR-2011-0337

Staff Exhibit No. 15
Date 2-21-12 Reporter JL
File No. WR-2011-0337

Jefferson City, Missouri

January 2012

**TABLE OF CONTENTS OF
REBUTTAL TESTIMONY OF
J. KAY NIEMEIER**

**MISSOURI-AMERICAN WATER COMPANY
CASE NO. WR 2011-0337**

1
2
3
4
5
6
7
8
9
10
11
12
13
14

EXECUTIVE SUMMARY 1
CUSTOMER SERVICE ISSUES 2
CUSTOMER BILLING ISSUES..... 11
PAYMENT REMITTANCE PROCESS 14
NEW CUSTOMER INFORMATION SYSTEM 15
CUSTOMER COMMENT CARDS 16
CHECKLIST FOR ACQUISITIONED WATER AND SEWER COMPANIES 17
RECOMMENDATIONS 18

1 to MAWC. My testimony will also address the Company's new customer information
2 system (CIS), some of the customer comment cards that have been received, the
3 information and/or testimony provided by customers at the local public hearings and the
4 Company's "Checklist" for acquisitioned water and sewer companies. Additionally, my
5 testimony will recommend to the Commission that Staff initiate a program to regularly
6 meet with Company personnel so that both parties can address the Company's customer
7 service, billing and payment remittance issues that are ongoing or were revealed as part
8 of Staff's investigation. The meetings would also be used with the intent to identify and
9 resolve any other matters either party deems necessary.

10 **CUSTOMER SERVICE ISSUES**

11 Q. Does Staff have any concerns with the Company's customer service?

12 A. Yes. Staff has a number of concerns with the customer service provided
13 by the Company.

14 Q. What specific concerns does Staff have regarding the Company's
15 customer service?

16 A. Staff's concerns include the lack of promised responses to customer
17 contacts to the Company and what appears to be incorrect or inconsistent information
18 provided to customers contacting the call centers located in Alton, Illinois and Pensacola,
19 Florida. Staff is aware that the Company's customer service representatives (CSR)
20 respond to customers located in twenty states and are required to be knowledgeable of the
21 various states' tariffs and the various Commissions' rules in order to respond to customer
22 inquiries.

23 Q. What is the purpose of a utility call center?

1 A. In general, utility call centers perform a critical function in that they often
2 serve as the primary means for customers to contact their utilities. Customers require
3 contact with their utilities regarding a wide range of issues including: reporting
4 emergencies and service outages; initiating, discontinuing, transferring or restoring
5 service; inquiring about their bills; discussing delinquent accounts; and making payment
6 arrangements. Over time, utilities and their customers have developed greater
7 dependence upon call centers as utilities have either closed their local business offices
8 or redirected calls that at one time were answered by such offices.

9 Call centers may function in a variety of ways with varying degrees of
10 performance. Some of the factors that contribute to a call center's success include: the
11 sophistication of a company's CIS; the call centers' recruitment, selection and hiring
12 processes; the thoroughness of the training of the customer service center representatives;
13 the number of experienced staff and sufficient staffing levels; and the continual
14 monitoring and reviewing of call handling. The training of customer service center
15 representatives is particularly important because these employees should be prepared to
16 answer a variety of customer questions regarding company policies and procedures,
17 including questions concerning the Company's tariffs and the Commission's rules, in
18 MAWC's case for twenty states. The recruitment, training and retention of a quality
19 workforce that must address a multitude of customer calls and correctly document
20 customer information are critical responsibilities within the utility call center function.

21 The utilities' call center performance is dependent upon having sufficient
22 numbers of well-trained staff to correctly and appropriately answer customer calls within
23 reasonable time periods. Even with advanced technologies such as Integrated Voice

1 Response (IVR) offerings, which provides menu options that may eliminate the need to
2 speak directly to a customer service center representative, customers still have a need to
3 speak directly to utility representatives. Utility customers, through rates, pay for the
4 staffing, as well as, the technology, management, training and space required to operate a
5 utility call center.

6 Q. What is the number of employees at the Company's call centers in Alton,
7 IL and Pensacola, FL?

8 A. The Company's response to Staff's Data Request No. 70 stated that its
9 average number of full-time and part-time customer service representatives for its Alton
10 call center was 400 in 2009, 360 in 2010 and 358 in January through June 2011. The
11 response also stated that its average number of full-time and part-time customer service
12 representatives for its Pensacola call center was 278 in 2009, 264 in 2010 and 241 in
13 January through June 2011.

14 Q. Discuss the number of employees at the Company's call centers.

15 A. Staff notes that from January 2009 through June 2011, there was a
16 decrease of 42 in the average number of employees at the Alton call center and a decrease
17 of 37 in the average number of employees at the Pensacola call center, making a total
18 decrease of 79 in the average number of employees responding to Missouri customer
19 contacts.

20 Staff is concerned that the number of employees at the Company's call
21 centers demonstrates a decreasing trend while it appears the Company is continuing to
22 grow through acquisitions. Additionally, Staff would expect the number of customer
23 contacts to the Company's call centers to increase, at least initially, after the Company

1 acquires a new water or sewer facility due to a different mailing address for customer
2 billing, a different billing statement format, a different billing cycle and other matters
3 concerning the customers' accounts. It is possible that following an acquisition, that the
4 transition may strain existing resources such as call center staff due to the introduction of
5 new tariffs, a new customer base, and other issues.

6 Q. What was the Company's call center call volume for Missouri customers
7 for January 2009 through June 2011?

8 A. The Company's monthly average for 2009 was 27,623 calls, for 2010 was
9 36,277 calls and for January through June 2011 was 33,211 calls. Staff calculated these
10 monthly averages using nine months of information for 2010, because the Company's
11 data for January, February and March 2010 was not available and only six months of data
12 was used to calculate this average for 2011. Staff calculated the Company's yearly
13 average by dividing the total number of yearly calls by the number of months that
14 Company provided the information. Staff notes that the Company's volume of Missouri
15 calls has increased since 2009.

16 Q. Please address Staff's concern with the Company's lack of responses to
17 customer contacts with the Company, which is primarily through the use of its two call
18 centers.

19 A. The Company does not maintain local business offices in the locations that
20 it serves in Missouri. In order to contact the Company, customers have three primary
21 methods to initiate an inquiry and for the Company to provide information or resolution
22 to an issue. A customer may call the Company's call centers, use the Company's website
23 (including email) or write the Company a letter. The Company's customer service

1 representatives in its call centers and/or employees responsible for follow-up to customer
2 contacts are responsible for resolution of customer contacts; however, in some cases, this
3 appears not to be occurring.

4 Q. Please explain why Staff has determined that customers are not obtaining
5 a resolution to their inquiries.

6 A. Throughout its review, Staff has been informed by numerous customers
7 that they are dissatisfied with the Company because they did not receive a response to a
8 letter sent to the Company or did not receive a promised response following a contact to
9 the Company's call center.

10 Specific examples of this dissatisfaction include one customer who
11 testified at the local public hearing held Monday, January 9, 2012, at the St. Louis
12 County Library that he had written a letter to two different employees of the Company
13 and did not receive a response to either letter. This customer further testified that he
14 received resolution to his billing issue only after he contacted a television station and it
15 became involved in the matter. Unable to get a response from the Company and unable
16 to access the required information to resolve his issue alone, the customer then contacted
17 a local television station. After the television station got involved, the customer's issue
18 was resolved by the Company. Had such contact with the television station not been
19 made, it appears that the Company would have continued failing to respond to the
20 customer's letter.

21 At the local public hearing held Monday, January 9, 2012, at University of
22 Missouri St. Louis, North Campus, a customer testified that when he contacted the call
23 center, a customer service representative stated that a supervisor would call him to

1 discuss his issue. The customer testified that he received no phone call from the
2 supervisor.

3 Q. What specific examples does Staff have regarding inaccurate information
4 being provided to customers contacting the Company's call centers?

5 A. Staff, throughout its review, was informed by customers that they had
6 been provided inaccurate information by the customer service center representatives.
7 Some such information is provided in this testimony as examples, but does not
8 encompass the entire issue of inaccurate information being provided to the customers. At
9 least two customers stated they had been informed that they could not receive a credit for
10 a leak issue unless the leak consisted of two times the amount of the bill. Staff is
11 uncertain of the accuracy of this statement and has requested documentation from the
12 Company of its leak adjustment procedures, but has not yet received the information.
13 Numerous customers stated they had contacted the call center and were not provided an
14 explanation or procedure on how or why estimated bills occur. At least two customers
15 stated that customer service center representatives had stated the Company is allowed to
16 estimate, but would not offer reasons or circumstances in which estimation is allowed.

17 One customer informed Staff that when she contacted the call center
18 requesting the explanation of a charge on her bill that does not normally appear on her
19 bill, the call center representative was not able to accurately answer the customer's
20 inquiry. This inaccurate information created confusion on the customer's part and
21 uncertainty as to the status of her account.

22 At the local public hearing held Monday, January 9, 2012, at the St. Louis
23 County Library, a customer testified that when she contacted the call center to discuss her

1 ISRS (Infrastructure System Replacement Surcharge) charge, she was told it was based
2 upon consumption. She was later told by a Company employee that the ISRS charge is
3 not based upon consumption. Staff notes that a definition and explanation of the ISRS
4 fee is located on the Company's website, but the explanation does not include the
5 calculation formula. At the very minimum, a customer service representative could have
6 informed the customer that the ISRS information was available on the Company's
7 website.

8 Another customer at the local public hearing held Monday, January 9,
9 2012, at the St. Louis County Library stated that upon contacting the call center regarding
10 a billing issue, a customer service representative informed him that there was no way to
11 escalate his issue. This information is erroneous, as the Company has a procedure in
12 place for the escalation of calls received at its call centers.

13 Q. What is Staff's recommendation regarding the Company's call center's
14 handling of initial customer contacts?

15 A. If the customers' choice of communication is to telephone the Company's
16 call center, the Company should provide resolution to the customer's request. Ideally,
17 first call resolution should be provided the customer. Staff realizes that such resolutions
18 are not always possible and that is why the ability to contact supervisory personnel is
19 critical.

20 Q. Does the Company have a policy addressing the escalation of a customer
21 call to its call center?

22 A. Yes. In the Company's response to Staff's Data Request No. 75, it
23 indicates that at the first level the customer service representative should solicit the

1 advice and assistance of the Help Queue, if necessary. At the second level, the customer
2 service specialist (CSS) would escalate the call to a team supervisor, if necessary. At the
3 third level, the team supervisor would escalate the call to a group supervisor or manager,
4 if necessary. The response further states:

5 If a resolution cannot be achieved on a customer's account
6 through assistance from a CSS, supervisor, group
7 supervisor, or manager it is appropriate to escalate to the
8 appropriate functional area within the CSC. For example:
9 In the case of a required bill adjustment that would be the
10 Billing Department, for an unresolved High Bill complaint
11 that would be the Account Resolution Team (ART).

12 The Data Request response further states that:

13 The ART team may issue a service order to gather more
14 information by contacting the customer and/or issuing a
15 service order to the premise. All determinations and
16 findings made by the ART team will be communicated to
17 the customer via letter or telephone. The customer will be
18 advised that a Supervisor will be available for further
19 discussion. The customer will also be advised of their right
20 to contact their state Public Utility Commission.

21 In addition, the Commission has both an informal and formal process for customer
22 complaints.

23 Q. Does Staff have any other concerns with the Company's customer service
24 center representatives' responses to customers' contacts?

25 A. Yes, there were at least two other noted occasions that Staff was informed
26 that customers' requests to speak to a supervisor were denied. On at least two occasions,
27 the customer was informed that the supervisor was unavailable and the supervisor never
28 returned the customers' phone call, as promised. According to the Company's data
29 request response, this would not occur, as such supervisory staff is to be available. The
30 Company should ensure this does not occur.

1 Q. Is there any additional information regarding the Company's customer
2 service issues?

3 A. Yes. Some of the customer information that Staff obtained and had been
4 provided to the Company was information that was beneficial to the Company. The fact
5 that the Company did not respond to the information provided to them by the customers
6 is troubling to Staff. Some of the situations noted were safety hazards and it is to the
7 Company's benefit that these customers are informing it of the public safety issues. The
8 Company should respond to these public safety issues in a timely manner.

9 Q. Can you provide an example for such information that is beneficial to the
10 Company?

11 A. Yes, Staff is aware of a customer that had contacted the Company's call
12 center multiple times regarding two water main ruptures within a two-year period that
13 caused damage to her property. The customer received no response to her call center
14 contacts, so she wrote a letter to the Company and received no response to her letter. The
15 customer maintained that due to the ruptures, a large piece of asphalt had washed out
16 and her concern was that this situation could cause an accident for school buses that
17 traveled that street. Being persistent, the customer contacted her city government and
18 was informed that the issue was the responsibility of MAWC. Had MAWC initially
19 responded to this customer's inquiries, any potential dangers would have been eliminated
20 in a much more timely manner.

21 Q. Does the Company record its customer calls to its two call centers?

22 A. In its response to Staff's Data Request No. 77, the Company stated "The
23 system currently records approximately 5% of the total inbound calls handled, or

1 approximately 250,000 calls per year. Approximately 90 days worth of recordings are
2 held in rolling storage.” In its response to Staff’s Data Request No. 181, the Company
3 stated the “recordings are currently used by Company management personnel to record,
4 evaluate, train and coach the CSRs in both Alton, IL and Pensacola, FL locations”.

5 The Company does not have the capability to retrieve 95% of its customer
6 calls to its call centers. Therefore, if a customer or Staff would request a particular
7 customer call for reviewing purposes, it is unlikely the request could be met.

8 Q. Does Staff have concerns regarding the Company’s call center
9 performance metrics that are being provided monthly?

10 A. Staff has not expressed concerns of the Company’s call center
11 performance metrics. Staff does have concerns with the qualitative aspects of the call
12 center performance information. Staff’s concern stems from the information received
13 from multiple customers that the customer service MAWC is providing is unsatisfactory.
14 Staff recommends that Staff meet periodically with Company personnel to discuss its call
15 center performance, review call center training, Company monitoring of its call center
16 performance and other related call center internal controls.

17 **CUSTOMER BILLING ISSUES**

18 Q. Has Staff experienced customer billing issues with the Company in the
19 past?

20 A. Yes. Throughout the review of the customer billing statements in Case
21 No. WO-2011-0168, Staff noted the occurrence of nine different types of customer
22 billing errors, some of which were violations of the Commission’s Chapter 13 Rules.
23 These errors were discussed in Staff Report, Cost of Service, filed November 17, 2011, in

1 | this case. Staff has continued to monitor a sample of the Company's monthly customer
2 | billing statements that are provided by the Company and has noticed a decline in the
3 | occurrences of these nine billing errors.

4 | Q. Does Staff have any other current billing issue concerns with the
5 | Company?

6 | A. Yes. Staff has concerns with the Company's method of estimating
7 | customer bills, the due date printed on the billing statement and the Company charging
8 | customers a \$25.00 activation fee.

9 | Q. What concerns does Staff have with the Company's method of estimating
10 | customer bills?

11 | A. During its review, Staff was informed by customers of occurrences where
12 | customer bills were estimated too high. Multiple customers have stated they realize
13 | estimates are sometimes necessary, but would prefer closer estimations by the Company.
14 | Some customers endure hardships paying the amounts before actual usage and become
15 | frustrated trying to determine if their credits on future billing statements are accurate.
16 | Some customers alleged that the Company overestimated their bills on the high side in
17 | order to receive payment of their accounts in advance of the customers' actual usage.
18 | This allegation causes concern for Staff.

19 | Also of concern to Staff is that some of the customers with high estimated
20 | bills allege that the Company informed them that they are required to pay the amount of
21 | their estimated bill in order to avoid discontinuance of service. One customer testified
22 | that he disputed an estimated bill, paid what he believed to be an appropriate amount
23 | based upon prior bills, only to receive a disconnection notice from the Company for the

1 unpaid, but yet disputed amount. Staff asserts that, under Commission Rules, when the
2 customer contacts the Company disputing an estimated bill, that the Company conducts a
3 review of the bill and the customer is not penalized for questioning the bill.

4 Staff asserts that the Company should estimate bills as specified in the
5 Commission's Rules and work with Staff on any different interpretation of these Rules to
6 come to an agreeable solution to this issue.

7 Q. Does Staff have any other concern regarding the Company's estimation of
8 customer bills?

9 A. Yes, Staff has a concern regarding the effect estimating of water usage has
10 on a customers' wastewater usage charge. Typically, a customer's water usage during
11 January, February and March are used to calculate their wastewater usage charge for the
12 following twelve month period. If a customer's water usage is estimated higher than it
13 actually is during these three months, it is possible that the customer will be charged an
14 inappropriately high amount for their wastewater usage charge for the next twelve
15 months. When Staff discussed the Company's method of ensuring that its customers,
16 who have had their water usage estimated during these three months, are properly billed
17 for wastewater usage during the next twelve months, the Company indicated that it had
18 no policy. The Company stated that customers will contact the Company if they believe
19 their bill is inaccurate. Staff recommends the Company create a policy for this specific
20 situation.

21 Q. What concerns does Staff have with the printed due dates on the customer
22 billing statements?

1 A. Staff is aware that the Company prints a due date and a delinquent date on
2 its customer billing statements and that numerous customers have an issue regarding the
3 fast approaching due date on their billing statement. Some customers stated they had
4 received their billing statement after the due date on the billing statement. Customers
5 have expressed their concern about the possibility of being out of town when their bills
6 are received as well as being disconnected for delinquent payments. The customers that
7 are aware of both billing dates on the billing statement expressed their concern about the
8 process and indicated they were uncomfortable of paying their bill beyond a due date.
9 Company personnel has indicated to Staff that it plans to review the due date printed on
10 the customer billing statements in conjunction with the implementation of its new CIS.
11 Staff encourages such a review.

12 Q. What concerns does Staff have with the Company charging customers the
13 \$25.00 activation fee?

14 A. Staff is of the opinion that the Company's activation fee is not permitted
15 by the Company's tariff and is being inappropriately charged to customers. Staff witness,
16 Mr. James M. Russo, will address this matter in his Rebuttal Testimony.

17 **PAYMENT REMITTANCE PROCESS**

18 Q. Does Staff have any concerns with the Company's payment remittance
19 process?

20 A. Yes, Staff identified four occurrences of customers with multiple accounts
21 having their monthly payments improperly applied to their various accounts. These
22 customers have contacted the Company to remedy their situations, all four are on-going

1 and Staff has requested information from the Company in order to assist in the resolution
2 of these matters.

3 Additionally, Staff was made aware of a customer that had incorrectly
4 overpaid their account on-line. The customer paid her bill on September 26, 2011, but
5 noticed the error and contacted the Company the first week of October. The customer
6 informed the Company that she had overpaid her account by approximately \$5,000 and
7 requested a refund. On one occasion the Company indicated that the check was in the
8 mail and on another occasion the Company stated that the latest day for the check to be
9 mailed would be October 21, 2011. The customer eventually asked that an attorney
10 contact the Company. Following the attorney's contact of the Company, the customer
11 was issued a refund check dated October 26, 2011. Staff asserts the Company should
12 have a process in place that would identify accounts such as this so that the Company
13 could quickly remedy the situation. Staff contends that the Company should be providing
14 responses to customers' requests without the customer being required to obtain assistance
15 of an outside source.

16 **NEW CUSTOMER INFORMATION SYSTEM**

17 Q. What is the new CIS?

18 A. The new CIS is one aspect of the Company's Business Transformation
19 Program. In the Company's response to Staff's Data Request No. 183, the Company
20 indicated that some of the upgrades to the Company's NICE quality monitoring system
21 include increasing the call recording capabilities from 5% to 50% and increasing the
22 screen captures from 5% to 35%.

23 Q. What benefits does Staff assert will be provided by these upgrades?

1 A. Staff is of the opinion that the increase in recording capabilities will allow
2 the Company to retrieve customer calls when necessary. When appropriate, these
3 retrieved calls can be used for customer service training. The increased screen captures
4 will also provide the Company's supervisory personnel necessary information for training
5 of its customer service representatives. As a result, the Company should experience an
6 improvement in handling customer service and billing issues. It may also improve the
7 Company and Staff's ability to ensure customer service matters are being addressed by
8 the Company in a satisfactory manner.

9 **CUSTOMER COMMENT CARDS**

10 Q. Please discuss the customer comment cards.

11 A. To date, Staff of the Engineering and Management Services Unit (EMSU)
12 has reviewed 332 customer comment cards of the greater than 9,000 executed comment
13 cards received by the Commission as of January 6, 2012. The Company mailed
14 approximately 417,000 customer comment cards to its Missouri customers. Staff has
15 received more mail, approximately 12,000 pieces to date, as a result of this mailing, but
16 these numbers focus on the comment cards mailed back to Staff. More detailed
17 information regarding these comment cards and the process will be provided in a Report
18 separately filed in this case by the Staff's Consumer Services Department. The table
19 below displays the various categories and number of comments received for each
20 category of the 332 customer comment cards the EMSU reviewed:

21

1

Billing	275
Customer Service	55
Inaccurate Information	24
Customer Service Center Problems	94
Union Workers	5
Objects to Rate Increase	111
Water Quality	46
Sewer Bill Problem	5
Problem with Receiving Bill	7
High Bill	15
\$25.00 Service Activation Fee	3
Problem with Protection Insurance Tactics	2

2

Staff has contacted and continues to contact customers submitting a comment card that necessitates a response or established a trend in a particular area. Those customers that stated an opinion only and did not appear to have an unresolved issue were not contacted by Staff. Several comment cards did not include customer phone numbers, had a disconnected phone number or the phone number was not located despite efforts to obtain the number. The majority of the comment cards reviewed by EMSU state the customer's poor opinion of the Company's customer service, the Company's unresponsiveness to correspondence, the Company's inability to answer questions, as well as not following through on promised responses to the customer.

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CHECKLIST FOR ACQUISITIONED WATER AND SEWER COMPANIES

12

Q. What is the Checklist for Acquisitioned Water and Sewer Companies (Checklist)?

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14

A. The Checklist is a list of items and tasks to be completed and/or reviewed by various company personnel whenever the Company acquires a new water or sewer company.

15

16

1 Q. What would be the purpose of a Checklist?

2 A. The Checklist would provide the Company a comprehensive list of all
3 tasks and items to be performed, reviewed and/or matters to be aware of whenever the
4 Company acquires a new water or sewer company. As discussed with the Company, the
5 Checklist would be a work in progress, but it would assist the Company in making an
6 acquisition as seamless as possible for the customers and assist the Company in achieving
7 easier transition with hopefully fewer problems.

8 Q. What tasks and items might be included on the Checklist?

9 A. Some of the tasks and items might include verification and accuracy of the
10 following: 1) the customer rate, 2) meter number, 3) premise number, 4) customer
11 mailing address, 5) first month customer billing statements, 6) rate type, 7) primacy fees,
12 and 8) tax rate, if applicable.

13 Q. Does the Company currently have a Checklist?

14 A. Staff is not sure. During the Staff's monitoring of the customer billing
15 statements following the acquisition of Aqua Missouri, Inc. in Case No. WO-2011-0168,
16 Staff was informed by a Company employee that the Company would be developing such
17 a Checklist. Staff expressed its opinion that such a checklist could be beneficial to ensure
18 improvements for the Company and requested a copy of the Checklist be provided Staff
19 when completed. Staff has not yet received a copy of the Checklist.

20 **RECOMMENDATIONS**

21 Q. What does Staff recommend in this case?

22 A. Staff recommends that following the completion of this case, in addition to
23 the monthly statistical data currently being provided by the Company, the appropriate

1 Company personnel meet periodically with Staff to discuss customer service issues, call
2 center performance and training, customer billing issues, payment remittance issues and
3 any other issues that Staff determines necessary to discuss. Staff will work with the
4 Company in determining the meeting dates, the subject matters to be discussed and
5 meeting locations. Staff anticipates that the meetings will be held on an as-needed basis
6 and will continue until Staff determines they are no longer necessary. If the informal
7 structuring of these meetings is not successful, Staff will take any steps it believes
8 necessary to bring the matter before the Commission.

9 Q. Why does Staff recommend these periodic meetings with the Company?

10 A. Staff is aware of a variety of customer service, customer billing and
11 payment remittance issues that the Company is experiencing as illustrated by this
12 Rebuttal Testimony. Although the monthly call center statistical data is beneficial, Staff
13 would like to ensure that quality service and customer contact resolution is adequately
14 maintained. Staff's desire is to work with the Company to assist and hopefully resolve
15 these issues. Additionally, these meetings would provide the opportunity for discussion
16 between the Company and Staff should any customer related issues occur in the future.

17 Q. Does Staff meet with other utilities to discuss customer service and or
18 billing issues?

19 A. Yes, Staff is currently meeting on a quarterly basis with Kansas City
20 Power & Light Company. The Report and Order in Case No. EM-2007-0374 states:

21 Beginning ninety days after the closure of the authorized
22 transactions, KCPL and Aquila will, on a quarterly basis,
23 engage in periodic customer service performance reviews
24 with the Commission's Staff, including the quarterly filing,
25 with Staff of monthly service quality data;

1 Staff has also had similar regular meetings with other regulated utility companies in
2 Missouri when service quality performance concerns have arisen in areas such as call
3 center performance, estimated meter reads, service order backlogs and other topics.

4 Q. Does Staff have any other recommendations?

5 A. Yes, Staff recommends the following: 1) that the Company provide its
6 Checklist to Staff, 2) that the Company create a policy to ensure the estimated usage used
7 for wastewater bills is accurate and 3) that the Company continue its review of the due
8 date printed on bills in conjunction with the implementation of the new CIS.

9 Q. Does this conclude your Rebuttal Testimony?

10 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water)
Company's Request for Authority to)
Implement A General Rate Increase for Water)
and Sewer Service Provided in Missouri)
Service Areas)

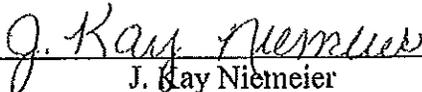
Case No. WR-2011-0337

AFFIDAVIT OF J. KAY NIEMEIER

STATE OF MISSOURI)
)
COUNTY OF COLE)

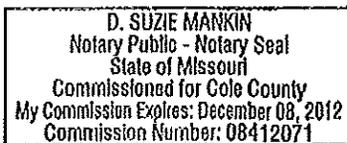
ss.

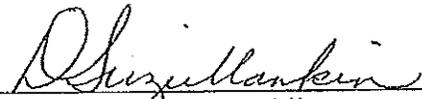
J. Kay Niemeier, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Rebuttal Testimony in question and answer form, consisting of 20 pages to be presented in the above case; that the answers in the foregoing Rebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.



J. Kay Niemeier

Subscribed and sworn to before me this 19th day of January, 2012.





Notary Public