

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

Staff of the Missouri Public Service Commission,	)	
	)	
Complainant,	)	
	)	
v.	)	File No. EC-2015-0309
	)	
Kansas City Power & Light Company	)	
	)	
And	)	
	)	
KCP&L Greater Missouri Operations Company,	)	
	)	
Respondents.	)	

**REPLY OF KANSAS CITY POWER & LIGHT COMPANY AND  
KCP&L GREATER MISSOURI OPERATIONS COMPANY TO  
SCRIPT REVISIONS PROPOSED BY STAFF AND PUBLIC COUNSEL**

Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”; collectively, the “Company”), by and through its counsel, hereby submits their reply (“Reply”) to the May 20, 2016 filings by the Staff of the Commission (“Staff”) and the Office of the Public Counsel (“OPC”) related to the Company’s *Response to Order Directing Filing* which contained a draft revised customer service representative script (“Response”) filed with the Missouri Public Service Commission (“Commission”) on May 10, 2016.

**I. PROCEDURAL BACKGROUND**

1. On April 27, 2016, the Commission issued a Report and Order (“Order”) directing the Company, among other things, to file for Commission approval a modified customer service representative script.

2. On May 10, 2016, the Company filed its Response with the Commission pursuant to the Order.

3. On May 11, 2016, the Commission issued an order establishing May 20, 2016 as the deadline for any parties wishing to comment on the Company's Response.

4. On May 20, 2016, the Commission Staff ("Staff") and the Office of the Public Counsel ("OPC") filed their separate proposed script revisions.

## II. FACTUAL BACKGROUND

5. The Company hereby incorporates Paragraphs 1-5 of its Response previously filed with the Commission on May 10, 2016.

## III. REPLY

6. Although the Company believes the script revisions it originally proposed on May 10, 2016 comply with the Commission's directives, it hereby states its willingness to move forward with the script revisions proposed by Staff, subject to minor adjustments as explained below. Specifically, the Company requests that the Commission approve the script revisions proposed by Staff with the revisions shown below:

Mr./Ms. \_\_\_\_\_, [Verify ~~Customer Order~~ Information ~~and Provide Confirmation Number~~  
~~This is your electric service confirmation number \_\_\_\_\_.~~ Now that I have completed your electric service order, I'd like to transfer you and your order information to our partner Allconnect, a company that can confirm your order for accuracy and assist you with the transfer or setup of home services, such as TV and Internet. May I transfer you ~~and your order information~~ to Allconnect at this time?

*If customer's answer is "yes", the call is transferred.*

*If customer's answer is "no": the call is concluded.<sup>1</sup>*

~~Mr./Ms. \_\_\_\_\_, your call is complete. Thank you for calling KCP&L or GMO.~~

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<sup>1</sup> For clarity, the entire script would read as follows:

Mr./Ms. \_\_\_\_\_, [Verify Order Information and Provide Confirmation Number] Now that I have completed your electric service order, I'd like to transfer you and your order information to our partner Allconnect, a company that can confirm your order for accuracy and assist you with the transfer or setup of home services, such as TV and Internet. May I transfer you to Allconnect at this time?

If customer's answer is "yes", the call is transferred.

If customer's answer is "no": the call is concluded.

- Insertion of “Order” in lieu of “Customer” on the first line better aligns language with actions taken by the Customer Service Representative (“CSR”).
- Prompt for both order verification and provision of confirmation number on the first line, along with deletion of “This is your electric service confirmation number \_\_\_\_\_. ”from the second line, provides more efficient direction to the CSR and is likely to improve overall call handling.
- Adding “confirm your order for accuracy and” on the fourth line more accurately reflects what the Allconnect agent will do should the call be transferred.
- Deleting “and your order information” from the sixth line eliminates needless redundancy (“and your order information” is also included on the third line) and is likely to improve overall call handling.
- Adding “the call is concluded” on the eighth line and deleting “Mr./Ms. \_\_\_\_\_, your call is complete. Thank you for calling KCP&L or GMO.” on the ninth line recognizes both that the Commission’s directives in its Order did not cover the closing of the call and that Commission orders have recognized that the Company has consistently branded itself as “KCP&L”.

7. The script revisions proposed by OPC exceed the Commission’s directives and would needlessly require additional time in connection with transferring or not transferring calls to Allconnect to the detriment of both customers and the Company. The Commission should therefore reject OPC’s proposed script revisions.

8. OPC also asks that the Commission require the Company to explain how it “intends to comply” with the directive that Allconnect revenues and expenses be accounted for “above the line”. The Company fully intends to account for Allconnect revenues and expenses “above the line” but is not aware of any requirement in the Report and Order that it obtain Commission approval of the details of how it intends to do so. The Company submits that this too is an excessively broad reading of the Report and Order by OPC, and that OPC’s request is unnecessary. While the Company’s “intention to comply” may be of interest, what really matters is that the Company actually complies. This can only be assessed after the fact and the Company asserts that both the Staff and OPC will have ample opportunity to audit the Company’s compliance efforts in other cases (for example, GMO’s ongoing rate case, Case No. ER-2016-0156).

WHEREFORE, the Company respectfully requests that the Commission issues its order no later than May 25, 2016 which approves the script revisions proposed by Staff as revised in paragraph 6 above.

Respectfully submitted,

/s/ Robert J. Hack

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and KCP&L Greater Missouri Operations Company

#### **CERTIFICATE OF SERVICE**

A copy of the foregoing has been served this 23<sup>rd</sup> day of May 2016 upon parties of record in this proceeding.

/s/ Robert J. Hack

Robert J. Hack