

# GO-2020-0182

# December 2023 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 meeting that occurred in April 2023 and September 2023, 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 2023 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 2023 Update:

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

#### September 2023 Update:

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

#### December 2023 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 2023 Update:

Spire continues to hold quarterly refresher training. 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.

# September 2023 Update:

Spire continues to ensure account notation is top of mind for CSRs. The most recent Customer Contact refresher was completed in August of 2023. 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.

# December 2023 Update:

Spire remains committed to maintaining a high standard of account notation among our CSRs. The most recent Customer Contact refresher was completed in October 2023. Our coaches in the Connect Center continue to assess representatives' Customer Contact entries and Calls Handled reports. This ongoing review process ensures that our representatives consistently maintain detailed and comprehensive records for each customer interaction.

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 2023 Update:

Spire is unaware of any situation in 2022 where it was not able to provide call recordings when requested.

#### September 2023 Update:

There are no additional updates.

# December 2023 Update:

There are no additional updates.

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 2023 Update:

In January 2023, Spire added screen recordings for Alorica. This is now complete as all of our internal and external rep calls have audio and screen recordings.

# September 2023 Update:

There are no additional updates.

# December 2023 Update:

There are no additional updates.

# **Business Operations**

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

# April 2023 Update:

There are no additional updates.

# September 2023 Update:

There are no additional updates.

#### December 2023 Update:

There are no additional updates.

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

# April 2023 Update:

Spire has perfected the 8-week training for internal and external reps. We have not hired additional third-party reps this spring since we finalized the training, however when we hire another group of third-party reps, they will receive the 8-week training.

#### September 2023 Update:

Spire has a scheduled new-hire training for third-party to begin on October 9,2023. We will follow our 8-week training agenda with the October session.

#### December 2023 Update:

The training for new hires within our Third-Party CSR team was successfully completed on November 10th, 2023, utilizing the updated agenda.

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 2023 Update:

There are no additional updates.

#### September 2023 Update:

There are no additional updates.

# December 2023 Update:

There are no additional updates.

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 2023 Update:

Spire has initiated the first phase of the project to transition off of the L&G system by April 2025. Through April 20, 2023, 132,481 ultrasonic meters have been installed. In this phase, all inside meter work generated by L&G has been transitioned back to Spire employees, and ultrasonic meters are being installed to replace diaphragm meters with L&G modules. When work is required on the premise of a customer with an inside meter, the meter is being replaced with an ultrasonic meter. The ultrasonic meter replacement tempo has increased to approximately 12,000 replacements a month. The replacements are prioritized based on the following:

- Meters with L&G module issues or alarms
- Inside meters
- Obsolete meter types and sizes
- Outside meters that are older than 10 years old.

Spire is currently in discussions with L&G on a plan to transition the management of all L&G-related equipment issues and alarms to Spire so that work can be managed by Spire as part of the transition from the L&G system. Spire is already receiving all issues, periodically, from L&G and directing response to by Spire based on the priorities list above. The only area not fully transitioned are new issues reported on outside meters. The goal of the current discussions is to transition the full management of this work to Spire by mid-summer 2023.

Over 4,000 obsolete large meters have been replaced or upgraded. These meters will be retrofitted with LTE-M cellular communication devices beginning in May 2023 that will provide hourly readings and operational data and alarms. All meters with a capacity > 800 Cfh will be replaced or upgraded to this technology by April 2025.

#### September 2023 Update:

Through September 24, 2023, 209,448 ultrasonic meters have been installed. When work is required on the premise of a customer with an inside meter, the meter is being replaced with an ultrasonic meter. The ultrasonic meter replacement tempo has increased to approximately 18,000 replacements a month. The replacements are prioritized based on the following:

- Meters with L&G module issues or alarms
- Inside meters
- Obsolete meter types and sizes
- Outside meters that are older than 10 years old.

Spire is continuing discussions with L&G on transitioning the management of all L&G- related equipment issues and alarms to Spire so that work can be managed by Spire as part of the transition from the L&G system. Spire is receiving all issues, periodically, from L&G and directing meter exchanges to Spire employees based on the priorities list above.

7,806 obsolete large meters have been replaced or upgraded through September 24, 2023. These meters are being retrofitted with LTE-M cellular communication devices. Approximately 500

have been completed, with a monthly tempo of 500 to 1000 a month. These communication devices replace the L&G modules and provide hourly data once a day to Spire. All meters with a capacity > 800 CFH will be replaced or upgraded to this technology by April 2025.

# December 2023 Update:

Through December 11, 2023, 236,833 Ultrasonic meters have been installed. When work is required on the premise of a customer with an inside meter, the meter is being replaced with an ultrasonic meter. The ultrasonic meter replacement tempo has decreased as expected during the fall season to approximately 10,000 to 13,000 replacements a month. The final replacement strategy is being planned for the period beginning in Calendar Year 2024 through the end of the Landis & Gyr contract in April 2025. During this phase Spire will begin to target specific meters for replacement. Also, during this phase, a process will begin to replace L&G communication modules on newer, standard outside meters that will not be replaced. The meter replacements will continue to be prioritized based on the following:

- Meters with L&G module issues or alarms
- Inside meters
- Obsolete meter types and sizes
- Outside meters that are older than 10 years old.

Spire has continued discussions but has not reached agreement with L&G on transitioning the management of all L&G related equipment issues and alarms to Spire. During this final phase Spire will manage the transition of equipment off L&G when it exhibits problematic behavior. L&G remains responsible for the timely resolution of module issues on equipment that is still connected to their network. Spire is receiving all issues, periodically, from L&G and directing meter exchanges to Spire employees based on the priorities list above. 8,991 obsolete large meters have been replaced or upgraded through December 11, 2023. These meters are being retrofitted with LTE-M cellular communication devices. A total of 3,115 have been completed, with a monthly tempo of 500 to 1000. These communication devices replace the L&G modules and provide hourly data once a day to Spire. All meters with a capacity > 800 CFH will be replaced or upgraded to this technology by April 2025.

# **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 2023 Update:

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

#### September 2023 Update:

No additional updates.

#### December 2023 Update:

No additional updates.

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 2023 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.

# September 2023 Update:

No additional updates

# December 2023 Update:

No additional updates.