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(Missouri Water) LLC d/b/a Liberty
Case Nos.: WR-2024-0104 and
SR-2024-0105
Date Testimony Prepared: March 2024

**Before the Public Service Commission
of the State of Missouri**

Direct Testimony

of

Hayley Sirmon

on behalf of

Liberty Utilities (Missouri Water) LLC d/b/a Liberty

March 13, 2024



TABLE OF CONTENTS
FOR THE DIRECT TESTIMONY OF HAYLEY SIRMON
LIBERTY UTILITIES (MISSOURI WATER) LLC D/B/A LIBERTY
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
CASE NOs. WR-2024-0104 AND SR-2024-0105

SUBJECT	PAGE
I. INTRODUCTION	1
II. MISSOURI WATER AND WASTEWATER INVESTIGATION.....	2
III. AMI.....	9
IV. TARIFF BOOK CONSOLIDATION.....	9

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Hayley Sirmon, and my business address is 602 S. Joplin Ave., Joplin,
4 Missouri, 64802.

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

6 A. I am employed by Liberty Utilities Service Corp. (“LUSC”) as the Director of
7 Customer Experience for the Central Region, which includes Liberty Utilities
8 (Missouri Water) LLC d/b/a Liberty (“Liberty” or the “Company”). In this role, which
9 I assumed on July 3, 2022, I am responsible for the experiences of our customers,
10 overseeing Contact Center Operations, Customer Service Offices, Collections and
11 Low-Income Programs.

12 **Q. On whose behalf are you testifying in this proceeding?**

13 A. I am testifying on behalf of Liberty.

14 **Q. Please describe your educational and professional background.**

15 A. I graduated from Missouri Southern State University in 2009 with a Bachelor of Arts
16 degree in History. I began my employment with The Empire District Electric Company,
17 an affiliate of Liberty, in February of 2012 as a Contact Center Representative. I also
18 worked as a Customer Service Representative in the Credit and Collections department
19 before returning to the Contact Center as the Manager in March of 2015. I graduated
20 from Missouri Southern State University in 2018 with a Bachelor of Arts degree in
21 Business Management. In January of 2022, I was promoted to Senior Manager of

1 Customer Service, and in July of 2022, I was promoted to my current position of
2 Director of Customer Experience for the Central Region.

3 **Q. Have you previously testified before the Missouri Public Service Commission**
4 **(“Commission”) or any other regulatory agency?**

5 A. This is my first-time filing testimony before the Commission. However, I have
6 submitted testimony before the Arkansas Public Service Commission (Case No. 22-
7 085-U).

8 **Q. What is the purpose of your direct testimony in this proceeding?**

9 A. The purpose of my testimony is to describe Liberty’s customer service as it relates to
10 portions of the Missouri Commission Staff’s investigation into Liberty’s water and
11 wastewater operations, Case No. WO-2022-0253, and changes made to improve the
12 customer experience.

13 **II. MISSOURI WATER AND WASTEWATER INVESTIGATION**

14 **Q. What is the Missouri Water and Wastewater Investigation?**

15 A. On March 23, 2022, the Staff of the Commission filed a motion to open an investigatory
16 docket requesting that the Commission start an investigation into the operation and
17 condition of Liberty’s water and wastewater operations. That matter was assigned File
18 No. WO-2022-0253. On November 23, 2022, Staff filed a Report containing its
19 findings and recommendations. On January 19, 2023, the Commission issued an order
20 accepting the Staff Report and directing Liberty to “address its progress and future
21 plans to implement Staff’s recommendations as part of its direct testimony” in its next
22 rate case.

23 **Q. As a result of the Missouri Water and Wastewater investigation (WO-2022-0253),**
24 **Staff recommended that “Liberty continue to evaluate methods that could be**

1 **utilized to further define the number of calls by state and by category (type) of**
2 **customer inquiry handled by a CSR at a Call Center.”¹ How has this been**
3 **implemented?**

4 A. As of June 29, 2022, Liberty can track calls by commodity (electric, gas, and water).
5 We were previously able to only separate gas customers because they called an 800
6 number different than Liberty’s electric, water and wastewater customers to speak with
7 a Customer Service Representative (CSR). We were not able to separate water and
8 wastewater calls because they called the same 800 number as electric customers.
9 However, in June 2022 we implemented a change to the Interactive Voice Response
10 (IVR) that asks customers calling our 800 number to choose whether they are calling
11 to discuss their electric or water account.

12 In early 2023, Liberty requested our phone vendor to build a new report, which
13 would allow the Company to also track calls by state. The report was completed and
14 tested in May of 2023. The report is generated by using the area code of the caller and
15 sorts total calls by state for the selected time period. This report is not a perfect solution
16 as some customers keep cell phones from previous states, but it does give us an idea of
17 the location of our customers when they contact us. As Liberty continues to make
18 changes to our Customer Information System (CIS) and other systems, we will continue
19 to look for better ways to track this information.

20 **Q. Is other caller-specific information tracked by Liberty?**

21 A. Yes. Liberty tracks the reason for customer calls through our wrap-up codes. We
22 currently have 15-20 options for CSRs to choose from. These options can change as
23 new projects begin or if there is something we feel will drive calls during a period of

¹ Page 24 of Staff Report, Case No. WO-2022-0253.

1 time. At the end of the call, the CSR selects the best option for the primary reason for
2 the customer call from the list of codes.

3 **Q. As a result of the investigation in 2022, Staff recommended that “Liberty develop**
4 **a method to measure the number of bills with irregularities sent on to Billing**
5 **Operations for further review. Data should also be maintained on the reasons for**
6 **the review, results of the review, and any actions or corrections made.”² Has this**
7 **issue been addressed?**

8 A. Yes. Liberty expects to move into its new CIS, System Application and Products in
9 Data Processing (SAP), in the second Quarter of 2024. The system will be configured
10 to set aside meter readings or billing documents into various queues to be resolved.
11 There are queues and reports that will be leveraged to identify work that is outstanding
12 and reports to see what work has been performed, by whom, and when. Examples of
13 our most common exception queues, which will be reviewed are: Implausible
14 Readings, Billing and Invoicing Outsorts and Business Process Exception Management
15 (BPEMs).

16 Implausible Readings are readings that fall outside of consumption validation
17 configurations. The team is to review the readings before releasing the reading to bill
18 or if necessary, the team member will take action on a reading that needs to be verified
19 or corrected before billing. This is similar to a high/low report.

20 Billing and Invoicing Outsorts is a report that Liberty will configure to identify
21 billing documents or invoices of certain dollar thresholds for each rate category. Any
22 billing or invoice documents that are outside of the thresholds are configured to appear
23 in the outsort queues. The Billing team reviews the outsorts and either releases the

² Page 24 of Staff Report, Case No. WO-2022-0253.

1 billing document or invoice after reviewing or they reverse the outsort to make a
2 correction.

3 The final common exception queue I will discuss is the BPEM queue.
4 Examples of possible items in the BPEM queue are a contract or invoice that is blocked
5 from billing, an account missing a move-in meter reading, and a billing period that falls
6 outside a specified number of days. Various BPEMs will be configured to capture
7 specific scenarios that need to be reviewed and corrected or released.

8 Liberty will maintain data regarding the type of exception that is created,
9 whether certain exceptions were released or reversed, and each account will have
10 information showing any correction made. Data will be retained in accordance with our
11 data retention policy.

12 **Q. As a result of the investigation in 2022, Staff recommended that “Liberty Water**
13 **ensure CSR training includes informing its customers of their rights to contact the**
14 **Commission's Consumer Services Department in instances when they are unable**
15 **to resolve their issue with Liberty.”³ Is that information included in CSR**
16 **training?**

17 A. Yes. Liberty’s CSRs are trained on how to escalate complaints, which includes the
18 right to contact the Commission's Consumer Services Department. CSRs are trained to
19 first attempt to resolve the complaint. If the original CSR is unable to resolve the
20 complaint, the next step is to utilize the assistance of a Senior CSR. If the Senior CSR
21 is unable to resolve the complaint, the customer will be referred to either a specialist or
22 supervisor and finally, a manager. If, at any time, the customer asks for an additional
23 step or specifically asks for the contact information for the Missouri Public Service

³ Page 24 of Staff Report, Case No. WO-2022-0253.

1 Commission, the CSRs, supervisors, or managers would provide that information.
2 There are also instances, depending on the customer or the specific complaint, that a
3 CSR may reach out directly to a supervisor or manager at their discretion. Moreover,
4 the contact information for the Commission's Consumer Services Department is also
5 included in the Company's new customer booklet. CSRs review the new customer
6 handbook as a part of training.

7 **Q. As a result of the investigation in 2022, Staff recommended that "Liberty maintain**
8 **a count of the types and number of water/sewer inquiries or complaints it receives**
9 **through its Call Center."⁴ What is the status of this recommendation?**

10 A. The Company currently tracks the complaints we receive that customers have made to
11 external agencies such as the Commission, Attorney General and the Better Business
12 Bureau. As mentioned above, Liberty also tracks calls with wrap-up codes, so we can
13 understand call drivers and possible concerns from customers. Liberty can also view
14 the number and types of orders issued. The orders for water customers could include
15 service trips for leaks or water quality concerns. There is also a pilot program underway
16 in the East Region of the organization, that is tracking customer complaints in the new
17 CIS. This includes complaints made to CSRs that do not escalate to an outside agency.
18 There is also reporting included with this feature that would allow Liberty to have more
19 visibility into the types of complaints and the areas from which complaints originate.
20 If the pilot is successful, the Company expects it to be rolled out across the organization
21 by mid- to late 2024, after the implementation of our new CIS.

⁴ Page 24 of Staff Report, Case No. WO-2022-0253.

1 **Q. As a result of the investigation in 2022, Staff recommended that "Liberty Water**
2 **provide clear information to its customers on how to contact the Company."**⁵

3 **What steps have been taken by Liberty in this regard?**

4 A. This information is included on our billing statements, website, and our new customer
5 booklet. When Liberty acquires a new company, we send a letter informing our new
6 customers of the acquisition, which includes information on how to contact us.

7 **Q. As a result of the investigation in 2022, Staff recommended that "Liberty Water**
8 **communicate with customers the reasons for estimated bills, particularly in the**
9 **case of frequent or consecutive estimates."**⁶ **Has Liberty changed its approach to**
10 **this notification?**

11 A. Yes. Liberty revised our estimated read letter template to include a prompt for the
12 reason for the estimated read. When the estimated read has been identified by our meter
13 readers this prompt is now included in our estimated read letter sent to the customer.

14 **Q. Have other steps been taken to track estimated billing?**

15 A. Yes. Liberty's practice is to run a daily report that identifies any customers that had
16 three or more consecutive, estimated reads. Any account on that report is sent to our
17 contact center employees who use templates to draft and mail letters to the subject
18 customers to notify them of the estimates and, if known at the time, the reason for the
19 estimates.

20 **Q. Please describe the necessary estimating in the Venice of the Lake area.**

21 A. In June of 2023, the Company began estimating around 350 water meters in the Venice
22 on the Lake system due to safety concerns. These concerns included threats to our

⁵ Page 25 of Staff Report, Case No. WO-2022-0253.

⁶ Page 25 of Staff Report, Case No. WO-2022-0253.

1 service personnel involving weapons, tick bites due to tall grass around the meters and
2 needing to enter customer homes to access some meters. To get accurate meter readings
3 for customers, the Company has hired a local contractor that is familiar with this area
4 and the customers. The contractor will read each meter at least every other month. If
5 time permits, the contractor will read the meters every month. This process will be
6 modified as meter installations in Venice on the Lake are completed.

7 **Q. As a result of the investigation in 2022, Staff recommended that “Liberty Water**
8 **CSRs utilize account notes to document conversations with customers and actions**
9 **taken on accounts.”⁷ Has this been done?**

10 A. Yes. CSRs are trained to make notes of their conversations with customers in the CIS.

11 **Q. As a result of the investigation in 2022, Staff recommended that “Liberty Water**
12 **develop and utilize more effective practices for the communication of boil**
13 **advisories at all systems.”⁸ How are customers now notified of such orders?**

14 A. Liberty’s current practice is to notify customers by phone of the boil advisory if there
15 are fewer than 25 customers impacted. If there are more than 25 customers impacted,
16 field workers will either hang door tags or place signs in the neighborhoods affected.
17 Website alerts are also utilized to notify our customers of boil advisories.

18 As part of the Company’s transition to Customer First, we will also be
19 implementing a new platform for customer notifications called OnSolve. With
20 OnSolve, Liberty will be able to notify customers through text messages of boil
21 advisories.

⁷ Page 25 of Staff Report, Case No. WO-2022-0253.

⁸ Page 25 of Staff Report, Case No. WO-2022-0253.

1 **III. AMI**

2 **Q. Are you familiar with the interaction of the Company's Advanced Metering**
3 **Infrastructure ("AMI") with the customer service operations of the Company?**

4 A. Yes.

5 **Q. What customer benefits are associated with the use of AMI?**

6 A. With AMI, a Liberty CSR has more information readily available, making their
7 responses to customers timelier. Currently, in My Account, water customers with AMI
8 meters can view their monthly consumption; however, the ability to view hourly and
9 daily usage is something that we plan to pursue with our vendors. This would allow our
10 customers to view near real time usage information and have a better understanding of
11 when they are consuming water and what factors may affect their consumption.

12 **IV. TARIFF BOOK CONSOLIDATION**

13 **Q. Liberty witness Penna has indicated that the proposed consolidation of the**
14 **Company's rules and regulations into one water tariff and one wastewater tariff**
15 **will help Company personnel. How would such consolidation help in regard to**
16 **customer service?**

17 A. Consolidating the rules and regulations and service charges would help Liberty's CSRs
18 provide better service due to more consistent rules across our Missouri water and
19 wastewater areas we serve. Upon consolidation, this would result in fewer items for
20 CSRs to research and could decrease call time if the CSRs no longer need to ensure
21 their respective responses are based on a specific Missouri service area location or to
22 refer to tariff sheets as frequently during calls with customers. This would also allow
23 us to streamline the information provided on the website for our customers.

1 Q. Does this conclude your direct testimony at this time?

2 A. Yes.

VERIFICATION

I, Hayley Sirmon, under penalty of perjury, on this 13th day of March 2024, declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Hayley Sirmon