

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

In the Matter of the Application of The Empire )  
District Electric Company d/b/a Liberty for an )  
Order Granting Billing Variances Related to the ) Case No. EE-2024-0232  
Company’s Implementation of Customer First )

In the Matter of the Application of The Empire )  
District Gas Company d/b/a Liberty Utilities or )  
Liberty for an Order Granting Billing Variances ) Case No. GE-2024-0201  
Related to the Company’s Implementation of its )  
Customer First Program )

In the Matter of the Application of Liberty )  
Utilities (Missouri Water) LLC d/b/a Liberty )  
(MO Water) for an Order Granting Billing ) Case Nos. WE-2024-0202  
Variances Related to the Company’s ) and SE-2024-0203  
Implementation of Customer First )

**INTERIM UPDATE**

**COME NOW** The Empire District Electric Company, The Empire District Gas Company, and Liberty Utilities (Missouri Water) LLC (collectively, “Liberty” or the “Company”), and submit this Interim Update regarding the Company’s implementation of Customer First. In this regard, Liberty respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. Liberty filed applications for billing practice variances from Commission Rules 20 CSR 4240-13.015(1)(C) and 20 CSR 4240-13.020(6) to accommodate a recalibration of meter reading and billing cycles needed to implement Customer First.

2. The Commission issued an *Order Granting Variances* in Case No. EE-2024-0232 on March 27, 2024. The Commission issued an *Order Granting Variances* in Case No. GE-2024-0201 on February 29, 2024. The Commission also issued an *Order Granting Variances* in Case Nos. WE-2024-0202 and SE-2024-0203 on February 29, 2024.

3. With each order, the Commission included certain conditions, including waiver of late payment fees for 90 days post-implementation and the directive that Liberty file an update on the Company's Customer First transition 90 days after the transition occurs. Liberty was directed to include the following information with this update report:

- a. A detailed description of all technical and customer service issues encountered during the transition, including what the issue was, how the issue occurred, the time period during which the issue persisted, and the resolution if applicable.
- b. The number of customers who received a bill for a usage period of less than 26 or more than 35 days for a monthly billed customer, and the reason(s) why this occurred. This should be broken down by month for each month following the transition.
- c. The number of customers whose bills were delayed following the transition and the reason for the delayed bill. This should be broken down by month for each month following the transition.
- d. Start times, end times, and duration of the following outages/closures/downtimes as part of the Customer First transition: the data processing blackout, Liberty's walk-in and drive-thru office closure, the My Account downtime, the IVR downtime, and Kubra unavailability. Any unplanned or unexpected outages/closures/downtimes should be notated as such. The Company should also list all other outages/closures/downtimes that were not included in this list but related to the Customer First transition.

4. Liberty will prepare and file a full report within 30 days following 90 days after Customer First implementation (allowing time to assess the data and prepare the report after the

90-day mark). At this time, Liberty submits this interim report to keep the Commission and interested stakeholders informed during the transition.

5. Overall, the transition to Customer First is going well for the Company and its customers. Customers appear to be especially pleased with the new billing statement form. Attached as Appendix A is the new statement form for each commodity – electric, gas, and water/wastewater.

6. There has been a “growing pain” regarding collective accounts – those accounts with more than one meter of the same commodity, not at the same address, but on one billing invoice. Liberty has approximately 15,000 collective account customers. With the conversion to SAP, Liberty moved these customers to bill at the beginning of the following month. These accounts used to bill throughout the month. With the transition, some collective bills processed for the month of May also included April billing. This issue is being addressed.

7. These collective accounts also experienced some changes for making payments through the automated phone system (“IVR”). There are two account numbers associated with a collective account – a parent (3000 level number) and a child (2000 level number). Each child will have their own 2000 level account number. The 2000 level account number does not appear on the invoice that is mailed to customers; only the 3000 level account number, or parent account number, appears on the invoice.

8. All Liberty customers continue to be able to pay their bills by phone (in addition to other methods, including online). Non-collective account customers may call Liberty and directly pay by phone (using our third party payment provider, Kubra).

9. Collective account customers, however, due to the multiple account numbers, are unable to pay by phone *within* the Liberty IVR. Instead, to pay by phone, collective account

customers need to be transferred by a Liberty customer service representative to the payment provider. We are evaluating the possibility of streamlining this process for our collective account customers.

**WHEREFORE**, Liberty respectfully submits this Interim Update. No action on the part of the Commission is requested at this time.

Respectfully submitted,

/s/ Diana C. Carter

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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed in EFIS on this 7<sup>th</sup> day of June, 2024, and sent by electronic transmission to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter