

Exhibit No.: \_\_\_\_\_  
Issue: Staff's Investigation  
Witness: Candice Kelly  
Type of Exhibit: Rebuttal Testimony  
Sponsoring Party: Liberty Utilities  
(Missouri Water) LLC d/b/a Liberty  
Case No.: WR-2024-0104  
Date Testimony Prepared: September 2024

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

**Rebuttal Testimony**

**of**

**Candice Kelly**

**on behalf of**

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

**September 27, 2024**



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LIBERTY UTILITIES (MISSOURI WATER) LLC D/B/A LIBERTY  
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
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BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
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1 **I. INTRODUCTION**

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

3 A. My name is Candice Kelly. My business address is 602 South Joplin Avenue, Joplin,  
4 MO, 64802.

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

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

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

12 A. I am testifying on behalf of Liberty.

13 **Q. Please describe your professional background.**

14 A. I began my employment with The Empire District Electric Company, an affiliate of  
15 Liberty, in July of 2006, as a Contact Center Representative. I also worked in outage  
16 management from April 2012 until January of 2017, when I was promoted to Contact  
17 Center Supervisor. In April of 2022, I was promoted to my current position of Contact  
18 Center Manager.

19 **Q. Are you adopting any direct testimony that was prefiled in this case?**

20 A. Yes. I am adopting the direct testimony of Hayley Sirmon, as Ms. Sirmon has left her  
21 position with LUSC.

1 **Q. What is the purpose of your rebuttal testimony in this proceeding before the**  
2 **Missouri Public Service Commission (“Commission”)?**

3 A. I will be addressing certain matters addressed in the direct testimony of Staff witness  
4 Lisa Stockman.

5 **II. RESPONSE TO DIRECT TESTIMONY OF LISA STOCKMAN**

6 **Q. Staff witness Stockman recommends that Liberty “[m]onitor the number of**  
7 **customers using the credit card option, whether the number of payments by credit**  
8 **card increases, and whether eliminating a fee to pay by credit card results in**  
9 **savings to the customer, to Liberty Water, or to both.” (Stockman Dir., p. 14).**  
10 **Does the Company agree to monitor credit card use in this fashion?**

11 A. Yes, the Company agrees to monitor the number of payments made by credit card. The  
12 Company is able to track the quantity of transactions made by credit card and  
13 distinguish how many were residential customers and non-residential customers and  
14 the processing fees related to these. The number of credit card transactions can be  
15 utilized to calculate the savings to customers and compared to the cost included in the  
16 rate case.

17 **Q. Ms. Stockman further states that she encourages the Company to continue to**  
18 **evaluate options for separating and reporting on calls by state. (Stockman Dir., p.**  
19 **6). Is that something Liberty is continuing to pursue?**

20 A. Yes. The Company is continuing to evaluate options for separating and reporting on  
21 calls by state. At this time, all water and sewer customers serviced on the 800-206-2300  
22 phone number are Missouri water and sewer customers (no other state). Therefore, all  
23 water and sewer calls will be Missouri water or sewer service calls by default.

1 **Q. Staff witness Stockman notes that in Commission Case No. WO-2022-0253, the**  
2 **Staff recommended Liberty ensure CSR training includes informing its customers**  
3 **of their rights to contact the Commission’s Consumer Services Department in**  
4 **instances when they are unable to resolve their issue with Liberty. (Stockman Dir.,**  
5 **pp. 3-4). Did Staff investigate Liberty’s progress on this issue?**

6 A. Yes.

7 **Q. What was the result of Staff’s investigation?**

8 A. Ms. Stockman stated that “Staff was satisfied with the handling of the calls and hopes  
9 Liberty will continue with training CSRs, managers and supervisors on informing  
10 customers of their rights to contact the Commission.” (Stockman Dir., p. 7).

11 **Q. Will the Company continue to train customer service staff to refer callers to the**  
12 **Consumer Services Department of the Commission?**

13 A. Yes, the Company agrees this is important and will continue to train all customer  
14 service staff on the proper ways to handle customer inquiries as well as to provide  
15 callers with contact information to the Commission when necessary.

16 **Q. Ms. Stockman noted the Staff’s prior recommendation that Liberty provide clear**  
17 **information to its customers on how to contact Liberty. (Stockman Dir. p. 4). Has**  
18 **Liberty taken steps to ensure this is happening?**

19 A. Yes. Staff witness Stockman notes that the Company has complied as it provides this  
20 information on billing statements, its website, and in its new customer booklet. Further,  
21 when a new service area is acquired, Liberty sends a letter informing the new customers  
22 of the acquisition and ways they may contact Liberty. (Stockman Dir., pp. 8-9).

23 **Q. Will the Company continue to ensure that contact information is clearly**  
24 **provided?**

1 A. Yes, the Company will continue to provide our contact information on billing  
2 statements and on our website, as well as other locations as appropriate.

3 **Q. The Staff also previously recommended that Liberty ensure CSRs utilize account**  
4 **notes to document conversations with customers and actions taken on accounts.**  
5 **(Stockman Dir., p. 4). What did Staff's review of this recommendation find?**

6 A. Ms. Stockman indicated that there had been improvement in this area. (Stockman Dir.,  
7 p. 10). However, she further felt that CSRs need to be continually trained to always  
8 document calls.

9 **Q. Will the Company continue to train customer service staff on proper account**  
10 **documentation?**

11 A. Yes. The Company agrees that accounts requiring notes should be documented and will  
12 continue to train CSRs to properly document accounts both as a part of new hire  
13 training as well as coaching as needed. However, the Company respectfully disagrees  
14 that all customer contacts should be documented by a CSR utilizing a note on the  
15 account in the customer information system (CIS). For example, those calls where a  
16 customer is calling only to verify their account number or balance due and asking to be  
17 transferred to the payment system does not necessitate a need to document. In these  
18 cases, adding the notation on the account distracts from more useful notes by creating  
19 more content for CSRs to read through to get to the more relevant notes.

20 **Q. In Case No. WO-2022-0253, Staff recommended that Liberty develop and utilize**  
21 **more effective practices for the communication of boil advisories at all systems.**  
22 **(Stockman Dir., p. 4). What was Staff's assessment of the Company's progress on**  
23 **this issue?**

1 A. Ms. Stockman noted that improvements had been made to these practices. (Stockman  
2 Dir., pp. 11-12). She further encouraged the Company to continue to utilize all methods  
3 available to notify customers of any alerts. (*Id.*).

4 **Q. Will the Company continue to use all methods of notification for alerts?**

5 A. Yes, the Company will continue to utilize methods available to notify customers of any  
6 alerts. The methods chosen for each instance will be determined based on the number  
7 of impacted customers.

8 **Q. Does this conclude your rebuttal testimony at this time?**

9 A. Yes.

**VERIFICATION**

I, Candice Kelly, under penalty of perjury, on this 27th day of September, 2024, declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Candice Kelly