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# Exhibit No. 112

Evergy Missouri West – Exhibit 112  
Charles A Caisley  
Surrebuttal  
File No. ER-2024-0189

Public Version

Exhibit:

Issues: Time of Use (“TOU”)  
Implementation; Customer  
Service Approach;  
Customer Complaints

Witness: Charles A. Caisley

Type of Exhibit: Surrebuttal Testimony

Sponsoring Party: Evergy Missouri West

Case No. ER-2024-0189

Date Testimony Prepared: September 10, 2024

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO.: ER-2024-0189**

**SURREBUTTAL TESTIMONY**

**OF**

**CHARLES A. CAISLEY**

**ON BEHALF OF**

**EVERGY MISSOURI WEST**

**Kansas City, Missouri  
September 2024**

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**SURREBUTTAL TESTIMONY  
OF**

**CHARLES A. CAISLEY**

**Case No. ER-2024-0189**

1 **I. INTRODUCTION**

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

3 A: My name is Charles A. Caisley. My business address is 1200 Main, Kansas City, Missouri  
4 64105.

5 **Q: Are you the same Charles A. Caisley who submitted direct testimony on February 2,**  
6 **2024 and rebuttal testimony on August 6, 2024?**

7 A: Yes.

8 **Q: On whose behalf are you testifying?**

9 A: I am testifying on behalf of Evergy Missouri West, Inc. d/b/a Evergy Missouri West  
10 (“EMW”).

11 **Q: What is the purpose of your testimony?**

12 A: My testimony will discuss portions of the rebuttal testimonies of Missouri Public Service  
13 Commission Staff (“Staff”) witness Scott J. Glasgow and Office of Public Counsel  
14 (“OPC”) witness Lisa A. Kremer.

1           **I.       UNIVERSAL CUSTOMER SERVICE / CONTACT CENTERS**

2   **Q:    In his rebuttal testimony, Staff witness Scott Glasgow states that your definition of a**  
3           **“high-touch contact center is accurate,” but asserts that “it appears Evergy’s contact**  
4           **center is migrating to a low-touch approach.” Please describe the difference between**  
5           **high-touch and low-touch approaches to customer service, and why it is important**  
6           **for Evergy to utilize both methods.**

7   **A:**   Low-touch customer service involves minimal to no human input from the Company; for  
8           example, customer service is “low touch” when a customer engages in self-service by  
9           accessing the app or website. High-touch customer service includes human interaction  
10          between Evergy employees and customers. Evergy uses both methods to meet all  
11          customers where they are, to serve their various needs. As I described in prior testimony,  
12          Evergy has customers who range from proficient technology users to those who are less  
13          comfortable, have less means to utilize all technology, and/or have a complex situation for  
14          which they feel the need to interact with a human. The latter expect, and receive, a high-  
15          touch customer service engagement. As a result, the Company is not “migrating to a low-  
16          touch approach” but is ensuring that customer service options continue to encompass  
17          technological assistance and solutions.

18                There are myriad examples of Evergy employing high-touch customer service. For  
19                example, when time-of-use (TOU) was implemented, we brought on additional call center  
20                representatives and created a dedicated line for customers calling with questions about  
21                TOU. These representatives were given specialized training in both the rates and the tools  
22                customers could use to analyze their rates. Then, those representatives were encouraged  
23                to spend as much time as necessary with customer to help educate, explain, and assist.

1 During the months of August, September, and October of 2023 those calls averaged 22  
2 minutes, which is 14 minutes longer than normal calls to our customer call centers.  
3 Another example is Evergy Connect. At our Connect centers, Evergy customers are  
4 greeted with play areas for their kids, offered beverages, have an Apple Store-like  
5 environment in which they can not only transact regarding their bill but also learn about  
6 rates, energy efficiency, electric vehicles and other Evergy programs. Connect customer  
7 representatives talk to customers individually across a booth and share access to their  
8 computer screens. Connect customer representatives are trained on working with  
9 customers to provide or assist obtaining wrap-around services. For example, Connect  
10 representatives help find heating and cooling funds, interface with landlords regarding  
11 energy efficiency, assist with finding financial services like banking and tax preparation,  
12 and have even worked to facilitate naturalization for customers wanting to establish  
13 service. Connect has multiple community events to help proactively educate and serve  
14 customers. We hold more than 100 community events specifically targeting low-income  
15 and senior customers every year. And, Evergy has Ford Sprinter vans that are equipped  
16 with computers and booths to allow taking the Connect experience to rural communities  
17 and other areas that are not typically reached by Connect centers. These are all high-touch  
18 customer experiences that reach tens of thousands of customers (seniors, hard-to-reach,  
19 low-income and at-risk customers included) every year. It is high-touch targeted on those  
20 who need and want it. Conversely, others who are banked, work normal-hour jobs, and  
21 want to transact through a mobile app or authenticated portals also have options that work  
22 24 hours a day. While those are low-touch for the customer—meaning low-effort and  
23 tailored to their needs, they are not low-effort or low-touch on the Company’s part. Rather,

1 their development, implementation, and maintenance require a strategic roadmap and  
2 significant effort and expertise. In that context, although requiring less effort for a  
3 customer, it is not less effort for Evergy.

4 **Q: Do you agree with Mr. Glasgow’s testimony that the Company’s customer service**  
5 **initiatives, including an increase in digital self-service web options and intelligent**  
6 **virtual agent (“IVA”) enhancements, are “counter-intuitive to a hands-on approach**  
7 **that helps customers feel heard and valued”?**

8 A: I disagree with Mr. Glasgow’s conclusion, but agree with many of his observations. The  
9 Company and Staff agree that Evergy has always had a goal of helping customers resolve  
10 their issues and to do so on the first call, and that if more routine calls are answered with  
11 automation, the longer calls are left for customer service representatives (“CSR”). Staff  
12 and the Company also agree that if a customer can get their needs met with an app, IVA,  
13 or on Evergy’s website, that benefits both the customer and the Company. We further  
14 agree that some customers will always need to talk to CSRs. That’s why, as I discussed in  
15 my prior testimony and above, it’s important for the Company to continue utilizing high-  
16 touch and low-touch approaches to customer service. Far from being “counter-intuitive,”  
17 it is this balance that results in the most benefits to customers and the Company alike, so  
18 that differing customer needs can be met most effectively and efficiently.

19 We want customers to have the option to transact business with us in a manner that  
20 is convenient and a good experience for them. A majority of customers prefer automated,  
21 self-service portals and intelligent IVA. Indeed, a customer experience like this is the  
22 standard in most companies today. Almost all of Amazon and Google retail is done via  
23 self-service and automation. Wal-Mart has self-service web-based options and an in-store

1 customer experience. They would be missing a big part of what their customers want if  
2 they just had one or the other.

3 The point is: categorizing customer service as high-touch, and therefore good; or  
4 this is low-touch and therefore, less desirable or bad; is not how good customer experience  
5 is designed today. We want to provide options for how customers receive their customer  
6 service. The lower touch platforms fit what many customers want and expect, and  
7 generally cost less per transaction. That is good for the customer being served and for rates  
8 to all customers. But it also creates the room and time to serve customers who need higher  
9 touch service like live customer calls and in-person visits to Connect.

10 **Q: Did the Company develop its digital or IVA customer service enhancements in**  
11 **connection with its transition to Time of Use (“TOU”) rates?**

12 A: No. My testimony in this case and prior rate cases details the various chains-of-events and  
13 reasons for the Company’s multiple customer service developments over time, but simply  
14 put, the digital and IVA enhancements in particular have been a long time coming and have  
15 had nothing to do with moving to TOU rates. The Company introduced IVA in February  
16 2021 after the Westar merger, to migrate the product Westar was using and achieve a better  
17 customer experience. Because the primary consideration is improving customer  
18 experience and results, Evergy’s efforts to elevate customer service with the latest feasible  
19 technology are constant and ongoing. The IVA is updated multiple times a year. We also  
20 look to increase the number and variety of transactions that the IVA can handle. This is  
21 based on industry standards, technological capabilities, cost considerations, and customer  
22 feedback, just to name a few of the considerations.



1 **Q: Do you agree with Mr. Glasgow’s testimony that unless “a company is willing to**  
2 **accept longer wait times for its customers, a high-touch call center will require more**  
3 **CSRs,” and his related concerns with “the availability of CSRs when customers**  
4 **require human interaction”?**

5 A: No, as I described above. Because the Company’s call centers employ both high-touch  
6 and low-touch customer service offerings, varying customer needs are being met. Call  
7 center statistics are discussed in more detail in the testimony of Cindy Circo, but they  
8 demonstrate that wait times are more than within limits (the Average Speed to Answer  
9 (“ASA”) from January-July 2024 has been 33 seconds), and customers’ questions and  
10 concerns are addressed.

11 For example, the customer feedback responses from Mr. Glasgow’s Schedule SJG-rl are  
12 few and actually include compliments to the Company. I have provided additional  
13 instances of positive customer feedback in Schedule CAC-4

14 As technology is deployed and customer satisfaction continues to be assessed, the  
15 Company will likewise continue to consider call center staffing so as to share with  
16 customers available costs savings.

17 **Q: Do you agree with Ms. Kremer’s concerns about reductions in call center hours and**  
18 **staffing, or the connection her testimony creates between those concerns and the**  
19 **Company’s customer TOU education roll-out?**

20 A: No. As discussed above, my rebuttal testimony, and in the testimony of Company witness  
21 Ms. Circo, call center statistics and exemplar customer feedback evidence overall customer  
22 satisfaction. In fact, the MPSC reports show that Evergy is having the best year since the  
23 merger for customer service metrics. Further, I explained in my rebuttal testimony that

1 while call center hours of operation have changed, the call center is still available 10 hours  
2 a day during the week, with staffing available for emergency issues during nights and  
3 weekends. Hours are also extended during significant storms or high call volume. Ms.  
4 Kremer's concerns with hours and CSR availability are just not supported by the reality of  
5 the Company's call center operations or applicable customer contact data. Rather, the  
6 Company's technological upgrades allow customers to transact in the way that works best  
7 for them.

8 As with digital and IVA offerings, the Company's call center/customer service  
9 innovations are always ongoing, and the initiatives discussed in Ms. Kremer's testimony  
10 were being planned and/or implemented before the customer education TOU roll-out.  
11 While call center metrics declined during the TOU transition months, this was both  
12 expected and it represents an outlier to prior and subsequent statistics. Indeed, the statistics  
13 during the TOU months would have been significantly worse if IVA had not been available  
14 as part of the Company's customer service options. Notably, call center metrics since the  
15 TOU transition are now better than previous levels, as discussed by Ms. Circo.

16 It's also crucial to draw a distinction between any customer dissatisfaction with the  
17 Company's call center performance, and any customer dissatisfaction with the TOU  
18 transition itself. Ms. Kremer's testimony seems to conflate the two, yet does not rely on  
19 any data establishing call center performance was "a driver of declines in customer  
20 satisfaction" during the months of August-October 2023.

1 **Q: Why did the Company adopt a 70% within 120 seconds answering standard, and does**  
2 **that affect call center staffing?**

3 A: Importantly, Staff and the Company agree that so far, the Company is surpassing its speed-  
4 to-answer goal in 2024. However, as Ms. Circo’s testimony explains, the Company’s 70%  
5 within 120 seconds answering standard is not a “low goal” negatively impacting call center  
6 staffing; rather, the Company’s approach benefits both customers and the Company.

7 **II. CUSTOMER COMPLAINTS**

8 **Q: Is there a difference between a customer inquiry and a customer complaint?**

9 A: Of course, and the difference is critical to a proper evaluation of customer feedback, call  
10 center performance, and the Company’s compliance with Commission Rules. As with any  
11 company that provides customer service within the normal course of its business, there  
12 must be a defined process for customers to submit a complaint versus an inquiry of another  
13 nature. If all customer interaction is to be considered a complaint, then getting customers  
14 the information or assistance they need would become inefficient and likely less  
15 productive. Evergy provides customers their right to complain through a variety of  
16 interfaces, and gives them straight-forward mechanisms to do so. For example, if a  
17 customer complaint cannot be resolved through the call center, the CSR informs that  
18 customer of their right to contact the MPSC and supplies the address/phone number to do  
19 so. In Missouri, door tags include information as to a customer’s right to contact the MPSC  
20 and the MPSC contact information. The same is true for Evergy’s website (Evergy.com).

1 **Q: Do you agree with Ms. Kremer that the Company may not be in compliance with**  
2 **Commission rules regarding utility complaints?**

3 A: No. The Company agrees with Staff witness Glasgow that when the MPSC's Rules refer  
4 to complaints, they are explicitly referencing formal or informal complaints registered with  
5 the Commission per the definitions in 20 CSR 4240-13.015(1)(D) and 4 CSR 240-2.070.  
6 Ms. Kremer's testimony is thus not correct that the Company is in any way non-compliant  
7 with Commission Rule 20 CSR 4240-13.040(5)(B). Therefore, the Company is not  
8 required to maintain either customer inquiries or complaints that are not registered with the  
9 PSC for two years.

10 Even so, related to the discussion above, Ms. Kremer appears to misunderstand her  
11 referenced DR response and how the Company records customer complaints. While  
12 customer complaints are not tracked in the Contact Center, the Company does monitor and  
13 track customer complaints at the account level (i.e., the Company can look up an account  
14 and obtain all of its history). Because of this and the fact that not all escalation stems from  
15 customer complaints, it would not be useful for Evergy to arbitrarily retain all issues  
16 forwarded to the escalation team for two years, or to implement a segregation process  
17 designating the operating company from which all escalated issues originated. Escalation  
18 could include a CSR calling the escalation desk when they are stumped, or if property  
19 management has a complex or unusual issue. Thus, complaints and escalations must  
20 remain in their already-defined categories and processes.

21 Mr. Glasgow testified that he had no opinion on whether EMW should track  
22 escalations, because it is a management decision for EMW. Mr. Glasgow did state he was  
23 "unaware what was causing [EMW's] inability to determine where escalations originate,"

1 but as noted above, the Company can look up the full history of a particular account as  
2 necessary. The Company does not otherwise generally “track” the originating Evergy  
3 entity from which any or all escalations occur, as Ms. Kremer advocates, because doing so  
4 would not be a productive use of resources. The same is true for Mr. Glasgow’s  
5 recommendation that “EMW should consider retaining at minimum the number and  
6 general description of escalations for two years”—again, the Company can look up a  
7 customer’s account history if necessary, but creating a new two-year retention system for  
8 escalations is neither necessary nor beneficial.

### 9 III. TOU EDUCATION / IMPLEMENTATION

10 **Q: Do you agree with Ms. Kremer that the Company’s TOU customer education**  
11 **initiatives or implementation was unsuccessful?**

12 **A:** No, as I and other witnesses have exhaustively detailed in my prior testimony. The TOU  
13 transition is complete, and the associated costs of implementation were appropriate and  
14 necessary for its success. Company witness Katie McDonald’s testimony specifically  
15 addresses Ms. Kremer’s incorrect allegations regarding the “scaring” of customers, as well  
16 as Ms. Kremer’s inaccurate allegations about the Company not following its advisors’  
17 guidance.

18 Nowhere in Ms. Kremer’s testimony does she point to any data to support her  
19 contention that customers were “scared” by the company’s education materials. Nowhere  
20 in Ms. Kremer’s testimony or that of Staff does she or any witness support the contention  
21 that the TOU implementation was not effective. All they assert is that customer satisfaction  
22 went down during this time period and that in multiple ways customers expressed  
23 frustration with TOU. But simply observing that customer satisfaction declined during

1 TOU implementation does not support causation or even correlation. Rather, the surveys  
2 and data throughout and as clearly stated in Evergy's direct and rebuttal testimony, *does*  
3 show that many customers took issue with mandatory TOU. Their comments and  
4 testimony made during public hearings months later after the implementation was complete  
5 continue to support that notion. Ms. Kremer has confused customer frustration with the  
6 fact that customers had no other option than to migrate to new TOU rates with the quality  
7 of the implementation itself.

8 **Q: Does this conclude your testimony?**

9 **A:** Yes.



**SCHEDULE CAC-4  
CONTAINS CONFIDENTIAL  
INFORMATION  
NOT AVAILABLE TO THE PUBLIC.**

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**Evergy Metro, Inc. d/b/a Evergy Missouri Metro and  
Evergy Missouri West, Inc. d/b/a Evergy Missouri West**

Docket No.: ER-2024-0189

Date: September 10, 2024

CONFIDENTIAL INFORMATION

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The following information is provided to the Missouri Public Service Commission under CONFIDENTIAL SEAL:

Document/Page	Reason for Confidentiality from List Below
Schedule CAC-4	4

Rationale for the “confidential” designation pursuant to 20 CSR 4240-2.135 is documented below:

1. Customer-specific information;
2. Employee-sensitive personnel information;
3. Marketing analysis or other market-specific information relating to services offered in competition with others;
4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;
5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;
6. Strategies employed, to be employed, or under consideration in contract negotiations;
7. Relating to the security of a company's facilities; or
8. Concerning trade secrets, as defined in section 417.453, RSMo.
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