

Exhibit No.:
Issues: Paperless Billing/Customer
Satisfaction/Call Center Findings/
Credit Card Fee Messaging, Customer
Complaint and MyWater
Witness: Derek Tarca
Exhibit Type: Rebuttal/Surrebuttal/Sur-Surrebuttal
Sponsoring Party: Missouri-American Water Company
Case No.: WR-2024-0320
Date: January 24, 2025

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. WR-2024-0320

REBUTTAL/SURREBUTTAL/SUR-SURREBUTTAL TESTIMONY

OF

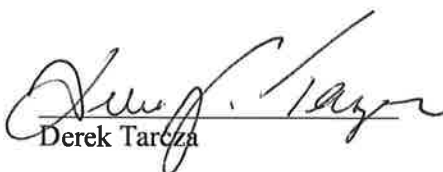
DEREK TARCZA

ON BEHALF OF

MISSOURI-AMERICAN WATER COMPANY

AFFIDAVIT

I, Derek Tarcza, under penalty of perjury, and pursuant to Section 509.030, RSMo, state that I am a Principal Regulatory Analyst for American Water Works Service Company, Inc., that the accompanying testimony has been prepared by me or under my direction and supervision; that if inquiries were made as to the facts in said testimony, I would respond as therein set forth; and that the aforesaid testimony is true and correct to the best of my knowledge and belief.



Derek Tarcza

January 24, 2025

Dated

**REBUTTAL/SURREBUTTAL/SUR-SURREBUTTAL TESTIMONY
DEREK TARCZA
MISSOURI AMERICAN WATER COMPANY
CASE NO.: WR-2024-0320**

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REBUTTAL/SURREBUTTAL/SUR-SURREBUTTAL TESTIMONY

DEREK TARCZA

I. INTRODUCTION

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Derek Tarcza, and my business address is 1 Water Street, Camden, NJ 08102.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by American Water Works Service Company, Inc. (“Service Company” or “AWWSC”) within the Customer Service Organization (“CSO”) as Sr. Manager, Customer Digital Products and Innovation.

Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A. I hold a Bachelor of Arts in Economics and IT from Rutgers University. I have spent over 20 years working in project management, problem solving, and improving customer experience. I have worked in various industries including logistics, communications, and utilities. I started working at the Service Company in 2021 as a Principal Program Manager in the Customer Service Organization, and was promoted to Sr. Manager, Customer Digital Products and Innovation, in 2023.

Q. WHAT ARE YOUR CURRENT EMPLOYMENT RESPONSIBILITIES?

A. As Sr. Manager, Customer Digital Products and Innovation, I am responsible for management of our customer and operational systems, process improvement, and the digital customer experience.

Q. HAVE YOU EVER TESTIFIED BEFORE A UTILITY COMMISSION?

1 A. No, I have not.

2 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL/SURREBUTTAL/SUR-**
3 **SURREBUTTAL TESTIMONY IN THIS PROCEEDING?**

4 A. The purpose of my Rebuttal/Surrebuttal/Sur-Surrebuttal Testimony is to respond on behalf
5 of Missouri-American Water Company (“MAWC” or the “Company”) to the
6 Direct/Rebuttal Testimony of Office of Public Counsel (“OPC”) witness Angela Schaben
7 regarding customer satisfaction , the Direct/Rebuttal Testimony of Staff witness Charles
8 Thomason regarding MAWC’s paperless billing proposal, the call center audit agreed to in
9 the Stipulation and Agreement in Case No. WR-2022-0303, credit card fee messaging on
10 the Company’s MyWater website, the Cross-Rebuttal Testimony of Office of Public
11 Counsel (“OPC”) witness Manzell Payne on the paperless billing proposal and MyWater
12 portal; and, the Cross-Rebuttal Testimony of OPC witness Geoff Marke concerning a
13 customer complaint and MyWater.

14 **II. CUSTOMER SATISFACTION**

15 **Q. ON PAGE 5 OF HER DIRECT/REBUTTAL TESTIMONY, OPC WITNESS**
16 **SCHABEN ASSERTS THAT CUSTOMERS ARE NOT SATISFIED WITH THE**
17 **QUALITY AND AFFORDABILITY OF THEIR SERVICE. DO YOU AGREE?**

18 A. No, I do not. Ms. Schaben’s conclusion suffers from selection bias. She develops her
19 conclusion solely based upon the customer comments received in this rate case about the
20 proposed rate increase. Customers who file comments in rate cases may be more likely to
21 negatively respond about proposed increases, and there is little incentive for them to
22 express any positive remarks about the Company. Therefore, these comments should not
23 be considered representative of MAWC’s entire customer base. In fact, as of January 16,

1 2025, there are only 138 consumer comments associated with this case, which is a mere
2 fraction of the Company's over 500,000 customer base in Missouri. It is erroneous to
3 conclude based upon such a small sample size that MAWC customers are dissatisfied with
4 their service solely based upon the comments received in this rate case regarding the rate
5 increase. As discussed in Mr. Rea's Direct Testimony, MAWC's water and wastewater
6 service continues to be affordable for most residential customers.¹ The Company is also
7 proposing a low-income tariff to address the affordability concerns for customers who
8 struggle financially.

9 **Q. IS AFFORDABILITY OF SERVICE THE ONLY MEASURE OF CUSTOMER**
10 **SATISFACTION?**

11 A. No, it is not. While affordability is a component of customer satisfaction that the Company
12 takes seriously, there are other factors that contribute to a customer's satisfaction.

13 **Q. WHAT OTHER FACTORS CONTRIBUTE TO A CUSTOMER'S**
14 **SATISFACTION?**

15 A. J.D. Power, a global leader in consumer insights, has developed a list of eight core
16 dimensions that relate to customer satisfaction²: information provided; quality and
17 reliability; level of trust; ease of doing business; total monthly costs; people; resolving
18 problems or complaints; and digital channels. Each year, J.D. Power surveys water utilities
19 on these eight dimensions and publishes the results in the U.S. Water Utility Residential
20 Customer Satisfaction Study.

¹ Rea DT, p. 22.

² [2024 U.S. Water Utility Residential Customer Satisfaction Study | J.D. Power](#)

1 **Q. HOW HAS MAWC PERFORMED IN RECENT J.D. POWER STUDIES ON**
2 **CUSTOMER SATISFACTION?**

3 A. Over the past 5 years, which includes the time period of multiple rate cases, MAWC’s
4 customer satisfaction score has consistently been in the top half of its peer group (Midwest
5 – Large)

Year	Ranking
2024	4 th out of 102
2023	2 nd out of 10 ³
2022	3 rd out of 10 ⁴
2021	3 rd out of 10 ⁵
2020	2 nd out of 10 ⁶

6

7 **Q. WHAT CAN BE CONCLUDED FROM THIS INFORMATION?**

8 A. In contrast to Ms. Schaben’s claim, when compared with its peers, on average MAWC
9 customers are more satisfied with their water utility service than the customers of MAWC’s
10 peer utilities in the Midwest.

11

³ [2023 U.S. Water Utility Residential Customer Satisfaction Study | J.D. Power](#)

⁴ [2022 U.S. Water Utility Residential Customer Satisfaction Study | J.D. Power](#)

⁵ [2021 U.S. Water Utility Residential Customer Satisfaction Study | J.D. Power](#)

⁶ [2020 U.S. Water Utility Residential Customer Satisfaction Study | J.D. Power](#)

1 **III. CALL CENTER FINDINGS**

2 **Q. STAFF WITNESS THOMASON MENTIONS AN AUDIT THAT WAS**
3 **PERFORMED ON MAWC’S CALL CENTER AND THE SUBSEQUENT**
4 **RECOMMENDATIONS RESULTING FROM THAT AUDIT. HOW DOES THE**
5 **COMPANY PLAN TO CONTINUE TO IMPROVE THE CUSTOMER**
6 **EXPERIENCE WITH THE CALL CENTER BASED UPON THE AUDIT**
7 **REPORT?**

8 A. As noted on page 3 of Staff Witness Thomason’s Direct/Rebuttal Testimony, MAWC’s
9 call center performance statistics have meaningfully improved since the Company’s last
10 rate case. To further enhance the customer experience, in November 2024 American Water
11 updated its call center technology. One of the enhancements was the replacement of the
12 Interactive Voice Response (IVR) technology with Intelligent Virtual Assistant (IVA).
13 IVA systems leverage advanced technologies to provide a more intelligent, flexible, and
14 interactive conversational experience. It can handle complex conversations and tasks
15 beyond basic call routing. In addition, the IVA is bilingual which allows customer to both
16 receive information and perform self-service options in both English and Spanish.
17 Enabling the IVA to handle a broader array of routine inquiries and tasks will allow our
18 call center agents to focus on more critical and complex issues facing our customers. The
19 IVA can also use customer data and past interactions to personalize and continue to
20 improve the customer experience while the back-end integrations provide a smoother path
21 to resolution. This should help increase the call containment rate and improve customer
22 satisfaction. In addition, MAWC reviews customer surveys and industry best practices to
23 further improve the customer experience on an on-going basis. Company witness Jody

1 Carlson also discusses the audit in his Rebuttal/Surrebuttal/Sur-Surrebuttal Testimony.

2 **IV. PAPERLESS BILLING**

3 **Q. WHAT ARE STAFF AND OPC’S POSITION ON THE COMPANY’S PROPOSED**
4 **PAPERLESS BILLING PROGRAM?**

5 A. On page 24 of his Direct/Rebuttal Testimony, Staff Witness Charles Thomason states that
6 the Commission should reject the Company’s proposal to auto enroll customers in
7 paperless billing, believing that customers should opt in to the program, rather than having
8 to opt out of the program. On page 5 of his Cross-Rebuttal Testimony, OPC Witness
9 Manzell Payne agrees with Staff’s position.

10 **Q. DO YOU AGREE WITH THIS?**

11 A. No. As stated in the Direct Testimony of MAWC witness Jody Carlson⁷, there are multiple
12 benefits to the Company’s proposed paperless billing program, such as cost savings for
13 customers, sooner reception of the bill, reduction of the Company’s carbon footprint, etc.

14 **Q. CAN YOU ELABORATE ON THE COST SAVINGS OF PAPERLESS BILLING**
15 **GOING FORWARD?**

16 A. Yes. Again, as stated in the Direct Testimony of Company witness Jody Carlson, each
17 paperless bill yields a savings of approximately \$0.97. However, recently the United States
18 Postal Service (“USPS”) filed a document stating that they intend to raise the postage rate
19 five times through 2027.⁸ If these increases take place, the savings of sending a paperless
20 bill will be over \$1.00 per bill. The Company understands that affordability is a concern

⁷ Carlson DT, pp 45-49.

⁸ [Stamp price 2025: USPS plans July increase but won't raise prices in January](#)

1 for customers as mentioned in the comments received from customers as part of this rate
2 case proceeding. A conversion to paperless billing is an easy way to help control costs and
3 keep rates affordable for customers.

4 **Q. BESIDES THE PROPOSED POSTAGE INCREASES, IS USPS PROPOSING ANY**
5 **OTHER CHANGES THAT COULD AFFECT CUSTOMER BILLS?**

6 A. Yes. Besides the postage increase, USPS plans to cut service in rural areas in Missouri,⁹
7 which may slow down mail delivery and impact the delivery of paper bills. In an
8 environment where postage rates are rising rapidly and mail service is being cut, paperless
9 billing is becoming a more attractive option for customers to receive and pay their bills
10 timely.

11 **Q. PART OF MR. THOMASON’S ARGUMENT TO SUPPORT HIS**
12 **RECOMMENDATION THAT THE PAPERLESS BILLING PROGRAM BE**
13 **DENIED IS THAT CUSTOMERS RECEIVING PAPER BILLS ARE FULLY**
14 **AWARE OF THE OPTION TO CONVERT TO PAPERLESS BILLING BUT**
15 **HAVE CONSCIOUSLY DECIDED NOT TO PARTICIPATE. DO YOU AGREE**
16 **WITH THIS?**

17 A. No, I do not. On page 25 of his Direct/Rebuttal Testimony, Mr. Thomason erroneously
18 assumes that any customer who currently receives a paper bill has intentionally rejected
19 paperless billing. There are many reasons why a customer continues to receive a paper bill.
20 While some customers may consciously decide to receive a paper bill, others may continue
21 to receive a paper bill merely out of habit, or the effort required to switch to paperless

⁹ [Prescription delivery in Missouri faces delays under USPS rural service](#)

1 billing is more than the perceived benefit of the switch. To assume that all customers
2 receiving paper bills have consciously made a choice on how to receive their bill is
3 incorrect.

4 **Q. DOES STAFF WITNESS THOMASON'S DIRECT/REBUTTAL TESTIMONY**
5 **SUPPORT HIS CLAIM THAT CUSTOMERS RECEIVING PAPER BILLS HAVE**
6 **CONSCIOUSLY CHOSEN THIS METHOD OF BILL DELIVERY?**

7 A. No, in fact his testimony implies the opposite. On page 24 of his testimony, Mr. Thomason
8 assumes that at least 10% of customers would be unaware of the Company's paperless
9 billing conversion program, implying that these customers do not review communication
10 from MAWC. On the very next page, he concludes that all customers currently receiving
11 a paper bill have reviewed the Company's prior communication on paperless billing and
12 have consciously decided not to participate in the Company paperless billing program. To
13 believe that historically all customers on paper bills have reviewed communications about
14 paperless billing and have decided not to participate but that some of these same customers
15 would suddenly stop reviewing the information and be unaware of the paperless billing
16 program is logically inconsistent. Mr. Thomason's argument is inconsistent and should be
17 rejected.

18 **Q. IS IT POSSIBLE THAT SOME CUSTOMERS ARE NOT AWARE OF THE**
19 **BENEFITS OF PAPERLESS BILLING?**

20 A. Yes. The Company's current communication regarding paperless billing is not a directed
21 campaign but is communicated as a part of the Company's broader communication
22 strategy. It is likely that some customers may not be aware of the full benefits of paperless
23 billing as they may not closely review communications from MAWC. Furthermore, even

1 if the customers are aware of the benefits of paperless billing, the friction involved in
2 consciously choosing to convert to paperless billing may prevent customers from selecting
3 this billing option.

4 **Q. ON PAGE 13 OF HIS DIRECT/REBUTTAL TESTIMONY, STAFF WITNESS**
5 **THOMASON INCLUDES AN EXCERPT FROM A PAYLODE ARTICLE THAT**
6 **RECOMMENDS THAT A COMPANY SHOULD NOT CONVERT AN ENTIRE**
7 **CUSTOMER BASE TO PAPERLESS BILLING AUTOMATICALLY. IS HIS**
8 **OBSERVATION RELEVANT TO THE COMPANY'S PROPOSAL?**

9 A. No. Staff's emphasis of this provision implies that Staff misunderstands the Company's
10 proposal. MAWC agrees with the Paylode article about a strategic approach to paperless
11 billing conversion. MAWC's proposal is to convert a segment of the customer base, those
12 with an active MyWater account and a valid email address, to paperless billing. It was
13 never the intention of MAWC to convert the entire customer base to paperless billing, only
14 those customers who already interacted with the Company digitally.

15 **Q. STAFF WITNESS THOMASON EXPRESSES CONCERNS WITH THE**
16 **COMPANY'S PROPOSED COMMUNICATION PLAN. DOES HE PROVIDE**
17 **ANY RECOMMENDATIONS TO MODIFY THE PLAN?**

18 A. No, while he expresses concerns, he provides no recommendations on what
19 communications he would consider sufficient to notify customers of the change.

20 **Q. WHAT ARE SOME OF HIS CONCERNS?**

21 A. Mr. Thomason is concerned that some customers will not review MAWC's communication
22 on paperless billing and will be unaware of the change.

1 **Q. CAN THE COMPANY GUARANTEE CUSTOMERS WILL REVIEW THE**
2 **COMMUNICATION ON PAPERLESS BILLING?**

3 A. No, regardless of the communications methods used by MAWC, some customers will
4 choose to ignore the communication. MAWC is taking a prudent, cost-effective approach
5 to communicate with all affected customers through multiple channels, including emails
6 and a mailed postcard, to notify customers of the change.

7 **Q. CAN YOU CLARIFY THE COMPANY'S PROPOSAL AROUND EMAIL**
8 **COMMUNICATION OF THIS PROGRAM?**

9 A. Yes. The Company proposes to send two emails to customers notifying them about the
10 conversion to paperless billing. The Company will verify that the email message is
11 delivered, it will not verify if the email has been opened.¹⁰ If the email to the customer is
12 returned as undeliverable, then that customer will not be converted to paperless billing.

13 **Q. STAFF TAKES ISSUE WITH THE CONCEPT OF A CUSTOMER'S CONSENT**
14 **TO THE CHANGE IF THE EMAIL IS NOT OPENED, DO YOU AGREE WITH**
15 **THIS?**

16 A. No, just because an email is opened does not mean it was read. A customer may open the
17 email, skim it, and move to something else without fully reviewing the email. Mr.
18 Thomason seeks a guarantee that MAWC's emails will be reviewed by customers, which
19 is unreasonable and outside the Company's control. MAWC's approach to email
20 communication is reasonable. If the email bounces, the Company will remove the customer

¹⁰ Mr. Thomason suggests that MAWC witness Carlson's Direct Testimony will need to be corrected to reflect that MAWC will only verify the email was delivered (i.e., did not bounce), not opened. (Dir./Reb., pp. 23-24). This was previously corrected in a data request response provided to Staff. However, it is my understanding that Mr. Carlson will also correct his Direct Testimony prior to a request to admit the testimony into evidence.

1 from the conversion list.

2 **Q. MR. THOMASON ARGUES THAT THE POSTCARD REGARDING PAPERLESS**
3 **BILLING CONVERSION IS NOT SUFFICIENT NOTICE TO CUSTOMERS. DO**
4 **YOU AGREE WITH THIS?**

5 A. No. Mr. Thomason’s position that the postcard is insufficient notice since MAWC will not
6 verify delivery runs counter to standard utility communication practice. MAWC proposes
7 the same delivery method that is used for paper delivery of bills, the US postal system. The
8 Company does not typically send out paper bills via certified mail and should not be
9 required to do so in this case. The additional cost to send postcards via a certified mail
10 process is overly burdensome and a waste of money. The Company is proposing a
11 reasonable method of communication to inform customers. Regardless of communication
12 methods, it is outside the Company’s control how the customer chooses to review the
13 communication.

14 **Q. ON PAGES 14 AND 15 OF HIS DIRECT/REBUTTAL TESTIMONY, MR.**
15 **THOMASON EXPRESSES CONCERNS THAT THE WORDING OF THE**
16 **PROPOSED COMMUNICATION FOR THE PAPERLESS BILLING PROGRAM**
17 **WOULD CAUSE CONFUSION. IS THE COMPANY WILLING TO MODIFY ITS**
18 **COMMUNICATION PLAN TO ADDRESS THIS?**

19 A. Yes. While the Company provided sample communications as part of the discovery
20 proceeding in this rate case, MAWC would be willing to modify the proposed
21 communications to reduce any perceived confusion associated with this paperless billing
22 enrollment should the proposal be approved by the Commission. For example, if the
23 proposal is approved as is, the Company would modify the proposed communication to

1 remove the language about the Auto Pay program to reduce customer confusion.

2 **Q. STAFF IMPLIES THAT THE PAPERLESS BILLING PROGRAM SHOULD BE**
3 **REJECTED BECAUSE SOME CUSTOMERS OF MAWC'S AFFILIATES**
4 **RETURNED TO PAPER BILLING AFTER BEING CONVERTED TO A**
5 **PAPERLESS BILL. DO YOU AGREE WITH THIS?**

6 A. No, I do not. Customers' preferences change over time. Some may have tried a paperless
7 bill and then realized that they preferred a paper bill and switched back. While some
8 customers reverted to paperless billing, it was only a small portion, approximately 10%.
9 That is, a large majority of the customers, approximately 90%, did not make a change to
10 their billing preference after the auto-conversion, which is a high success rate. At any
11 point, a customer can switch between paper or paperless billing.

12 **Q. WHAT DO YOU MAKE OF THE NEGATIVE COMMENTS MR. THOMASON**
13 **CITES IN HIS DIRECT/REBUTTAL TESTIMONY ABOUT THE PAPERLESS**
14 **BILLING PROGRAM IN INDIANA?**

15 A. While I was not directly involved in the Indiana program, I can say that it is nearly
16 impossible for any company to implement a program with 100% success rate and no
17 negative feedback. However, I do have concerns with Mr. Thomason's selective use of the
18 data. On page 19, he says that the survey data in Indiana should not be used as supporting
19 evidence in gauging customer satisfaction related to paperless billing. However, on pages
20 17 and 18, he uses data from this same study to conclude, based on five negative survey
21 comments from the approximately 45,000 customers who were converted to paperless
22 billing, that overall customers were not satisfied with the implementation of the program.

1 **Q. DO YOU AGREE WITH MR. THOMASON’S CONCLUSION THAT**
 2 **CUSTOMERS WERE NOT SATISFIED WITH CONVERSION TO PAPERLESS**
 3 **BILLING?**

4 A. No, I do not. As mentioned earlier, the overwhelming majority of customers did not change
 5 their billing preference after the conversion was completed. In addition, the overall NPS
 6 score, an indicator of customer satisfaction and trust, for Indiana customers went up after
 7 the conversion took place.

8 **Q. HOW HAS CUSTOMER SATISFACTION IN INDIANA TRENDED POST**
 9 **CONVERSION?**

10 A. Customers in Indiana who receive a paperless bill have a higher NPS score and are more
 11 satisfied on the amount of time given to pay their bill in the 7–12-month time period after
 12 the conversion of customers to paperless billing. Please see the table below, which is an
 13 update to the table provided in response to MoPSC 0083.1 for the March – Aug 2024 time
 14 period. As shown below, over the 18 month period reviewed, customers who receive a
 15 paperless bill are consistently more satisfied with the time to pay their bill, since they
 16 receive it sooner than those who receive the bill through the mail.

	NPS Six Months Pre-Conversion	NPS Six Months Post-Conversion	NPS 7-12 Months Post-Conversion	'Amount of time given to pay your bill' T2B% Satisfaction Six Months Pre-Conversion	'Amount of time given to pay your bill' T2B% Satisfaction Six Months Post-Conversion	'Amount of time given to pay your bill' T2B% Satisfaction Six Months Post-Conversion
	(Feb-July, 2023)	(Sept 2023-Feb 2024)	(Mar 2024-Aug 2024)	(Feb-July, 2023)	(Sept 2023-Feb 2024)	(Mar 2024-Aug 2024)
All IN Customers	14.1	16.1	16.1	55%	56%	52%

Customers ¹¹ who received a paperless bill	21.6	15.7	17.5	65%	59%	56%
Customers who received a paper bill	5.7	16.8	14.1	43%	51%	47%
Customers with an active MyWater account	13.3	15.3	16.1	56%	56%	53%
Customers without an active MyWater account	17.7	19.8	15.8	48%	55%	48%

1

2 **Q. Both Mr. Thomason and Mr. Payne indicate that MAWC’s proposal does not result**
3 **in agreement by the customer for receiving an electronic bill, as required by**
4 **Commission Rule 20 CSR 4240 13.015(1)(B), but instead seeks to “change the**
5 **default.” (Thomason Dir./Reb., p. 20-21, Payne Cross/Reb. p.5) Is that MAWC’s**
6 **intent?**

7 A. No. MAWC believes that because of the nature of the Company’s interactions with the
8 targeted customers, the process identified represents an agreement by those customers that
9 decide not to opt-out. If a customer comes to a different conclusion, they may terminate
10 participation in paperless billing at any time.

11 **Q. PLEASE SUMMARIZE YOUR POSITION ON THE PAPERLESS BILLING**
12 **PROPOSAL.**

13 A. As stated in Company witness Carlson’s Direct Testimony, the paperless billing program

¹¹ Due to the conversion of customers to paperless billing, the percentage of customers who completed the survey who received a paper bill dropped from 47% pre-conversion to 36% six months post-conversion, and then increased slightly to 43% in the period 7-12 months post conversion.

1 provides many benefits to customers, cost savings, faster delivery of bill, a more secure
2 method of bill delivery, reduction of environmental impact, and increase in customer
3 satisfaction etc. and should be approved, especially in an era of increasing postage charges
4 and proposed service cuts in Missouri. MAWC's affiliates have successfully implemented
5 paperless billing proposals in other states. The Company can leverage this knowledge to
6 successfully implement this program in Missouri. MAWC will give customers ample
7 opportunity to opt out of the program prior to conversion and is willing to adjust its
8 communication messaging to clearly describe the change that is taking place.

9 **V. CREDIT CARD FEE MESSAGING**

10 **Q. Staff witness Thomason indicates that based on certain customer comments from the**
11 **MAWC's Web Intercept Survey, some customers may have a misunderstanding in**
12 **regard to treatment of credit card fees. How are credit card fees associated with**
13 **customer payments treated?**

14 **A.** As a result of orders in Commission Case No. WR-2020-0344, MAWC incorporates
15 credit/debit card fee payment into its cost of service.

16 **Q. Mr. Thomason hypothesizes that the perceived misunderstanding may be a result of**
17 **messaging on MyWater informing customers that "a +\$1.95 Service Fee may apply"**
18 **for electronic check and credit/debit card payment types. Is that message still a part**
19 **of MyWater and, if so, what is its purpose?**

20 **A.** Yes, this messaging is a part of MyWater since some of MAWC's affiliates charge the
21 customers a fee to pay by credit/debit card.

22 **Q. STAFF RECOMMENDS ON PAGE 29 OF THOMASON'S DIRECT/REBUTTAL**

1 **TESTIMONY THAT MAWC MAKE IMPROVEMENTS TO ITS WEBSITE AND**
2 **MYWATER PORTAL. DO YOU AGREE WITH THIS RECOMMENDATION?**

3 A. Yes, MAWC reviews customer feedback from surveys and continuously seeks to make
4 enhancements to the website and MyWater portal to improve the customer experience.
5 MAWC is reviewing Staff’s recommendation related to credit card fees in conjunction with
6 customer feedback to determine which enhancements will be made to MyWater.

7 **VI. CUSTOMER COMPLAINT AND MYWATER**

8 **Q. IN ADDITION TO STAFF’S CONCERN WITH THE MYWATER PORTAL, OPC**
9 **WITNESS GEOFF MARKE DISCUSSED PROBLEMS A SPECIFIC CUSTOMER,**
10 **MR. JIM MORIARTY, WAS HAVING WITH REVIEWING HIS USAGE IN**
11 **MYWATER. ¹² ARE YOU FAMILIAR WITH THAT COMPLAINT?**

12 A. I am familiar with the complaint, and it is my understanding that since the time Dr. Marke
13 filed his Cross-Rebuttal Testimony in this case, Mr. Moriarty has filed a formal complaint
14 against MAWC with the Missouri Public Service Commission regarding this issue. That
15 complaint was assigned Commission Case No. WC-2025-0204. As such, MAWC’s
16 investigation into this matter is ongoing and the confidentiality of customer information is
17 a priority of the Company. As a result, the Company does not believe the rate case is the
18 appropriate venue for this discussion. While MAWC will specifically address the
19 allegations within the complaint in its response to this complaint, I will summarize the
20 issue generally and the steps MAWC is taking to resolve the issue in my testimony.

21 **Q. GENERALLY, WHAT ARE THE CUSTOMER’S CONCERNS WITH READING**

¹² Marke C-RT, pp. 2-3.

1 **HIS USAGE IN MYWATER?**

2 A. In the draft complaint, he expresses concern about the revisions he sees to his daily usage
3 when he accesses MyWater.¹³ He is concerned, based off his review of usage, that daily
4 water consumption information changes regularly when reviewing his daily usage history
5 in MyWater on different days.

6 **Q. HOW CAN A CUSTOMER REVIEW THEIR USAGE IN MYWATER?**

7 A. A customer with an AMI meter can review their daily usage history over the last 30 days.

8 **Q. IS MYWATER USED FOR THE PURPOSE OF CREATING CUSTOMER BILLS?**

9 A. No. MyWater is not billing software. Thus, the usage display on MyWater is different
10 from the system the Company uses to bill its customers, and a display error for usage in
11 MyWater has no impact to customer billing.

12 **Q. HAS THE COMPANY IDENTIFIED REASONS WHY A CUSTOMER’S USAGE**
13 **MAY APPEAR TO CHANGE IN THE MYWATER USAGE HISTORY REPORT?**

14 A. Yes, the Company has identified two scenarios where usage would be adjusted in
15 MyWater. One reason that usage may be adjusted within MyWater is due to the variability
16 in which MyWater receives the usage information from the meter. Some AMI meters have
17 multiple readings per hour, though the Company does not always receive AMI readings in
18 the exact order they are completed. It may take a period of time, perhaps days, for the
19 Company to receive all of the AMI readings for a particular day. To calculate daily usage,
20 the Company uses the meter reads closest to 12 am Greenwich Mean Time over two
21 consecutive days. Since meter data rolls in over a period of days from the AMI provider to

¹³ Marke DT/RT, Schedules GM-1 and GM-2.

1 the MyWater portal, a meter read closer to 12 am Greenwich Mean Time may become
2 available a few days after the initial daily usage is calculated. If this occurs, then the daily
3 usage report is adjusted to more accurately reflect the customer's daily consumption based
4 on the closer read to 12 am Greenwich Mean Time.

5 Another reason the usage may be adjusted on MyWater relates to the time zone of the
6 customer. The report available to customers in MyWater is calculated on a rolling window
7 of time based on the customer's local time zone. MAWC customers are located in the
8 Central Time Zone. As mentioned above, the Company's daily meter data is sent based
9 upon Greenwich Mean Time, which has a six-hour difference from the Central Time Zone.
10 As a result of the time zone differences between the meter data and the logic used in the
11 rolling window to calculate usage, the oldest day of usage is calculated using only 18 hours
12 of usage. As a result, six hours of usage is missing, which is the difference between the two
13 time zones, and the customer sees lower consumption on the last day of the report than
14 what was previously recorded.

15 **Q. DOES THE COMPANY HAVE A PLAN TO ADDRESS THESE ISSUES?**

16 A. Yes. The Company is also in the process of updating the calculation to address the
17 discrepancy with the last day of the report. The Company anticipates it will implement a
18 change to MyWater to address the time zone issue during the first quarter of
19 2025. Additionally, MAWC will be looking at whether changes to the presentation of this
20 information in MyWater could aid in its understanding for customers.

21 **Q. WHAT IS DR. MARKE'S RECOMMENDATION TO THE COMMISSION BASED**
22 **ON THIS CUSTOMER COMPLAINT?**

23 A. Dr. Marke proposes a disallowance based on a single customer complaint that has not been

1 fully investigated let alone adjudicated. Company witness Brian LaGrand addresses Dr.
2 Marke's proposed disallowance in his Rebuttal/Surrebuttal/Sur-Surrebuttal Testimony.

3 **Q. Does this conclude your Rebuttal/Surrebuttal/Sur-Surrebuttal Testimony?**

4 **A. Yes.**