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Glasgow Direct
File No. WR-2023-0006

Exhibit No.:
Issue(s): Customer Service
Witness: Scott J. Glasgow
Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony
Case No.: WR-2023-0006
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MISSOURI PUBLIC SERVICE COMMISSION
FINANCIAL AND BUSINESS ANALYSIS DIVISION
CUSTOMER EXPERIENCE DEPARTMENT

DIRECT TESTIMONY
Cost of Service
OF
SCOTT GLASGOW

CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.

CASE NO. WR-2023-0006

Jefferson City, Missouri
May 2023

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**TABLE OF CONTENTS OF
DIRECT TESTIMONY OF
SCOTT J. GLASGOW
CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.
CASE NO. WR-2023-0006**

EXECUTIVE SUMMARY2
COMPLAINT DOCUMENTATION2
QUARTERLY MEETINGS6
CUSTOMER OPINION SURVEYS8
ADDITIONAL REPORTING9

1 In 1995, I graduated from the University of Missouri-St. Louis with a Bachelor of
2 General Studies degree.

3 Q. Have you previously filed testimony before the Commission?

4 A. Yes, attached as Schedule SJG-d1 is a list of cases before the Commission in
5 which I provided testimony, Staff recommendations, or significant analysis.

6 EXECUTIVE SUMMARY

7 Q. What is the purpose of your direct testimony?

8 A. The purpose of my testimony is to address complaint documentation required by
9 Commission rule. I will also recommend Confluence Rivers Utility Operating Company, Inc.
10 (“Confluence”) and the Staff of the Commission’s Customer Experience Department (“CXD”)
11 meet on a quarterly basis. I will then address Confluence’s need to look into implementing
12 customer opinion surveys. Finally, I will recommend Confluence add additional call center
13 reporting to the existing call center reporting.

14 COMPLAINT DOCUMENTATION

15 Q. Did CXD Staff have recommendations in the last Confluence rate case
16 (WR-2020-0053)?

17 A. A few. One in particular was the practice of ensuring all customer complaints are
18 documented according to Commission rule 20 CSR 4240-13.040(5), which states:

19 *A utility shall maintain records on its customers for at least two (2) years which*
20 *contain all information concerning ... (B) The number and general description of*
21 *complaints registered with the utility; ...*

1 CXD recommended, and the Commission ordered, that Confluence comply with the
2 Commission rule concerning complaint documentation. The recommendation that the
3 Commission ordered was:

4 *Develop and implement a process to ensure all customer complaints received by*
5 *Company personnel are documented and maintained for at least two (2) years.*
6 *Documentation shall adhere to Commission Rule 20 CSR 4240-13.040 and include the*
7 *customer name, address, nature of the complaint, date of occurrence, as well as an*
8 *explanation of what the Company has done to address the complaint. This*
9 *recommendation should be completed within thirty (30) days of the effective date of the*
10 *Commission order.*¹

11 Q. Was Confluence able to provide a complaint log to Staff during the last rate case?

12 A. A partial one. At the time of the last rate case, Confluence stated they were
13 unaware of the complaint documentation rule but they developed a manual documentation
14 process to document when a complaint is received. Confluence produced an example of
15 documentation consisting of complaints from the Attorney General. Confluence stated that in the
16 next month they were switching billing systems from Munibilling to Starnik which would allow
17 every call to be categorized and would allow them to have a single source for data.

18 Q. Has Staff requested a list of documented complaints and has Confluence been able
19 to provide Staff with complete complaint documentation?

20 A. Staff asked, through discovery in this rate case, for a log of customer complaints
21 from October 2019 through January 2023.² Confluence responded with a list of complaints

¹ WR-2020-0053, 4/8/2020, Order Approving Unanimous Disposition Agreement, Attachment D.

² Staff Data Request 0244.

1 starting in July 2021 through March 2023. Confluence stated they could not provide further data
2 due to switching billing systems from Starnik to Muni-Link.

3 Q. Does Staff believe this is a complete complaint log that would comply with the
4 Commission rule?

5 A. No. For example, from January 2023 through March of 2023, Confluence
6 documented two complaints that were filed in 2023. Staff researched the complaints and both
7 complaints can be found in the PSC’s Electronic Filing and Information System (“EFIS”),
8 although one complaint is from 2022. A quick search in EFIS produced three additional informal
9 complaints in 2023 that were not documented on the log provided to Staff.

10 Q. Does the rule state that the documentation of complaints is only for complaints
11 that come through the PSC?

12 A. No. The rule requires the utility maintain records on its customers for at least
13 two years which contain the number and general description of complaints registered with the
14 utility. The rule does not specify that a utility maintain records of complaints from only the PSC
15 but all complaints no matter where they originate.

16 The complaint log that Confluence provided in this case had a total of 23 complaints
17 registered from July 2021 through March 2023. The partial complaint log from the last rate case
18 had ten (10) complaints in January 2020 from the Attorney General alone. That log was before
19 Central States Water Resources³ (“CSWR”) merged all its Missouri properties with Confluence.

20 Staff has concerns that the documentation provided in this rate case does not contain all
21 the complaints registered with Confluence. Staff sent a follow-up data request for Confluence to
22 supply all complaints from all avenues including but not limited to Attorney General’s Office,

³ CSWR is the parent company to Confluence. CSWR merged all Missouri properties in WM-2021-0412

1 Better Business Bureau, Department of Natural Resources and government officials.⁴ The
2 response to the data request is still missing complaints that were registered via the Commission,⁵
3 and it is unclear if the documentation contains registered complaints from all avenues.

4 Q. Did the WR-2020-0053 Commission order, mentioned above, have additional
5 items that should be documented concerning customer complaints beyond the requirements of
6 Commission rule 20 CSR 4240-13.040?

7 A. Yes. The Commission ordered that documentation should include, “...*the*
8 *customer name, address, nature of the complaint, date of occurrence, as well as an explanation*
9 *of what the Company has done to address the complaint. This recommendation should be*
10 *completed within thirty (30) days of the effective date of the Commission order.*”

11 Q. Did the list of customer complaints provided during this rate case contain all of
12 the information required in the Commission order?

13 A. Besides Staff’s concern that this is not a complete list of complaints registered
14 with Confluence, the documentation did not contain what was done to address the complaint,
15 only whether a work order was ordered. In the supplemental response to the same data request,
16 Confluence has added a resolution column.

17 Q. What improvements does Staff recommend concerning complaint documentation
18 for Confluence?

19 A. Confluence needs to develop a process to comply with the Commission rule in
20 20 CSR 4240-13.040 and the Commission order mentioned above in WR-2020-0053.

⁴ Staff Data Request No. 0244.1.

⁵ Registered complaints with the Commission (not an exhaustive list): Informal Complaints C202300738 filed 3/3/2023, C202300510 filed 12/13/2022, and C202200946 filed 6/21/2022.

1 QUARTERLY MEETINGS

2 Q. Why does Staff believe meeting regularly with utilities is important?

3 A. First and foremost, having a regularly scheduled meeting between the utility and
4 Staff promotes communication which benefits all parties. It allows for discussion of any changes
5 that may have occurred with either party during the last quarter or any changes that are planned
6 in the future. Having regular meetings gives the opportunity for planned follow-up on any subject
7 including performance, Commission orders or open discussion items.

8 Q. Have there been concerns with the communication between CXD and
9 Confluence?

10 A. Yes. For example, during Confluence's last rate case, Staff found out through data
11 requests that Confluence was changing billing systems from Munibilling to Starnik. Again in
12 this case, because of data requests responses, Staff found out Starnik was no longer used as its
13 billing system and that instead, Confluence is now utilizing Muni-Link as its billing system.

14 Q. Is changing the billing system a big operational change for a utility?

15 A. Yes, it is. Since a billing system is the main tool for utilities to manage customer
16 information and billing functions, it is a big operational change. There can be conversion issues
17 with the customer data including history, usage and rate schedules to name a few. There can be
18 learning curves for utility personnel and customers. A new billing system may implement
19 changes to a customer's billing appearance and content. Also, a new billing system might not
20 have the same capabilities as the new system or vice versa which requires additional education.

21 Q. Were there issues with the conversion from Munibilling to Starnik or from Starnik
22 to Muni-Link?

1 A. Yes, and Staff was only made aware of this through data requests in this rate case.
2 Besides having issues retrieving water usage data from Starnik, Confluence could not completely
3 document customer complaints without using a manual process. Starnik was touted as a billing
4 system to allow for better documentation. When Confluence stopped using Starnik and decided
5 to use Muni-Link instead, some data was no longer available. This is just one small issue that can
6 happen when changing billing systems. Staff has reached out to Confluence for a more complete
7 list of what issues occurred due to changing billing systems.

8 Q. Why should Confluence proactively communicate operational changes to Staff?

9 A. Customers, as well as government officials, reach out to Staff for numerous
10 reasons, and keeping Staff informed about operational changes or any potential interruptions can
11 help Staff relay what might be happening with a utility. Also, Staff can provide guidance as it
12 relates to Commission rules or orders.

13 Q. What kind of information should a utility proactively communicate with
14 CXD Staff?

15 A. Some examples of operational changes that should be communicated include, but
16 are not limited to: customer contact center changes, other customer service functions, change in
17 call center technology, change in outsourcing call centers or bringing call center duties in-house,
18 and substantial changes to the billing process as it is currently performed.

19 Additionally, Staff has learned through a data request that Confluence has hired a firm to
20 complete a full operational assessment of the outsourced call center operations as well as an audit
21 of its current billing processes and its customer experience team.⁶ Staff recommends that

⁶ Staff Data Request No. 0168.

1 Confluence share the firm's full evaluation with CXD Staff within 30 days of Confluence
2 receiving the evaluation.

3 Q. In the past, has the Commission ordered utilities to meet with Staff on a periodic
4 basis to discuss performance and/or changes to current business operations?

5 A. Yes. There are several examples of the Commission ordering gas, electric and
6 water utilities to meet with Staff regularly.⁷

7 Q. What is Staff's recommendation?

8 A. Staff recommends Confluence should meet with Staff CXD personnel on a
9 quarterly basis or as Staff deems necessary. These meetings should begin ninety days after the
10 implementation of newly authorized rates in this case. Outside of these meetings, Confluence
11 should communicate to CXD Staff concerning operational changes as mentioned above.

12 CUSTOMER OPINION SURVEYS

13 Q. Does Confluence currently utilize any type of customer opinion surveys to give
14 Confluence feedback on the services they are providing its customers?

15 A. According to Confluence, there is no such data available.

16 Q. Can opinion surveys be a useful tool to a utility?

17 A. Surveys can be a very useful tool. Customer opinion surveys can provide a utility
18 with valuable information such as measuring customer needs and how they feel about a company,
19 products and services. Customer surveys can help indicate how a company performs customer
20 service and measure operational efficiency. Surveys can also be beneficial for benchmarking
21 purposes to see growth or areas of improvement over time.

⁷ Case No. EM-2007-0374, Report and Order Page 282 - 283, Case No. ER-2016-0213, Report and Order Page 4, GM-2013-0254 Order Approving Unanimous Stipulation and Agreement, Page 3.

1 Q. Are opinion surveys always the best solution to gather feedback?

2 A. Not always. In the instances of many smaller water and sewer companies,
3 companies can get real-time feedback on day-to-day business practices due to the proximity of
4 the owner and the customer. With larger companies, it becomes close to impossible to get that
5 type of feedback.

6 Q. Is Confluence a small⁸ water and sewer company?

7 A. No. Although Confluence started out small in Missouri, they have proven to be
8 aggressive in acquiring water and sewer companies and have grown rapidly. According to
9 Confluence's testimony, Confluence currently has approximately 4400 water/4,600 sewer
10 customers and CSWR currently operates in twelve states.⁹

11 Q. What kind of methods are there to solicit customer opinions?

12 A. There are several methods a company can use to solicit customer feedback
13 including interviews, focus groups, emails, social media, text feedback and website analytics to
14 name a few.

15 Q. What is Staff's recommendation concerning Customer opinion surveys?

16 A. Staff recommends that Confluence should examine methods available to solicit
17 the opinions of its customers regarding the service that they are receiving. Staff also recommends
18 that Confluence inform CXD Staff what methods were examined and how Confluence plans to
19 solicit the opinions of its customers in the future.

20 ADDITIONAL REPORTING

21 Q. Is Confluence required to provide Staff with call center performance metrics?

⁸ Small is not used in this sentence as a legal definition of the size of a utility as defined in Commission Rule 20 CSR 4240 chapter 10.

⁹ Josiah Cox's Direct Testimony, page 4.

1 A. Yes. As a result of the Commission’s Order in WM-2021-0412, Confluence began
2 providing call center performance metrics to Staff on a monthly basis beginning January 2022.
3 This call center data includes the following items: calls offered to representatives, calls answered,
4 abandoned call rate (“ACR”), average speed of answer (“ASA”), and the total number of
5 customer service representatives employed by Confluence’s third party vendor for customer
6 service calls.

7 Q. Is the reporting of call center performance metrics consistent with other investor
8 owned utilities in Missouri?

9 A. Yes, other major utilities have also been ordered by the Commission to
10 provide metrics to Staff. As systems change over time, the Staff and companies have agreed
11 to report additional specific indicators to reflect data that is pertinent and reflective of
12 customer service performance.

13 Q. Why is the reporting of call center performance metrics helpful?

14 A. The information reported is helpful in determining trends, such as if there is a
15 deterioration of service in call center operations. For example performance reports can show if
16 customers are waiting a long time to speak to a customer service representative or if a utility had
17 a large decline in staffing. Staff could then follow-up and have discussions with the Company to
18 determine the causes and actions taken to correct the problem.

19 Q. Does Staff have any issues with the data that Confluence has been providing
20 to CXD?

21 A. No. Confluence is in compliance with the Commission order concerning the call
22 center information it is providing to Staff; however, there are additional call center metrics Staff

1 believes should be added to the reporting requirement to ensure a more complete view of the
2 service provided by the call center.

3 Q. What additional call center metrics do Staff recommend be added to the monthly
4 reporting provided to CXD?

5 A. Besides continuing to provide the metrics Confluence already provides on a
6 monthly basis, the additional information and metrics should include:

- 7 1. Total calls received at the call center
- 8 2. Calls handled by an interactive voice response system (“IVR”)
9 or an intelligent virtual agent (“IVA”)
- 10 3. Service Level (with the definition of how the service level was
11 determined)
- 12 4. List of CSWR employees dedicated to customer service along
13 with their titles and responsibilities

14 Q. Does this conclude your direct testimony?

15 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

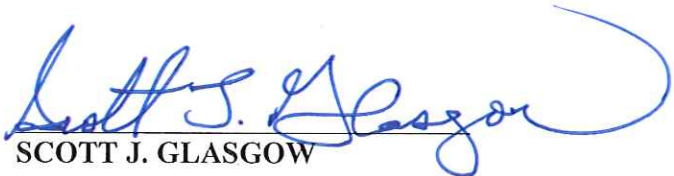
In the Matter of Confluence Rivers Utility)
Operating Company, Inc.'s Request for) Case No. WR-2023-0006
Authority to Implement a General Rate)
Increase for Water Service and Sewer)
Service Provided in Missouri Service Areas)

AFFIDAVIT OF SCOTT J. GLASGOW

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SCOTT J. GLASGOW and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of Scott J. Glasgow*; and that the same is true and correct according to his best knowledge and belief.

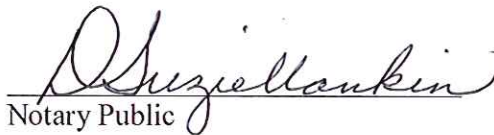
Further the Affiant sayeth not.


SCOTT J. GLASGOW

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 23rd day of May 2023.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070


Notary Public

Scott J. Glasgow

Prior Work Experience and Education

I am a Senior Research/Data Analyst in the Customer Experience Department. I have been employed by the Commission since 2010 and worked in several areas including Consumer Services, Telephone, Electrical and Management Services. In my previous experience, I worked five years as a Customer Service Manager for Charter Communications with responsibilities managing multiple areas of the Company's Call Center Operations. Prior to Charter Communications I worked as a Team Manager for Southwestern Bell, d/b/a AT&T. Prior to the AT&T position, I worked as a Site Director for a telemarketing call center, managing all aspects of the center's day-to-day operations. In 1995, I graduated from the University of Missouri-St. Louis with a Bachelor of General Studies degree.

As an analyst for the Commission, I have participated in and conducted customer service and business office operations reviews. I have researched and managed a number of formal customer complaints. I have prepared and reviewed audit and investigative reports at the Commission. I have participated in water and sewer case staff recommendations and reviewed tariffs. I have previously provided testimony before the Commission and have performed Case Management duties.

The following is a listing of cases before the Commission in which I provided testimony, Staff recommendation or significant analysis.

Scott J. Glasgow

Case Participation

The following is a listing of cases before the Commission in which I provided testimony, Staff recommendation or significant analysis:

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
1/31/2023	WC-2021-0227	Missouri American Water – Formal Complaint	Staff Report
11/18/2022	WA-2023-0003	Confluence Rivers Utility Company – Acquisition	Staff Recommendation
11/10/2022	WA-2023-0026	Confluence Rivers Utility Company – Acquisition	Staff Recommendation
3/8/2022 And 7/13/2022	ER-2022-0129 ER-2022-0130	Evergy Metro Evergy Missouri West	Direct And Rebuttal
1/24/2022	GR-2021-0320	The Empire District Gas Company – Rate Case	Direct
12/20/2021 And 10/29/2021	ER-2021-0312	The Empire District Electric Company – Rate Case	Rebuttal and Staff Report - Cost of Service
12/2/2021	WO-2021-0428	Missouri American Water Company - Petition of Missouri-American Water Company for Approval to Establish a Water and Sewer Infrastructure Rate Adjustment ("WSIRA")	Staff Recommendation
10/1/2021	WA-2021-0376	Missouri American Water Company - Certificate of Convenience and Necessity	Staff Recommendation
9/14/2021	WM-2021-0412 SM-2021-0413	Hillcrest Utility Operating Company, Inc., Indian Hills Utility Operating Company, Inc. Elm Hills Utility Operating Company, Inc., Confluence Rivers Utility Operating Company, Inc., Osage Utility Operating Company, Inc. – Merger	Staff Recommendation
7/15/2021	GC-2021-0395	Empire District Gas Company – Formal Complaint	Staff Report
06/17/2021	WC-2021-0251	Missouri American Water Company – Formal Complaint	Staff Report

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
4/30/2021	AO-2021-0264	Cause of the February 2021 Cold Weather Event and its Impact on Investor Owned Utilities	Staff Report
4/16/2021	WA-2020-0397	Liberty Utilities - Certificate of Convenience and Necessity	Staff Memorandum
11/24/2020	WR-2020-0344	Missouri American Water Company – Rate Case	Staff Report
9/9/2020	WR-2020-0275	Elm Hills Utility Operating Company, Inc. – Rate Case	Non-unanimous Disposition Agreement
8/20/2020	WC-2020-0407	Missouri American Water Company – Formal Complaint	Staff Report
8/4/2020	WR-2020-0264	Raytown Water Company – Rate Case	Unanimous Disposition Agreement
4/20/2020	GC-2020-0201	Spire Missouri Inc., d/b/a Spire – Formal Complaint	Staff Report
3/26/2020	WC-2020-0194	Missouri American Water Company – Formal Complaint	Staff Report
3/17/2020	SM-2020-0146	Elm Hills Utility Operations Company / Central Rivers Wastewater Utilities – Acquisition	Staff Recommendation
2/10/2020	WR-2020-0053	Confluence Rivers Utility Company – Rate Case	Unanimous Agreement Regarding Disposition
9/4/2019	WA-2019-0185	Osage Utility Operating Company, Inc. – Acquisition	Surrebuttal
6/10/2019	WA-2019-0036	Liberty Utilities / Franklin County Water Company - Acquisition	Staff Report and Recommendation
5/31/2019	WA-2019-0299	Confluence Rivers Utility Operating Company - Acquisition	Staff Memorandum
5/17/2018	GC-2018-0159	Spire Missouri – Formal Complaint	Staff Report
1/22/2018	WM-2018-0104	Missouri-American Water / Spokane Highlands - Acquisition	Staff Recommendation
12/28/2017	WC-2018-0124	Missouri-American Water – Formal Complaint	Staff Recommendation

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
11/30/2017	EO-2015-0055	Ameren Missouri's 2nd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA - Flex Pay Application Filed 11/30/2017	Case Coordinator
11/9/2017	SA-2018-0068	Missouri-American Water - Certificate of Convenience and Necessity	Staff Recommendation
9/5/2017	SA-2018-0019	Missouri-American Water - Certificate of Convenience and Necessity	Staff Recommendation
7/5/2017	WR-2017-0110 and SR-2017-0109	Terre Du lac Utilities – Rate Case	Stipulation and Agreement
3/31/2017	WO-2017-0012	Missouri-American Water - Investigation	Staff Memorandum
3/17/2017	WO-2017-0191	Missouri-American Water / Audrain Public Water District No. 1 - Territorial Agreement	Staff Recommendation
3/13/2017	WA-2017-0181 and SA-2017-0182	Missouri-American Water - Certificate of Convenience and Necessity	Staff Recommendation
5/6/2016	WR-2016-0109 and SR-2016-0110	Roy-L Utilities – Rate Case	Disposition
2/22/2016	WM-2016-0169	Missouri-American Water / Woodland Manor - Acquisition	Staff Recommendation
1/29/2016	EC-2015-0309	Kansas City Power & Light Company / KCP&L Greater Missouri Operations Company -- Formal Complaint	Surrebuttal
12/31/2015	WC-2016-0113	Missouri-American Water – Formal Complaint	Staff Memorandum
1/29/2015	EC-2015-0093	KCP&L Greater Missouri Operations – Formal Complaint	Staff Recommendation
6/27/2014	EC-2014-0334	Empire District Electric Company – Formal Complaint	Staff Recommendation
4/18/2013	TC-2012-0394	CenturyLink (Embarq Missouri) – Formal Complaint	Staff Memorandum
11/12/2012	CA-2013-0271	New Horizons Communications Corp. - Application for Certificate	Staff Recommendation