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May 24, 2022

**BY E-FILING**

Mr. Adam Teitzman, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 20220067-GU: Petition for rate increase by Florida Public Utilities Company, Florida Division of Chesapeake Utilities Corporation, Florida Public Utilities Company - Fort Meade, and Florida Public Utilities Company - Indiantown Division.**

Dear Mr. Teitzman:

Attached, for electronic filing, please find the Testimony and Exhibits KP-1 through KP-3 of Kelley Parmer.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

(Document 8 of 27)

Sincerely,

A handwritten signature in black ink, appearing to read 'Beth Keating', written over a horizontal line.

Beth Keating  
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1 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

2  
3 Docket No. 20220067-GU: Petition for rate increase by Florida Public Utilities Company,  
4 Florida Division of Chesapeake Utilities Corporation, Florida Public Utilities Company -  
5 Fort Meade, and Florida Public Utilities Company - Indiantown Division.

6 Prepared Direct Testimony of Kelley Parmer

7 Date of Filing: May 24, 2022

8  
9 **Q. Please state your name and business address.**

10 A. My name is Kelley Parmer. My business address is 500 Energy Lane Suite 100  
11 Dover, DE 19901.

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

13 A. I am employed by Chesapeake Utilities Corporation as the Assistant Vice President  
14 of Customer Care.

15 **Q. Please describe your educational background and professional experience.**

16 A. I hold a Bachelor of Science degree in Business Management from the University of  
17 Maryland Global Campus. I have worked in the regulated gas and electric utility  
18 industry supporting customer service in various capacities for 21 years. I have been  
19 employed with Chesapeake Utilities for 6 years beginning my career here as a  
20 Director, Planning & Analysis, a role in which I was charged with creating  
21 procedures for forecasting & staffing, metric creation and tracking, and support of  
22 customer facing technologies such as the implementation of the Cisco phone system.  
23 In 2018, my responsibilities were expanded to include the contact center functions  
24 with particular focus on inbound contacts and walk-in offices in Delaware,  
25 Maryland, and Florida. In September 2020, I accepted the role of Assistant Vice  
26 President, Customer Care.

1 Prior to Chesapeake Utilities, I worked for Pepco Holdings, Inc. for 15 years. I  
2 began in a Customer Service Representative role in 2000 at the time of a billing  
3 system implementation failure. In this role, I provided over the phone and face to  
4 face support for all types of customer inquiries. After several years, I moved into a  
5 supervisory position overseeing a team of 12-16 agents. Then, I held a Senior  
6 Analyst role within the Workforce Management team supporting contact center  
7 forecasting and staffing, metric tracking and reporting, support of data requests from  
8 regulatory bodies, storm and crisis staffing, and contact center system administration.  
9 As of 2012, I held the role of Call Center Manager supporting the organization  
10 through a Systems, Applications, and Products billing system replacement. In this  
11 role, I was responsible for management of the contact centers, our energy  
12 conservation agents, and our vendor partners.

13 **Q. Please describe your current responsibilities.**

14 A. I am currently responsible for all customer care functions for Chesapeake Utilities  
15 Corporation's regulated subsidiaries, including for Florida Public Utilities Company.  
16 My areas of responsibility include, among other things, billing, credit and  
17 collections, contact centers, payment processing, as well as all associated support  
18 functions that impact the customer service experience of our customers.

19 **Q. How will you refer to the Company?**

20 A. For purposes of clarity and ease of reference, I'd like to explain how I will refer to  
21 the various Florida business entities under the Chesapeake Utilities Corporation  
22 umbrella. When referring to the Florida LDC business units as a whole; i.e., Florida  
23 Public Utilities Company (Natural Gas Division), Florida Public Utilities Company-

1 Fort Meade, Florida Public Utilities Company-Indiantown Division, and the Florida  
2 Division of Chesapeake Utilities Corporation d/b/a Central Florida Gas, I will refer  
3 to these entities jointly as “FPUC” or “the Company”.

4 When referring to Chesapeake Utilities Corporation, the parent company, I will refer  
5 to it as the “CUC” or the “Corporation.”

6 **Q. Have you filed testimony before the Florida Public Service Commission in prior**  
7 **cases?**

8 A. No.

9 **Q. Have you previously provided testimony before other regulatory bodies?**

10 A. No.

11 **Q. What is the purpose of your testimony in this proceeding?**

12 A. I will provide an overview of the Customer Care organizational changes that have  
13 occurred since the acquisition of FPUC by CUC. Next, I will discuss the  
14 improvements implemented by Customer Care to enhance the customer experience  
15 with our Local Distribution Companies (“LDCs”) in Florida. Next, I will discuss  
16 the impacts of, and Customer Care’s response to, the COVID-19 Pandemic  
17 (“COVID”). I will conclude by discussing new and enhanced customer programs  
18 being considered by Customer Care.

19 **Q. Do you have any exhibits to which you will refer in your testimony?**

20 A. Yes. With my testimony, I am providing the following Exhibit:

21 KP-1 - The Customer Care Communications Policy

22 KP-2 – The Red Flag Policy

23

1 **Q. Are you sponsoring any Minimum Filing Requirements (“MFR”)s in this case?**

2 A. Yes. Attached is Exhibit KP-3 which reflects MFRs that I have co-sponsored.

3

4

**Organizational Overview**

5 **Q. Please explain the reorganization of the Customer Care department you**  
6 **mentioned above.**

7 A. CUC is always looking for ways to enhance the customer experience. Our most  
8 recent core initiative in this regard is the reorganization of our Customer Care  
9 division serving Florida, Delaware, and Maryland to drive process improvements  
10 and standardization.

11 For FPUC in particular, this represents a significant change in how Customer Care  
12 operates. Specifically, prior to its acquisition by CUC, FPUC operated somewhat  
13 like a “mom-and-pop” type business. For instance, Customer Care representatives  
14 were responsible for handling all aspects of customer service, while also holding  
15 significant administrative responsibilities for the office. Customer Care support  
16 existed in the West Palm Beach and DeBary local offices driving resource  
17 inefficiency and a limited commonality in the level of service provided due to a lack  
18 of standardization. Throughout FPUC, there was no system that routed calls based  
19 on the customer need, provided any tracking or reporting, nor any on-hold  
20 capabilities. As a result, Customer Care did not have key metrics upon which they  
21 could determine current performance levels or make steps to improve. Even the  
22 most basic metric of number of calls received was not being tracked. In 2011,  
23 Customer Care was separated into three internal groups that would focus on the

1 specific rolls of front office, back office, and collections. The front office focused on  
2 handling inbound contacts and supporting the business offices. The back office  
3 focused on billing functions including completion of service orders and system  
4 updates. The collections area focused on managing bad debt through a collections  
5 and write-off process. These efforts resulted in significant changes in the contact  
6 center to better distribute calls and workload among all of the customer service  
7 representatives, as well as to track service levels and overall performance. In the  
8 Back Office and Collections teams we were able to build expertise for the required  
9 competencies that helped to streamline and optimize processes.

10

11

### **Customer Experience Improvements**

12

**Q. Please describe the Company's commitment to customer service.**

13

A. FPUC's dedication and commitment to delivery of quality customer service is  
14 paramount. With society's ever-increasing access to information, the Company has  
15 experienced a significant increase in its customers' expectations related to their  
16 overall experience with the Company. Customers care not only about the safety and  
17 reliability of the service they receive, but also about the quality of their interactions  
18 with the Company and Company employees, both on a day-to-day basis and when  
19 the need arises to contact us for support. As such, the Company has responded by  
20 making prudent investments in technology, as well as improvements to our  
21 processes, enabling us to analyze customer interactions and feedback, which is then  
22 incorporated into our continually evolving short and long-term strategies to improve  
23 all aspects of the customer experience, including call handling, website,

1 communication, processes, and procedures. Our customer communication strategy  
2 has evolved to a more proactive approach, as well, in that we communicate pertinent  
3 information to customers regarding areas of interest, such as bill and process changes  
4 and storm preparedness, across multiple channels, such as email and social media.

5 **Q. What types of Customer Care technology improvements has the Company**  
6 **made?**

7 A. We have implemented several technologies to improve the customer's experience  
8 with payment options, when calling into our call center, and foundational technology  
9 to drive efficiencies with staffing models, interaction tracking, and productivity  
10 tracking.

11 **Q. Please provide some specific examples of technology improvements that the**  
12 **Company has made in the customer service area.**

13 A. In 2011, the Company purchased an Avaya phone system, which allowed Customer  
14 Care to begin tracking metrics. This technology enabled Customer Care to transition  
15 to a virtual call center. This meant that a Customer Service Representative working  
16 in our North Florida office could answer a call from a customer anywhere in Florida.  
17 Concurrent to the Avaya system upgrade, the Company implemented a call recording  
18 solution by the name of Verint. This allowed FPUC to start measuring how  
19 effectively we were handling customer inquiries, which helped us gain another  
20 valuable insight into the customer experience, including specific pressure points.  
21 Shortly after these implementations, we created a quality assurance department,  
22 which has now evolved over the past few years into a comprehensive VOC program,  
23 which I will discuss in more detail later in my testimony.

1     **Q.     Would you please elaborate on the benefit to the Company’s customers related**  
2     **to the new telephony systems?**

3     A.     In 2017, FPUC implemented a new phone platform, Cisco, to replace our  
4     unsupported Avaya platform with newer and more robust technology. Cisco allowed  
5     us to leverage additional data points for contact center and individual performance to  
6     enable identification of process improvements and efficiencies as well as creation of  
7     customer options.

8     Another area the Company made improvements to was a redesign of our call flows.  
9     To accomplish this we engaged our customers in focus groups to interact with the  
10    call flows we had in place at that time and the new ones we proposed. We were able  
11    to record via video the feedback that they provided. This feedback was used to  
12    create the final call flows, which included reordering of options, recorded messages  
13    for commonly requested information, expedited connection to our payment  
14    processing platform, and additional options for direct connections to other  
15    departments within the organization. This new phone platform also enabled  
16    deployment of new workforce planning technology, updated call recording and  
17    quality monitoring system, virtual call technology, and deployment of dashboards to  
18    create additional visibility into customer service performance.

19    With the Cisco platform implementation, we were able to deploy several other  
20    technologies that have improved processes and helped us gain insight into how to  
21    improve our customer’s experience. One of these technologies was a new workforce  
22    management system, which we used to track metrics, create capacity planning, and  
23    better match contact center resources to workload. We also upgraded the prior call

1 recording and monitoring solution to a third party company, Eleveo, which not only  
2 provided similar call recording functionality with improved compliance regarding  
3 suppression of confidential personal information but also greatly enhanced our  
4 quality program through utilization of improved forms and ability to identify  
5 additional call details such as sentiment. We added wallboard functionality, which  
6 displays near real-time key performance metrics and the weather, and also has the  
7 ability to display critical messages through the use of a running banner. The  
8 wallboard functionality was available via a screen in every contact center, as well as  
9 a desktop application for those not in a local office. This application provided  
10 needed visibility so any real-time adjustments could be made to improve  
11 performance. Finally, this upgrade enabled the ability to add call back technology  
12 to improve our customers' experience with wait times.

13 **Q. What other advancements has the Company made to support its**  
14 **customers?**

15 A. Since the initial reorganization discussed above, the Company has continued to  
16 identify opportunities to improve the customer experience. For example, in the past  
17 two years, FPUC has focused on breaking down silos across the Customer Care  
18 business units by moving our labor resources under a single manager. This has  
19 allowed us to focus on expanding the resource pool and create a succession plan to  
20 help minimize the potential for business disruptions, and to identify additional  
21 opportunities for process improvements and synergies.

22 **Q. What other steps has the Company taken to improve the customer experience?**

1 A. In 2017, we began development of a program to deploy our Customer Care  
2 Representatives supporting incoming contacts to work remotely from their homes  
3 with our first agent being deployed in the early part of 2018. As a result of COVID,  
4 this remote deployment has been expanded to all Customer Care Representatives  
5 supporting incoming contacts and now also includes those Customer Care Analysts  
6 supporting billing, credit, and similar support functions. Having a remote workforce  
7 enables us to be more agile when responding to customer needs by creating an “on  
8 demand” staff to be used in special events such as storms, safety issues or other  
9 times when call volumes substantially increase. Furthermore, it expands our ability  
10 to recruit talent in other areas outside of the immediate office location.

11 **Q. Has the Company made any other customer experience improvements?**

12 A. Yes. In an effort to respond to increasing customer expectations over the last several  
13 years, FPUC has implemented several more key support functions. One such  
14 function is the Workforce Planning team created in 2016. This team works to align  
15 the Company’s labor resources throughout the day to meet customer demand, tracks  
16 performance metrics, and creates short and long-term mitigation strategies that  
17 support customer facing software such as the call flows/options, call recording, and  
18 on-hold technology. The forecast methodology and data collected by the Workforce  
19 Planning team showed a need to add staff to improve response times and expand into  
20 other contact channels. Additionally, our Customer Experience team has been  
21 expanded to not only monitor agent performance, but to also analyze customer  
22 feedback and reactions to inform initiatives and strategy. Another key support  
23 function we have added is the addition of a training manager. This new role has

1 enabled FPUC to create a robust new hire program and a refresher training program  
2 that is vital to attracting and retaining qualified agents.

3 **Q. Would you please provide some detail on the three additional CSR positions**  
4 **being added to Schedule G2-19f?**

5 A. These additional three CSR positions are critical in helping the Company continue to  
6 meet the increasing expectations of our customers, as well as the continued growth  
7 of the Company's system. We have prudently added these positions in 2022 in an  
8 effort to meet this ongoing demand in the Customer Service areas.

9

10 **Quality of Service**

11 **Q. Please describe what steps the Company has taken to improve efficiency,**  
12 **quality, and effectiveness of interactions between Customer Care and**  
13 **customers?**

14 A. Since the acquisition by CUC, we have dedicated resources to improving our  
15 effectiveness and level of quality for customer interactions extending beyond live  
16 interactions. CUC gained the ability to monitor and evaluate live calls in 2011. This  
17 was an important first step in creation of one of our most critical improvements, our  
18 Voice of the Customer ("VOC") program. The VOC program covers a wide variety  
19 of issues ranging from implementation of quality standards for call handling,  
20 customer feedback, and implementation of customer satisfaction tracking.

21 As mentioned, our customers' expectations and the method in which they interact  
22 with us continue to evolve. As a result, in 2017 we expanded our quality program to  
23 a VOC program. Under the VOC program, we now analyze a customer's interaction

1 with us across all touchpoints. We established transactional surveys to measure  
2 customer sentiment, customer satisfaction, net promoter score, and to capture  
3 unstructured feedback. Net promoter score is a customer loyalty and satisfaction  
4 measure taken from asking customers how likely they are to recommend a company  
5 and/or service. The VOC program also captures feedback received across social  
6 media channels, escalated complaints, call observations, and any other feedback  
7 mechanisms.

8 The program then aggregates all data on a monthly basis to produce an analysis of  
9 successes and opportunities. The Customer Experience team produces actionable  
10 recommendations that are then reviewed for short and/or long-term strategy  
11 initiatives, as well as level of investment. This analysis has driven several  
12 improvements within customer service, among them adoption of a best-in-class call  
13 strategy, improvement of our payment options, reduction of payment fees, and  
14 implementation of call back functionality. This analysis is also a key reason for our  
15 consideration of a new Customer Information System (“CIS”).

16 **Q. Please explain how the VOC aids the development of quality standards for**  
17 **Customer Service.**

18 A. Our VOC program collects customer and employee feedback across all channels.  
19 Our Customer Experience team analyzes the information along with best practices to  
20 develop our quality standards. The quality standards for those in Customer Care  
21 help evaluate both soft skills, such as tone and professionalism, as well as hard skills  
22 related to processing requests completely and accurately.

1 **Q. Would you please provide some examples of how these enhancements have been**  
2 **successful?**

3 A. As a result of our VOC program, we continue to adjust our Customer Care strategy  
4 to meet evolving customer expectations and implement industry best practices. The  
5 program began with refining our call quality standards with an added focus on  
6 enhancing our coaching program. This program has been improved since its initial  
7 implementation to now capture and measure data from multiple touchpoints, such as  
8 surveys, social media, call monitoring, emails, website inquiries, and escalated  
9 complaints. With this data, an analysis can be performed to include a root cause  
10 analysis that helps inform organizational strategies and objectives. As mentioned,  
11 the consideration of an upgrade to our billing and payment system is a direct result of  
12 the feedback we have received. We heard that customers struggled to use the current  
13 system and they were unhappy with the level of fees being assessed. As of January  
14 2022, we were able to reduce the fees making a check payment free if they set up an  
15 account online, while also reducing the one-time payment costs for using a check by  
16 31%. Some customers also told us that they would still like to receive a paper bill  
17 when setting up an online account so we gave back that option. In addition, during  
18 our busy season that occurs between October to April, customers did not want to  
19 wait in queue, so we implemented a call back technology that allows them to keep  
20 their place in line without staying on the line. They receive a call back when an  
21 agent becomes available.

22 We have also leveraged this feedback to greatly enhance our communications during  
23 a severe weather event. We proactively share storm preparation information, as well

1 as key resources in the community. Our social media platforms are utilized more  
2 than ever as we heard that customers first went to these channels to get valuable  
3 information. In addition to social media, our website has gone through a few  
4 redesigns to ensure ease of use from any device by making all sites mobile friendly  
5 We have found that these platforms are the most customer-friendly, proactive means  
6 of keeping our customers informed.

7 **Q. Has the Company been able to measure improvement in customer  
8 communication resulting from these enhancements?**

9 A. Yes. Even with increased customer expectations, the Company has been successful  
10 at lowering the number of complaints. Based on 2013 total complaints of 23 across  
11 all of our Florida LDCs, we have shown a consistent annual reduction of 35% or  
12 better. Over the past nine years, the Company has not received any formal complaint  
13 for FPUC – Indiantown Division, and our FPUC - Fort Meade Division has only  
14 experienced one formal complaint over the past nine years.

15 **Self Service Functionality**

16 **Q. Please discuss the benefit to the Company’s customers resulting from  
17 implementation of third party payment options.**

18 A. Several enhancements to our payment platform have been made over the past ten  
19 years with the most recent functionality being implemented in January 2022. The  
20 payment platform enhancements have focused on ease of customer use and access to  
21 billing and payment information to provide customers a self-service option. One of  
22 these enhancements was the implementation of an electronic billing platform, EZ-  
23 Billing, which has been received well by customers. EZ-Billing allows customers

1 quicker access to their bill, payment options such as auto pay, and to receive their  
2 bill electronically providing an eco-friendlier option. The improvements  
3 implemented in January of this year will provide additional payment options and  
4 notifications, such as text messaging and payment via text. This update provided a  
5 no-fee option for automatic check payments when the customer sets up their account  
6 online. The improvement maintained the one-time payment option using EZ-Pay, at  
7 a reduced fee. Our retail payment network has also been extended which offers  
8 customers an option to pay their bills without a fee when visiting at local merchants.  
9 These new partners include businesses, such as Walmart, as well as smaller entities.

10 **Q. Have your customers embraced these new options?**

11 A. Customers have embraced the EZ-Billing option. Customers tend to prefer either the  
12 online payment option or mailing their payment directly to FPUC, as evidenced by  
13 an enrollment rate of 48.7% for our Florida customers.

14

15 **Customer Communications**

16 **Q. How has the Company improved Company-to-customer communications?**

17 A. FPUC's overall communication programs and methods are constantly evolving to  
18 meet changing needs and to utilize additional contact channels. Customer Care  
19 collaborates with the Company's Strategic Communications team deploying a  
20 comprehensive communication policy, which is included with my testimony as  
21 Exhibit KP-1, to help with continued improvement. The methods by which we keep  
22 the lines of communication open with our customers continues to broaden from  
23 traditional telephone and email to the utilization of social media and our website to

1 provide a variety of options that fit our customer's preferred method of  
2 communication. Particular focus has been given to the utilization of our website to  
3 include banners for immediate and important information, leveraging our telephone  
4 system to share mass messages, and posting of FAQs to our website and social media  
5 channels to help with customer questions. Furthermore, we implemented the ability  
6 to deploy outbound call campaigns to reach customers that may be impacted in a  
7 specific area. We constantly review our social media pages to respond to customer  
8 inquiries but to also measure sentiment and effectiveness of communication. This  
9 has enabled us to identify when more communication may be required and the level  
10 of specificity. During adverse weather, we have been able to communicate with  
11 individuals and communities through our social media channel to offer and deploy  
12 support where appropriate.

13 **Q. Does the Company have a process to communicate directly with individual**  
14 **customers when necessary, such as in an outage situation?**

15 A. Yes. While natural gas systems are not prone to service outages, special care is  
16 taken to communicate and provide additional channels of communication during  
17 weather events. These process enhancements include a personal outreach to  
18 hospitals and nursing care facilities in the event of an extended outage.

19 **Q. What steps has the Company taken to protect customer data given the**  
20 **Company's use of a broader range of communications channels?**

21 A. The Company has updated its internal policies and audits to protect customer data in  
22 a broader range of situations. I have included our "Red Flag" policy as Exhibit KP-2  
23 in my testimony. When we upgraded our call recording system, we implemented

1 pause and resume technology to stop recording when customers provide us  
2 personally identifiable information during the payment process. The automation  
3 identifies when the agent is entering the fields where we would ask for credit card or  
4 banking information and pauses the recording. The automation then recognizes when  
5 the payment process is completed and automatically resumes the recording.

6 When customers utilize our payment platform, it provides a multitude of features to  
7 protect their information. Some examples of this are:

- 8           ▪ When a customer is asked to create an account profile with a unique  
9           username and password. As part of the sign in protection, they are  
10          provided numerous security questions and must choose three to  
11          provide the answers. One of the three questions may be present upon  
12          signing in, or when adding, changing, or deleting information from  
13          their profile.
- 14          ▪ As part of the verification process, the customer will need to check  
15          the box “I’m not a robot”. This security measure will ask them to  
16          verify by clicking on pictures containing specific items. The  
17          customer will continue to click on appropriate pictures until the item  
18          no longer appears in any picture.
- 19          ▪ Customers can also create a Sign-In Seal feature, which provides the  
20          security of having the customer know they are on the official site.  
21          The seal is unique to the customer and is only shown when accessing  
22          the official site.

- 1                   ▪ In this application, customers’ account numbers as well as payment  
2                   information are masked showing only the last 4 digits only.

3                   Within our customer information system, enhancements were made to mask the  
4                   social security number so only the last four digits are shown. In addition, a customer  
5                   service representative can enter the customer’s full social security number or driver’s  
6                   license or opt to use only the last four digits based on the customer’s preference. The  
7                   numbers are automatically masked upon entering. We also implemented procedures  
8                   in case the customer is not comfortable in providing their social security number.

9                   In addition to these measures, FPUC completes identity theft training every year for  
10                  all employees who come into contact with personally identifiable information. This  
11                  training confirms procedures for proper identification of a customer and procedures  
12                  for handling sensitive information. FPUC is also an active member of the Utilities  
13                  United Against Scams (“UUAS”). Each of the participating members have resources  
14                  available in the event of a potential scam whereby our customers are the target of  
15                  scammers and securing ill-gotten payments. This organization has been successful  
16                  in shutting down a number of scam operations.

17   **Q.    Could you please elaborate on the technologies that are used to protect**  
18   **customer personal identifiable information?**

19   A.    As will be discussed in more detail by Company witness Gadgil, CUC uses a variety  
20   of technology and processes to protect systems containing customer Personal  
21   Identifiable Information. Some of those technologies and processes include:

- 22           •       Advanced Endpoint Detection & Response Protection across the enterprise

- 1 • Data Loss Prevention
- 2 • Policies around data handling and protection
- 3 • A Third Party Risk Program focused on vendor vetting, selection and risk
- 4 ranking, ensuring CUC's partners don't raise our risk profile
- 5 • A mature Vulnerability Management program, utilizing National Institute of
- 6 Standards and Technology "NIST" approved scanners, which perform
- 7 weekly scans to identify any new vulnerabilities. NIST is a non-regulated
- 8 federal agency that develops and publicizes security compliance standards
- 9 that are mandated under the Federal Information Security Management Act
- 10 and other regulations.

11

12

### COVID-19 Pandemic Response

13 **Q. Would you please summarize the impact to customers related to the COVID-19**  
14 **Pandemic?**

15 A. Customer impacts from the COVID-19 Pandemic have been, and still are,  
16 significant. In response to the economic challenges for our customers, the Company  
17 took several proactive measures to help customers through this unprecedented time.  
18 FPUC initiated outreach to customers to ease their concerns regarding bill payments  
19 and potential service interruptions. In May 2020, the Company proactively  
20 suspended disconnects for non-payment and instituted flexible, extended payment  
21 plan options. We leveraged existing relationships with support agencies, such as Our  
22 Lady Star of the Sea Catholic Church and established new relationships in order to  
23 connect customers with financial support. These programs were communicated

1 through multiple channels to reach as many customers as possible. These include the  
2 website, bill inserts, special mailings, social media, email blasts, and updates via our  
3 toll-free number.

4 **Q. Please describe how the Customer Care department responded to the COVID-**  
5 **19 pandemic to protect the Company's customers.**

6 A. During the pandemic, the Company immediately deployed several measures to help  
7 customers deal with the financial strain. As mentioned, we suspended all collection  
8 activity to include collection notices, calls, and disconnections. We extended long  
9 term payment plans to help mitigate large bills. FPUC partnered with local agencies  
10 to connect customers with financial support. Our retail payment network was  
11 expanded during the COVID-19 pandemic to provide additional options to all  
12 customers even those without access to the internet. We continued to accept  
13 payments via mail, online, drop boxes and through our customer service number 24-  
14 hours-a-day, seven days a week.

15 Furthermore, in an effort to protect both its employees and our customers, FPUC  
16 suspended customer walk-in services as of April 2020. With the uncertainty in how  
17 long COVID would continue, and with the increased payment channels provided, the  
18 Company made the very difficult decision to close its walk-in centers permanently in  
19 October 2021. The customers have been understanding and accepting of these  
20 changes.

21 **Q. What other channels were leveraged to enhance communications with the**  
22 **Company's customers?**

1 A. The additional communication channels that were leveraged include targeted  
2 mailings, bill inserts, bill messages, website, social media, email blasts, recording  
3 messaging on our customer service number, outbound campaigns, and  
4 communication with local agencies such as Catholic Charities.

5

6

**New & Enhanced Customer Programs**

7 **Q. What other program enhancements has the Company implemented to improve**  
8 **the customer experience?**

9 A. In addition to the technology and process improvements mentioned, several  
10 additional key improvements are underway that will not only enhance the customer  
11 experience but will also create additional options for customers. For example, in late  
12 1<sup>st</sup> quarter of 2022, the contact center deployed a best-in-class contact center  
13 platform called Five9. The Five9 platform provides operational flexibility through  
14 ease of updates to our call flow options and messaging for inbound contacts. We  
15 will gain the functionality of communicating via chat and text. The platform gives  
16 us the ability to blend contacts and deliver to the appropriately skilled agent via a  
17 single dashboard that will drive efficiencies and provide insight into customer  
18 communication channel preference and channel effectiveness. We will also be able  
19 to integrate support of social media inquiries to complete a view of the customer's  
20 journey. Not only will we gain functionality of implementing contact channels but  
21 will also gain functionality in securing additional customer feedback regarding  
22 reasons for the inquiry to identify opportunities to reduce the need for customer  
23 contact. We will leverage the scripted options within the application to further

1 strengthen our emergency call handling. These would include safety messaging and  
2 key questions relative to gas emergencies.

3 In addition to this functionality, we will integrate our virtual call back, workforce  
4 management system, call recording, quality systems, and performance dashboards  
5 into this single program. This reduces risks of vendor management and provides a  
6 more holistic view of the contact center performance leveraging additional data  
7 points to collect information and analyze to validate our initiatives and strategy.

8 **Q. Are there any other processes you want to mention?**

9 A. Yes. By 2<sup>nd</sup> quarter 2022, the Company plans to implement lockbox functionality  
10 for mailed payments. Previously, these payments were all mailed to our Maryland  
11 office where they were processed manually. The new functionality will automate the  
12 payment processing function and should reduce overall processing time.

13 **Q. Are there any other significant enhancements you want to mention?**

14 A. Yes. The Company is currently evaluating the potential to implement a new billing  
15 system that will consolidate the two existing platforms that are at the end of their life  
16 expectancy into one more streamlined system. The new billing system will offer  
17 enhancements to our ability to see a consolidated view in order to better assist the  
18 customer. The system will reduce many of our manual processes to now automate  
19 completion. Our current systems lack certain functionality that more modern billing  
20 systems provide, such as consolidated customer information, ability to send customer  
21 statements and information automatically, ability to capture customer preferences,  
22 automated service order processing, automated exception reporting and alerts, and  
23 ability to see a holistic view of a customer with multiple accounts to name a few.

1 **Q. Is the new billing system mentioned above being requested in this docket?**

2 A. No. We do not anticipate its implementation prior to the Company's projected test  
3 year for this proceeding.

4 **Q. Would you please summarize your testimony?**

5 A. As evidenced throughout my testimony, a lot of work and focus has been placed on  
6 improving the customer experience. We are committed to continuing to meet our  
7 customer expectations through making prudent investments in technology, providing  
8 options for completing transactions with us, opening additional channels of  
9 communication to conduct business, and continuing to expand our Voice of the  
10 Customer program. The prudent investments made thus far in modernizing our  
11 phone system and supporting technologies have transformed the way we do business  
12 over the past 10+ years. We have set a good foundation that we can build on to  
13 continue to meet, and hopefully exceed, customer expectations while controlling  
14 costs. We will do this through securing systems that enable us to provide options for  
15 the customer to conduct business with us that does not require customer service  
16 representative intervention. The utilization of our recently secured contact center  
17 platform will allow us to communicate with customers differently enabling for  
18 customers to communicate with us in their preferred method. Finally, expanding our  
19 Voice of the Customer program by increasing our survey pool and means in which  
20 we seek feedback will help us to gather more information on the customer's wants  
21 and needs. That feedback will be leveraged to inform both our short-term and long-  
22 term strategy.

23 **Q. Does this conclude your testimony?**

1 A. Yes.

## 1. Procedure Summary

<b>Title</b>	Chesapeake Utilities Corporation customer-facing and internal communications to include letters, statements, emails, newsletters, IVR messaging, strategic presentations, speeches, interviews, social media, websites, bill presentment, bill inserts, other publications, brochures, guides, leaflets, advertisements, and customer care talking points.
<b>Revision Date</b>	March 1, 2021
<b>Audience</b>	All Chesapeake Utilities Corporation Employees All External Vendors Under Contract with Chesapeake Utilities Corporation Customer Care Representatives Customers and/or customer-facing
<b>Risks Addressed</b>	<ul style="list-style-type: none"> <li>• Dissemination of misinformation or inaccurate information</li> <li>• Dissemination of Company Confidential Information</li> </ul>

## 2. Purpose

To assure the development, approval, and distribution of consistent and relevant messaging and/or talking points that inform and engage customer care representatives and/or customers with content to enhance the overall customer experience and represent the official position of Chesapeake Utilities Corporation.

## 4. Step by Step Instructions

1. Author, internal client or business owner, drafts verbiage for customer-facing communications and/or employee talking points.
2. If Author is not CX, they email their fully drafted communications to CX at [CXTeam@chpk.com](mailto:CXTeam@chpk.com).
3. CX reviews communication and provides feedback and applies edits, as appropriate.
4. CX sends draft to Manager, Customer Experience for initial review and must receive feedback, at a minimum.
5. CX sends draft to Author or internal client (Ex: business unit, department) for review and feedback. (Note: Although this is the first draft to the client, it is actually at least the second draft).
6. CX coordinates review with internal client/business owners of communications release, and receipt and incorporation of client's comments, then returns revised draft to client for final comments and review.
7. CX sends client-approved draft to the following team members
  - Director, Customer Care
  - Manager, Customer Care (applicable)
  - Author/Internal Client

8. CX sends the client-approved draft to Corporate Communications Review at [CorporateCommunicationsReview@chpk.com](mailto:CorporateCommunicationsReview@chpk.com) to review and provide feedback.
9. CX reviews comments received and updates draft as appropriate.
10. CX sends the draft to Corporate Communications Review at [CorporateCommunicationsReview@chpk.com](mailto:CorporateCommunicationsReview@chpk.com) for final approval. Approval must be received from one of the following:
  - AVP, Strategic Marketing & Communications
  - Senior Director, Strategic Communications
  - Public Relations Manager
  - Digital Communications Manager
  - Strategic Publications Manager
10. CX sends final communication to the following team members:
  - AVP, Customer Care
  - Director, Customer Care
  - Manager, Customer Experience
  - Author/Internal Client
  - Managers, Customer Care
11. CX or Author initiates distribution process:

NOTE: It is required to include the author on all correspondence exchanged during the review and approval process.

## 5. Definitions & Applicability

Customer Experience will evaluate all customer-facing and internal communications to include letters, statements, emails, newsletters, IVR messaging, strategic presentations, speeches interviews, social media, websites, bill presentment, bill inserts, other publications, brochures, guides, leaflets, advertisements and customer care talking points. Customer Experience will manage the development of the internal and any applicable external reviews and approval process.

6. Contacts		Phone	Email
Eileen Cassidy	561-215-0276		<a href="mailto:ecassidy@chpk.com">ecassidy@chpk.com</a>
Sean Ramey	302-387-7455;		<a href="mailto:sramey@chpk.com">sramey@chpk.com</a>
Aubrey Burris	410-648-2418		<a href="mailto:aburris@chpk.com">aburris@chpk.com</a>
Sarah Hardy	302-272-1714		<a href="mailto:shardy@chpk.com">shardy@chpk.com</a>
David Gilmore	904-805-3546		<a href="mailto:dgilmore@chpk.com">dgilmore@chpk.com</a>
Kelley Parmer	302-213-7131		<a href="mailto:kparmer@chpk.com">kparmer@chpk.com</a>

7. Approval and Sign-off			
Name	Title	Signature	Date
Eileen Cassidy	Manager, Customer Experience		
Sean Ramey	Manager, Customer Care		
Aubrey Burris	Manager, Customer Care		
Sarah Hardy	Manager, Customer Care		
David Gilmore	Director, Customer Care		
Kelley Parmer	AVP, Customer Care		



**Identity Theft Prevention Program**  
**SHARP ENERGY/FLORIDA PUBLIC UTILITIES Plan of Action**  
**February 15, 2012**

- I. Customer files will be secured when not in use. Access is limited to Customer Service Representatives, Clerks, District Manager, Service Manager and Salesperson.
- II. New account review(s) as needed, will be sent to Credit & Collections Specialist for review only after all sensitive data has been blocked out (utilizing either white-out or a post-it note; do not use black marker) on the credit application and TransUnion report. District will shred TransUnion report immediately following credit decision.
- III. Credit card payments taken over the phone are shredded immediately when complete.
- IV. Terminated accounts with no balance due will have their credit application and any TransUnion report shredded before final filing.
- V. Terminated accounts with a balance due will be securely stored at the district; files should remain in a locked filing cabinet and kept in perpetuity.
- VI. See attached for Red Flag procedures.

## **APPENDIX II –**

### **BUSINESS UNIT RED FLAG AND RESPONSE MATRIX**

#### **BUSINESS UNIT – Sharp Energy**

## **DETECTING RED FLAGS**

### **A. New Accounts**

In order to detect any of the Red Flags identified above associated with the opening of a **new account**, Chesapeake Utility personnel will take the following steps to obtain and verify the identity of the person opening the account:

#### **Detect**

1. Require certain identifying information such as name, date of birth, residential or business address, principal place of business for an entity, driver's license or other identification;
2. Review documentation showing the existence of a business entity; and
3. Independently contact the customer.

### **B. Existing Accounts**

In order to detect any of the Red Flags identified above for an **existing account**, Utility personnel will take the following steps to monitor transactions with an account:

#### **Detect**

1. Verify the identification of customers if they request information (in person, via telephone, via facsimile, via email);
2. Verify the validity of requests to change billing addresses; and
3. Verify changes in banking information given for billing and payment purposes.

## IDENTIFYING AND MITIGATING RED FLAGS

Red Flag	Next Step	Mitigation (Steps to Control Losses)
<b>Alerts from Credit Reporting Agencies or 3<sup>rd</sup> parties</b>		
Consumer report indicates fraud or active duty alert	Tell the customer about the alert and ask them to contact the Credit Reporting Agency to resolve the issue	Do not open the account or open account in another name
Credit freeze	Tell the customer about the alert and ask them to contact the Credit Reporting Agency to resolve the issue	Do not open the account or open the account in another name
Notice of address discrepancy	Ask the Customer to verify their previous and current addresses with supporting documentation if necessary	If customer is able to verify addresses, open the account and notify CRA of new verified address according to address discrepancy policy
High Risk Fraud Alert (input SSN not issued by SSA)	Tell the customer about the alert and ask them to contact the Credit Reporting Agency to resolve the issue	Do not open the account or open the account in another name
Deceased	Tell the customer about the discrepancy and ask them to contact the Social Security office to resolve the issue	Do not open the account or open the account in another name
ID Mismatch Alert (surname does not match)	Ask the Customer to verify their surname with supporting documentation if necessary	If customer is able to verify surname, open the account and notify CRA of new verified surname according to discrepancy policy

Red Flag		Mitigation (Steps to Control Losses)
<b>Presentation of Suspicious Documents when Alerts from CRA are received</b>		
Identification documents appear altered or forged	Ask the customer to visit the issuing agency and get an acceptable copy of the suspicious document	Do not open the account
Photo/physical description does not match applicant	Ask the customer to visit the issuing agency and get an acceptable copy of the suspicious document	Do not open the account
Other information on identification is inconsistent information given from applicant	Ask the customer to verify the inconsistent information with supporting documentation such as marriage certificate of social security card	If customer is able to verify information, no further action should be necessary

Red Flag	Next Step	Mitigation (Steps to Control Losses)
<b>Suspicious Personal Identifying Information when Alerts from CRA are received</b>		
Applicant fails to provide all personal ID requested	Inform the customer of the requirements to open an account and direct them to where they can obtain this documentation if they do not already have it.	Do not open the account unless you are able to verify the identity with other types of acceptable documentation
Person attempting to access or open the account cannot provide any information beyond what would typically be found in a wallet or consumer report	Inform the customer of the requirements to open an account and direct them to where they can obtain this documentation if they do not already have it.	Do not open the account unless you are able to verify the identity with other types of acceptable documentation

Customer notifies Chesapeake Utilities that they are not receiving their bill	Confirm mailing address on the account by asking customer what their mailing address is.	If mailing address is correct and records indicate customer should be receiving bills, direct customer to Post Office.
The Chesapeake Utilities is notified of unauthorized charges or transactions in connection with a customer's account	Chesapeake Utilities is to follow the procedures in the "Billing Rights Under the Fair Credit Billing Act" Brochure	Depending upon outcome of investigation either close the account or continue business as usual

Red Flag	Next Step	Mitigation (Steps to Control Losses)
<b>Suspicious Account Activity or Unusual Use of Account</b>		
Breach in the Computer System		
Unauthorized access to or use of customer account information		

Red Flag	Next Step	Mitigation (Steps to Control Losses)
<b>Customer Notification of Identity Thief</b>		
Chesapeake Utilities is notified by law officials or others, that it has opened a fraudulent account for a person engaged in identity theft	Follow the instructions of the law officials	Depending on what law enforcement ask you to do, you may close or closely monitor the account

### Choices for Mitigation

Under the third column, consider choices from the following options:

- a) Monitoring account for evidence of identity theft;
- b) Contacting the customer;
- c) Changing any passwords, security codes, or other devices that permit access to a covered account;
- d) Reopening an account with a new account number;
- e) Not opening a new account;
- f) Closing an existing account;
- g) Not attempting to collect on an account or not selling a covered account to a debt collector;
- h) Notifying law enforcement; or
- i) Determining that no response is warranted under the particular circumstances

## Identity Theft Prevention District Training

1. Limit access to those who need to know:
  - a. Customer files should be secured when not in use. This means in the file cabinet and not left out. Place them in a drawer when not at your desk.
  - b. Limit access to customer files to CSR's, CSRM's, DM's, Service Managers, and Salespersons.
2. Encrypt personal and sensitive information
  - a. Defined: Social security numbers, driver's license number, credit card numbers and any other personal private information.
  - b. We do not have the ability to encrypt information so the following guide lines must be followed.
    - i. Once the account is setup and the FICO score is recorded in the ADDs Customer Information Log then the credit report is to be shredded.
3. Inter-Company Communications: (email or fax)
  - a. Before any credit application and/or credit report is emailed or faxed to another Sharp employee (i.e.: Credit & Collections Specialist), the document is to be copied and the items defined above in 2a are to be blacked-out with a marker before faxing or scanning.
4. Keeping with compliance
  - a. Any time a customer file is pulled:
    - i. Shred any credit reports found in the customer file.
  - b. Any terminated accounts with a zero balance the credit application:
    - i. Credit report and any other sensitive data is to be shredded before moving the file to the terminated files.
  - c. Any terminated accounts with a balance only:
    - i. Credit report is to be shredded. The customer file is then physically handed to the Credit & Collections Specialist for further collection efforts.
5. Credit Report Do's, Don'ts and Flags
  - a. When pulling a credit report in TransUnion, if the customer is moving into a new location, you need to enter the customer's previous address.
  - b. If the customer has not lived at the current address for at least 5 years, you must have the previous address for verification purposes.
  - c. Credit report alerts
    - i. See hand out
6. Customer ID verification
  - a. Verify the person you are speaking with is the account holder by verifying telephone number, mailing address, etc.



# ACKNOWLEDGMENT

I have read, understand and will comply with the contents of the Identity Theft Prevention Program. I have also had the opportunity to discuss any matter contained in the following manual with the Credit & Collections Specialist and/or management:

SHARP ENERGY/FLORIDA PUBLIC UTILITIES  
IDENTITY THEFT PREVENTION PROGRAM

---

Employee Name (please print)

---

Employee Signature

---

District

---

Date

**SCHEDULE**

**TITLE**

**Witness**

<b>PROJECTED TEST YEAR</b>
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G2-19 a to d	Projected Test Year - Calculation of Operation and Main Expense Supplement	M. Cassel, J. Bennett, M. Galtman, V. Gadgil, M. Napier, K. Parmer, N. Russell, K. Lake, D. Rudloff, B. Hancock
G2-19f	Over and Under Adjustments	M. Cassel, J. Bennett, M. Galtman, V. Gadgil, M. Napier, K. Parmer, N. Russell, K. Lake, D. Rudloff, B. Hancock