

**BEFORE THE**

**FLORIDA PUBLIC SERVICE COMMISSION**

**DOCKET NO. 20230023-GU**

**IN RE: PETITION FOR RATE INCREASE**

**BY PEOPLES GAS SYSTEM, INC.**

**PREPARED DIRECT TESTIMONY AND EXHIBIT**

**OF**

**KAREN K. SPARKMAN**

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**PREPARED DIRECT TESTIMONY AND EXHIBIT**

**OF**

**KAREN K. SPARKMAN**

**INTRODUCTION**

**Q.** Please state your name, address, occupation and employer.

**A.** My name is Karen K. Sparkman. My business address is 702 North Franklin Street, Tampa, Florida 33602. I am employed by Tampa Electric Company (“Tampa Electric”) as Vice President of Customer Experience. I work on behalf of Tampa Electric and Peoples Gas System, Inc. (“Peoples” or the “company”) in a shared service capacity.

**Q.** Please describe your duties and responsibilities in that position.

**A.** As Vice President of Customer Experience, I am responsible for leading the organization’s Customer Experience Strategy and Operations. My duties include: (1) ensuring the company understands customers’ evolving expectations for natural gas services; (2) developing and implementing a strategy and plan to stay relevant to and provide excellent service to our customers; and (3) delivering an excellent customer experience through the Customer Experience Centers, Digital Experience, Billing and Payment Services, Credit and Collections and Customer Communications.

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

**A.** I have a bachelor’s degree in business management and a master’s in business administration from Colorado Technical University. I began my utility career nearly 23 years ago with Colorado Springs Utilities in their contact center. Since then, I have held positions which have progressed in responsibility, functional area and leadership at three national utilities providing natural gas, electricity, water and wastewater services. I have experience in all areas of customer experience, including call centers, workforce management, billing and payment, meter operations, revenue protection, project management, and strategic planning. I joined Peoples in June 2017 as Director of Customer Experience Operations. I assumed my current role in October 2020.

**Q.** Have you filed testimony before the Florida Public Service Commission (“Commission”) in prior cases?

**A.** Yes. In Docket No. 20200051-GU, I filed testimony adopting the direct testimony of Peoples’ witness Monica A. Whiting.

**Q.** What are the purposes of your prepared direct testimony in this proceeding?

**A.** The purposes of my direct testimony are to: (1) discuss the company’s evolving strategy focused on excellence in customer service; (2) describe improvements to customer service made since the company’s last base rate proceeding in 2020; (3) explain the company’s plans for continuing to improve its customer experience; (4) describe Peoples’ commitment to continued excellence and achievement in customer satisfaction, including Peoples’ J.D. Power customer satisfaction achievements; and (5) demonstrate that the level of Customer Experience operations and maintenance (“O&M”) expenses in the company’s 2024 test year is reasonable and prudent.

**Q.** Did you prepare any exhibits in support of your prepared direct testimony?

**A.** Yes. Exhibit No. KKS-1 was prepared under my direction and supervision. My exhibit consists of four documents entitled:

 Document No. 1 List of Minimum Filing Requirements (“MFR”) Co-Sponsored

 Document No. 2 Peoples’ Award History Since 2013

 Document No. 3 J.D. Power Customer Satisfaction Scores

 Document No. 4 Capital by Major Project 2022-2024

 The contents of my exhibit were derived from the business records of the company and are true and correct to the best of my information and belief.

**CUSTOMER EXPERIENCE ORGANIZATIONAL STRUCTURE**

**Q.** Describe how customer experience is implemented at Peoples and the major functional areas in that department.

**A.** Peoples’ customer experience is delivered through a shared service agreement with the company’s affiliate, Tampa Electric. This organizational structure allows Peoples to provide customer experience in a streamlined way and have access to a larger workforce. This organization is made up of approximately 450 employees and provides the following eight major functional areas in support of Peoples:

 1. Customer Experience Centers: Support residential and business customers through call center activities.

 2. Billing Operations: Delivers accurate and timely billing information including coordinating with Peoples to receive meter reading information and resolve meter related issues.

 3. Payment Team: Processes and balances customer payments from several vendor options.

 4. Credit and Collections: Supports Peoples through customer positive identification, including fraud investigation, debt collection, research/maintenance of customer deposit securitization and bankruptcies.

 5. Customer Assistance: Networks with social service agencies to assist with customers who qualify for local, state, and federal funds.

 6. Customer Experience Strategy, Training and Workforce Management: Delivers (a) strategy, quality monitoring, training, and improvement programs for the Customer Experience team members; (b) complaint resolutions, research, and voice of the customer programs; (c) policy and procedure development; and (d) compliance monitoring.

 7. Digital Customer Solutions: Responsible for digital customer solutions from strategy to delivery including customer portal, Interactive Voice Response (“IVR”) and digital outbound communications.

 8. Business Solutions: Supports the use of technology and continual enhancements to the Customer Relationship Management and Billing (“CRMB”) solution and other solutions.

**Q.** What are Peoples’ goals around customer experience?

**A.** Peoples’ overarching goal is to provide customers with a simple, personalized, and flexible experience. In addition, the company utilizes the following specific 2023 goals around Customer Experience:

 1. Customer Safety – Emergency Response Rate

 2. Transactional Satisfaction

 3. Outstanding and Proactive Communications

 4. Customer Journey Mapping

**Q.** Has Peoples formalized its plans for achieving this goal?

**A.** Yes. The company’s Customer Experience Strategy, developed in 2017, is continually reassessed and revised based on continued two-way communication and engagement with our customers to better reflect our overarching goal.

 The Customer Experience Strategy states that we will deliver outstanding customer service by:

 1. Simplifying the customer experience;

 2. Personalizing the customer experience; and

 3. Partnering with customers in meaningful ways.

**Q.** How does this strategy benefit Peoples’ customers?

**A.** The customer is the cornerstone of this strategy and is the primary driver and recipient of the value propositions Peoples seeks to deliver. The results of the strategic focus on the customer’s experience has proven to be successful, as indicated by the continued excellence in customer satisfaction as measured by J.D. Power and Cogent/Escalent.

**CUSTOMER EXPERIENCE CENTERS**

**Q.** Please describe Peoples’ Customer Experience Centers.

**A.** Peoples’Customer Experience Centers are central hubs for customer connection and manage all types of incoming channels of communication, including telephone, email, and social media. The Customer Experience Centers handle emergency and nonemergency requests 24 hours a day, 7 days a week, 365 days a year. The company has two (2) Customer Experience Centers in Tampa, with one located at the company headquarters in downtown and the other in Ybor City. The downtown Customer Experience Center focuses on business customers while the Ybor City location serves residential customers.

 Customer Service Professionals (“CSPs”) serve customers by helping with: (1) emergencies; (2) credit arrangements; (3) turn-on and turn-off service requests; (4) billing and remittance inquiries; and (5) miscellaneous customer account inquiries. All the company’s CSPs, whether an in-office or work-from-home employee, live in Florida. The company finds this local connection important and meaningful to assisting customers.

 The management of utility-related emergency calls is a top priority for Peoples in keeping its customers and communities safe. The company provides CSPs with specialized training for handling these calls and the CSPs take this responsibility seriously.

**Q.** Please describe any improvements made to Customer Experience Centers since the company’s last general base rate proceeding in 2020.

**A.** Since 2020, the company made notable improvements to the Customer Experience Centers, including enhancement of the quality monitoring program. This enhancement supports and improves the overall customer experience through audio/visual monitoring of inbound and outbound phone and online customer interactions with CSPs.

 The monitoring program evaluates: (1) quality standards; (2) first call resolution; (3) transactional accuracy; (4) compliance with applicable policies, rules, and regulations; and (5) customer impact. The evaluations include monitoring CSP behaviors that provide a positive customer experience and align with the drivers of customer satisfaction, as defined by J.D. Power. The evaluations are reviewed and any corrective or affirming feedback is provided to the CSPs.

 The company conducted post-training course evaluations via the monitoring process described above and found the CSPs’ scores increased by several points.

**ASSISTANCE FOR LOW-INCOME CUSTOMERS**

**Q.** Has thecompany implemented specific programs or processes to help low-income customers since 2020?

**A.** Yes.The companyinstituted a Customer Assistance Team in 2021 to help low-income customers who struggle to pay their bill and/or are trying to keep their costs of gas down. This team is led by a team member that serves as an Advisory Board Member for National Energy & Utility Affordability Coalition (“NEUAC”) which is dedicated to heightening the awareness of the energy needs of low-income energy consumers by fostering public-private partnerships and engaging in other activities to help address these needs.

 The company has a long-standing practice of offering short-term payment arrangements, as well as long term installment plans, to provide flexibility with extensions when customers are struggling to pay their gas bills. If assistance beyond a payment arrangement is needed, customers are referred to their local United Way 2-1-1 agency for additional resources.  CSPs are also able to generate a customer assistance referral to our internal Customer Assistance Team for further review.

 The Customer Assistance Team works with a network of local, regional, and federal non-profits, including community action agencies, to aid with customers’ payment of utility bills and provide referrals to our customers to other services offered by these community stakeholders. Specifically, the Customer Assistance Team provides referrals to the Low-Income Home Energy Assistance Program (“LIHEAP”) providers, Emergency Home Energy Assistance Program (“EHEAP”), and the Share Program, which is administered thru the Salvation Army and Catholic Charities.

 Peoples also enhanced the online payment process by adding a specific “agency” portal for our 248 social service agency partnerships, allowing these entities to assist the customers in need more efficiently. In 2022, Peoples collaborated with these agencies to provide over $470,000 in assistance to over 2,300 gas households.

**EVOLUTION OF CUSTOMER EXPECTATIONS**

**Q.** Please explain how the expectations of Peoples’ customers have changed in relation to their natural gas service?

**A.** Peoples believes that customer expectations of their natural gas service are increasing across every aspect of that service. These rising expectations are similar across all utility types, whether that service is natural gas, electric, water, or telecom.

 Customers today expect more, and the company anticipates this evolving outlook on customer experience to continue. Customers want a quality experience and one that is consistent, personalized, and simple to use. Customers want information specifically related to services that impact their account, service quality and reliability, billing, and payment. Customers want to know what the utility is doing to improve the utility’s infrastructure and what they are doing to lessen any negative impacts to the environment. Customers want options, and they want to be informed and in control of their usage and their experience. Customers expect their utility to provide the same digital experiences and options as any other company they do business with, using the latest technologies and platforms, for extreme ease of doing business at any time of the day or night.

**Q.** Please describe how Peoples has responded to the change in expectations of its customers.

**A.** Peoples improved the customer experience to meet changing customer expectations by using new technology, creating new experiences, new options, and opportunities by engaging with customers through new pathways. The objective is to understand the journey they would like to be on and then join them in that journey.

**Q.** How do customers expect Peoples to contribute to a more sustainable environment?

**A.** Peoples believes that customers want to understand how their utility is impacting the environment and what steps are being taken to contribute to a more sustainable environment. Sustainability is at the core of how Peoples does its business. The company has committed to reducing our own carbon footprint and greenhouse gas emissions while also working with our customers to decrease theirs. By increasing efficiency, decreasing our own system emissions, and supporting the development and use of renewable natural gas, compressed natural gas and liquified natural gas, the company is fully dedicated to meeting the expectations of our customers and the company’s environmental plan.

 In addition, natural gas is one of the safest and cleanest fuels available; it emits less pollution than any other fossil fuel source. However, customer expectations continue to increase as it relates to sustainability. Customers want to stay informed about Peoples’ efforts in using renewable natural gas and how their utility is serving as an environmental steward, including the protection and restoration of natural resources. Peoples is ranked first in the nation by customers for corporate citizenship, according to J.D. Power. This award is measured by evaluating a company’s: (1) support of local economic development; (2) awareness of environmental efforts; (3) level of involvement within the community; and (4) awareness of safety and conservation efforts.

**CHANGES IN CUSTOMER EXPERIENCE SINCE 2020**

**Q.** How has Peoples improved the customer experience since the company’s last general base rate proceeding in 2020?

**A.** Peoples improved the customer experience through:

 1. Continual evaluation and modification to Peoples’ customer strategy to meet customer expectations.

 2. Using technology strategies, programs, and services to improve customer programs and capabilities, and provide diverse options for customer-company interaction.

 3. Continued identification of process improvements that enhance our ability to serve our customers proficiently.

**Q.** How much did the company spend in 2022 on capital projects in Customer Experience and how much does it plan to spend in 2023?

**A.** The company spent $4.0 million in Customer Experience in 2022 and expects to spend $2.9 million in 2023.

**New Technology Projects**

**Q.** What types of technology improvements has the company made to improve the customer experience since the last general base rate case proceeding?

**A.** Peoples invested in the following technology projects since its last general base rate proceeding in 2020 to improve the customer experience: (1) Replacement of the company’s IVR system and enhancements to the company’s Contact Center Management (“CCM”) system; (2) Enhancement to the company’s public website; and (2) Enhancement to the digital billing experience by adding an interactive billing feature.

**1. Replacement of the IVR System and Enhancement of the CCM System**

**Q.** Please describe the replacement of the IVR system and the enhancement of the CCM system.

**A.** The IVR system platform was replaced due to outdated hardware. The enhancement of the CCM was required due to the replacement of the IVR platform and included a new virtual assistant feature. This project improved many key operational Customer Experience tasks, provided an improved call flow menu, and offers other features to enhance automation of services. These upgrades also allow for further integration of customer preferences for outbound company communications.

**Q.** What was the cost for the replacement of the IVR system and the enhancement of the CCM system?

**A.** The company made a capital investment of $1.3 million in 2022 for the replacement of the IVR system and the enhancement of the CCM system.

**Q.** How has this change to the IVR and CCM systems improved the customer experience?

**A.** The IVR and CCM systems handle over four million calls on an annual basis for Tampa Electric and Peoples, with 50 percent routed to CSPs and the remaining 50 percent resolved via self-service. The change to these systems improved the customer experience by:

 1. Integrating billing and other customer systems via a modern desktop agent, allowing CSPs to assist customers more efficiently and effectively.

 2. Establishing new self-service payment options, facilitating the customer to select a self-designated timeframe for payment.

 3. Providing new self-service dunning options.

 4. Expanding call capacity, allowing both Tampa Electric and Peoples to accept a higher volume of concurrent calls.

 5. Reducing the overall time it takes a customer to navigate the IVR through improved speech recognition software and menu structure.

 6. Providing a new after-call customer survey.

 Additionally, as part of the enhancement to the CCM, the company implemented a virtual assistant (“VA”, “virtual agent” or “chatbot”). The VA is a lifelike, conversational, non-transactional chatbot providing a unique, interactive, and personalized means for customers to find answers and get assistance on the company’s website, 24 hours a day, 7 days a week, 365 days a year. With the use of the VA, many customers see quicker resolution times for the more basic inquiries such as “how do I report an outage?” and “where can I make a payment?”.

**2. Public Website Enhancement**

**Q.** Please describe the enhancement made to the company’s public website?

**A.** Peoples implemented a new Content Management System (“CMS”) for the public website. This CMS replacement project replaced outdated technology and allows for real-time updates to site content. Peoples chose a CMS platform designed to meet the needs of customers and accomplish Peoples’ overall Customer Experience Strategy.

**Q.** What was the cost for the implementation of a new CMS for the company’s public website?

**A.** The company made a capital investment of $809,863 in 2022 to implement a new CMS to the company’s public website.

**Q.** How did this change to the company’s public website improve the customer experience?

**A.** TheCMS system(1) reduced calls because customers are empowered to self-serve online; (2) increased customer engagement; (3) increased Peoples’ J.D. Power customer satisfaction score; and (4) improved customer understanding and trust.

**3. Enhancement to the Digital Billing Experience.**

**Q.** Please describe the enhancement to the digital billing experience**.**

**A.** The company enhanced the digital billing experience by adding an interactive billing solution that creates a more personalized billing experience and is expected to go-live in May 2023.

**Q.** What was the cost for this change to the digital billing experience?

**A.** The company made a capital investment of $1.0 million in 2022 for implementing an interactive billing experience as part of its digital billing experience.

**Q.** How will this change to the digital billing experience improve the customer experience?

**A.** This solution will allow the customer to choose what billing information they deem relevant to view and will provide detailed billing information. In other words, this solution allows the customer to see as much, or as little, billing data as they like. This will be a more expansive experience than the current paper bill format. This interactive solution will also provide opportunities for customer insights on consumption patterns including (1) link to an online home energy audit; (2) tips for handling high bills; and (3) energy savings advice.

**EXCELLENCE IN CUSTOMER SATISFACTION**

**Q.** What industry awards has Peoples received for its customer service?

**A.** In 2022, Peoples was recognized as one of the nation’s most trusted utilities for the ninth time in Cogent/Escalent’s Syndicated Utility Trusted Brand and Customer Engagement Residential study. The company received the third-highest Brand Trust Index score in the United States out of the 140 natural gas, electric and combination utilities that are included in the study.

 Cogent/Escalent also named Peoples a Trusted Business Partner for the second year in a row, based on the Syndicated 2022 Utility Trusted Brand and Customer Engagement Business study. Peoples’ Brand Trust Index and Engaged Customer Relationship scores ranked highest out of 82 United States utilities included in the business study. Document No. 2 of my exhibit shows Peoples award history since 2013.

 In its commitment to supporting Florida’s clean energy future, the company also achieved high scores by Cogent/Escalent in the Environmental Dedication and Customer Effort Indexes of the Cogent Syndicated residential study. Additionally, Cogent/Escalent recognized the company as an Environmental Champion for the eighth consecutive year and one of the easiest utilities to do business with in 2022.

**Q.** Please describe the awards measuring customer service/satisfaction that Peoples has received from J.D. Power.

**A.** Peoples’ J.D. Power ranking for residential customer overall satisfaction has remained first in the South Midsize segment for the past 10 years. Document No. 3 of my exhibit shows the company’s customer satisfaction index scores since 2013. The company has steadily improved from an overall satisfaction score of 787 in 2017, to 886 at the end of 2021, and ended 2022 at 865. The company is also currently ranked first in the nation out of 83 brands, as it has been for nine of the past 10 years. For business customers, the company placed first in our segment and the nation for 2022. This is the sixth time in the past eight years that Peoples has been ranked first in our segment, and the fourth year in a row ranking first in the nation. The company’s overall satisfaction score has also steadily increased from 832 in 2017 to 865 at the end of 2022.

**Q.** Has Peoples received any similar awards measuring customer service?

**A.** Yes, in 2021, TECO Energy won Chartwell’s Best Practices Silver Customer Service Award for the company’s Voice of the Customer program and the work done since its launch in 2020. The program seeks to gain a more holistic view of customers across multiple journeys and interactions to understand gaps in customer satisfaction and prioritize strategic initiatives to improve the customer’s experience. Peoples’ Voice of the Customer program was also selected for presentation at the 2021 and 2023 Customer Service Week national conference.

**MEASURING THE CUSTOMER EXPERIENCE**

**Q.** How does Peoples measure its performance in customer experience?

**A.** Peoples measures its performance in customer experience based on customer satisfaction scores as measured by J.D. Power and by the level of customer complaints filed with the Commission.

**Q.** How has the company performed in Commission customer complaints?

**A.** Customer complaints filed with the Commission against Peoples have decreased by approximately 43 percent from 101 total complaints in 2012 to 58 complaints in 2022. The decrease in complaints is driven largely by: (1) implementation of the new billing system in 2017; (2) the new IVR system implemented in 2021 with increased self-serve options; (3) customer portal enhancements; (4) the customer notification and preference management system; and (5) by Peoples’ strong customer focus and improved business operations.

 The company is proud that it has had zero Commission infractions over the last seven years. As part of its commitment to quality customer service, Peoples contacts all customers who file a formal or informal Commission complaint to ensure these matters are resolved with the customer. Additionally, Peoples uses these complaints as an opportunity for continuous improvement, either through employee training, process or system changes, and improved customer education.

**Q.** In general, how has the company’s performance in customer experience trended since the last general base rate proceeding?

**A.** Since the last general base rate proceeding in 2020, Peoples has remained number one in overall satisfaction in the South Midsize segment and in the industry for both residential and business customers according to J.D. Power. In the residential study, Peoples was the first brand to a achieve a score over 800 in overall satisfaction in 2020 and remains one of only two brands with a score above 800 in 2022.

**2024 CUSTOMER EXPERIENCE PROPOSED RATE BASE ADDITIONS**

**Q.** What is Peoples’ capital budget for Customer Experience in 2024?

**A.** As shown in Document No. 4 of my exhibit, the capital budget for Customer Experience totals $3.6 million for 2024. The projects reflected in this budget are also shown on Document No. 4 of my exhibit.

**Q.** How does Peoples determine its capital budget for Customer Experience?

**A.** Customer Experience identifies capital improvement opportunities based on analysis of industry best practices, customer feedback through our Voice of Customer program and identification of points of customer concern and gaps in customer satisfaction through customer journey mapping.

**Q.** How does the company plan and manage its major capital improvement projects for Customer Experience?

**A.** Customer Experience drafts a business case for each capital project that identifies potential benefits to the organization and to the customer and supports the capital project’s priority ranking and cost. These capital projects are then submitted through the company’s capital approval process. Once approved, the capital projects are tracked through Customer Experience’s capital project portfolio and are reviewed monthly to ensure quality, timeline, and budget are on track.

**Q.** You previously explained the company’s rate base additions in Customer Experience since the company’s last general base rate proceeding in 2020 and why they were prudent and that they continue to be used and useful to serve the company’s customers. Now, please describe and explain the additions to rate base in Customer Experience forecasted to occur in the 2024 projected test year. Why are each of these projects prudent and how will they benefit the company and its customers?

**A.** The major project included in the capital for the 2024 projected test year is the Customer Experience and Digitalization project. This project will continue to focus on improvements to meet customer expectations and will make it easier for our customers to do business with Peoples. Two main features of the Customer Experience and Digitalization project include a Transactional Chatbot and Mobile Application. These features are described below:

 1. Transactional Chatbot: The transactional chatbot efforts will enhance the existing chatbot search functionality and will provide customers the ability to self-serve multiple transactional requests including: (a) pay bills; (b) update account information; (c) start/stop/transfer; and (d) report outages. Transactional chatbot enhancements will increase the customers’ self-service capabilities, providing the customer with the flexibility of performing account related transactions.

 2. Mobile Application: The Mobile Application (“App”) will deliver the core capabilities of the website experience within a native, mobile-friendly package. This will include items such as bill presentation, bill payment, outage reporting, outage map, Start/Stop/Transfer, and chatbot. The Mobile App will allow the customer to interact with Peoples’ digital mediums more easily. This will allow the user to stay logged into their account, more easily navigate (relative to a web browser), leverage push notifications, etc.

**2024 CUSTOMER EXPERIENCE O&M EXPENSE**

**Q.** What amount of O&M expenses did Customer Experience incur in 2022?

**A.** The total in 2022 was $13.2 million. This total amount was recorded in FERC Account 903 and the amounts are shown on MFR Schedule G-2, page 14.

**Q.** What are the projected O&M expenses for your area in 2023 and 2024?

**A.** The totals in 2023 and 2024 are $14 million and $15 million, respectively. The distribution of these amounts is also shown on MFR Schedule G-2, page 14.

**Q.** Why is the total projected amount of 2024 O&M expense for Customer Experience higher than the actual amount in 2022?

**A.** The total in 2024 is $1.8 million higher than in 2022. Approximately $770,000 of this increase are labor costs that are budgeted on a trended basis, as described in the direct testimony of company witness Donna L. Bluestone. Approximately $440,000 of this increase are other costs that were budgeted on a trended basis, as described in the direct testimony of company witness Rachel B. Parsons. The remainder of the increase consists of approximately $470,000 of not trended labor costs and approximately $130,000 of not trended other costs. These amounts are shown on MFR Schedule G-2, page 14.

**Q.** Why are not trended labor costs increasing by approximately $470,000 from 2022 to 2024?

**A.** The not trended labor costs are increasing as the company adds 6 positions to the business operations support (“BOSS”) team which is responsible for the scheduling, planning, and dispatching of service work to all 14 service areas. Company witness Timothy O’Connor describes these additions to the BOSS team in his direct testimony.

**Q.** Why are not trended other costs increasing from 2022 to 2024?

**A.** The increase is driven by the Customer Relationship Management and Billing (“CRMB”) Asset Usage fee which supports the continued use of our CRMB platform.

**Q.** Is the total amount of 2024 projected O&M expense for Customer Experience reasonable?

**A.** Yes. The overall level of Customer Experience O&M expense for 2024 is reasonable. The company remains focused on achieving operational efficiencies to invest in more strategic functions that will enhance the customer experience.

**SUMMARY**

**Q.** Please summarize your prepared direct testimony.

**A.** My direct testimony provides an overview of Customer Experience. I describe the company’s capital budget process for Customer Experience and capital projections for the 2024 projected test year. I demonstrate that Customer Experience’s level of O&M expense in the company’s 2024 projected test year is reasonable and prudent.

 Peoples has a long history of delivering safe, clean, reliable, and affordable natural gas while delivering high value customer service, as measured through customer satisfaction. Since Peoples’ last general base rate proceeding in 2020, the company has successfully continued to invest in technology, people, and processes that enhances the customer experience. These continued enhancements are necessary to meet growing technology and customer expectations. Since the company’s last general base rate proceeding in 2020, the company has successfully (1) replaced the IVR system and made enhancements to the CCM system that increased customer engagement and improved customer; and (2) implemented a new CMS for our public website, resulting in increased customer engagement. The company also enhanced billing and payment services and made many smaller process and system improvements to better serve our customers. Additionally, this year, the company will add an interactive billing solution to create a more personalized billing experience.

 The company’s continually evolving strategy focused on excellence in customer service, coupled with Peoples’ goal of providing customers with effortless customer experiences has been foundational to the company’s continued success. These efforts have resulted in the company’s J.D. Power ranking for residential customer overall satisfaction remaining first in the South Midsize segment for the past 10 years.

**Q.** Does this conclude your prepared direct testimony?

**A.** Yes.

# EXHIBIT

**OF**

**KAREN K. SPARKMAN**

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**List of Minimum Filing Requirements**

**Co-Sponsored by Karen K. Sparkman**

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