

**ILLINOIS-AMERICAN WATER COMPANY**

**IAWC EXHIBIT 5.0**

**REBUTTAL TESTIMONY**

**OF**

**KAREN H. COOPER**

**(Docket 05-0681/06-0094/06-0095 (consol.))**

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1 **REBUTTAL TESTIMONY**

2 **OF**

3 **KAREN H. COOPER**

4 **I. WITNESS IDENTIFICATION**

5 **Q1. Please state your name.**

6 A. My name is Karen H. Cooper.

7 **Q2. Are you the same Karen Cooper who provided Direct Testimony in this proceeding?**

8 A. Yes.

9 **II. PURPOSE OF TESTIMONY**

10 **Q3. What is the purpose of your Rebuttal Testimony in this proceeding?**

11 A. The purpose of my Rebuttal Testimony is to respond to certain portions of the Rebuttal  
12 Testimony of Homer Glen Witness Mary Niemiec (HG Ex. 5.0).

13 **III. RESPONSE TO MARY NIEMIEC**

14 **Q4. Ms. Niemiec states (p. 9) that she does not know the criteria Illinois-American  
15 Water Company ("IAWC") uses to distinguish a customer inquiry from a  
16 complaint. What is your response?**

17 A. As I explained in my Direct Testimony (pp. 11-12), IAWC identifies complaints based on  
18 the criteria set forth in 83 Illinois Admin. Code Section 600.170, which defines a  
19 complaint as a "substantial objection made to a utility by a customer as to its charges,  
20 facilities, or service, the disposal of which complaint requires investigation or analysis."  
21 In essence, an inquiry becomes a complaint when it is a substantial objection that requires  
22 investigation or analysis. IAWC maintains two types of complaint records consistent  
23 with 83 Ill. Admin. Code 600.170(a): complaints referred to the Account Resolution  
24 Team and complaints that went directly to a manager or executive within IAWC and not

25 to the Customer Service Center ("CSC"). IAWC also maintains records of informal  
26 complaints made to the Commission, although these complaints were not "made to a  
27 utility" as required by 83 Ill. Admin. Code 600.170(a).

28 **Q5. Would complaints be understated, as Ms. Niemiec asserts?**

29 A. No. As I discussed in my Direct Testimony (pp. 12-13), not every customer inquiry to  
30 the CSC is a complaint as defined in the Commission's rules. IAWC maintains its  
31 complaint logs in accordance with Commission rules and does not understate the number  
32 of complaints.

33 **Q6. Ms. Niemiec (p. 9) also asserts that your testimony merely reviewed the "records"  
34 regarding residents' complaints. Is this correct?**

35 A. No. Among other things, I explained CSC training, policies and procedures to  
36 demonstrate that the CSC makes every effort to ensure that its representatives respond to  
37 customer inquiries in a courteous and efficient manner. I also described how IAWC  
38 established a Chicago-area "specialty desk" at the CSC to handle concerns specific to  
39 Chicago Metro. In addition, I described other measures, such as staffing increases, that  
40 the CSC has undertaken to help ensure the highest quality customer service.

41 **Q7. Ms. Niemiec states that, in the case of Ms. Finnegan, IAWC did not discipline the  
42 employee in question but instead labeled Ms. Finnegan irate. What is your  
43 response?**

44 A. The CSC record entries documenting alleged harassment were related to an interaction  
45 the customer had with a field service employee and not the CSC. As such, Ms.  
46 Finnegan's concerns were addressed by Mr. Ruckman (Direct, pp. 57-61). I note that Mr.  
47 Ruckman testified that the relevant customer service representative was counseled by his

48 supervisor about how to appropriately respond to a customer. I also note that CSC  
49 records indicates that Ms. Finnegan was "irate" on certain other occasions when she  
50 called the CSC.

51 **Q8. Does this conclude your rebuttal testimony?**

52 A. Yes.