

Docket No. UE 433
Exhibit PAC/1500
Witness: William J. Comeau

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PACIFICORP

Direct Testimony of William J. Comeau

February 2024

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1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. Please state your name, business address, and current position with PacifiCorp**
3 **d/b/a Pacific Power (PacifiCorp or Company).**

4 A. My name is William J. Comeau. My business address is 1407 West North Temple,
5 Suite 310, Salt Lake City, Utah, 84116. I am the Vice President of Customer
6 Experience and Innovation for PacifiCorp.

7 **Q. Please describe your education and professional experience.**

8 A. I have a Bachelor of Science from Weber State University and a Master of Business
9 Administration from Keller University. During my 22 years of working in the utility
10 industry I have held multiple responsibilities including roles in economic
11 development, customer service, demand side management programs and renewable
12 energy, and since January 2020, I have served as Vice President of Customer
13 Experience and Innovation. Through that role I oversee PacifiCorp’s call centers,
14 customer billing, customer technology tools (*e.g.*, customer web account and mobile
15 app) and customer programs.

16 **Q. Have you testified in previous regulatory proceedings?**

17 Yes. I have previously sponsored testimony in Washington, Wyoming and Utah.

18 **II. PURPOSE OF TESTIMONY**

19 **Q. What is the purpose of your testimony in this case?**

20 A. I provide background on, and the need to upgrade, the Company’s legacy Customer
21 Service System (CSS).

1 **III. PACIFICORP'S CURRENT CUSTOMER SERVICE SYSTEM**

2 **Q. Can you please provide background on the Company's current system?**

3 A. Yes. PacifiCorp's existing CSS was placed in service in the 1990's. The initial CSS
4 utilized IBM mainframe technologies and provided an integrated solution for the
5 Company's customer service needs, but the system was limited to supporting billing
6 and customer care functions. The CSS currently supports, in various functions and
7 capabilities, the Company's billing and relationship management of two million
8 customers across its six-state service territories.

9 **Q. Has PacifiCorp expanded CSS capabilities over time?**

10 A. Yes. Over time, the Company enhanced the core CSS products to meet evolving
11 customer and regulatory expectations. In 2001, the Company added the Customer
12 Relationship Management function to better integrate customer contact management.
13 Starting in 2005, PacifiCorp integrated the Mobile Workforce Management function
14 to improve field service coordination for customer requested work orders, and better
15 track net metering and customer generation data collection and billing compatibilities.
16 In 2018, the Company expanded the CSS to address web and mobile apps for
17 customers to manage their accounts, pay bills, and report outages. Also in 2018,
18 PacifiCorp added customer preferences and notification support to provide customer
19 communication channel preferences.

20 **Q. Are there limits to the existing CSS?**

21 A. Yes. Due to the age of the current CSS system and the need to meet evolving
22 customer expectations, CSS has reached its limits for performance, stability, security,
23 upgrades, and technical support. The current hardware and software prohibit

1 flexibility, integration, and forward adoption of new technologies. The IBM
2 mainframes were invented and built to serve information technology (IT) needs in a
3 pre-cellular phone and pre-widespread adoption of the internet business climate. Fast
4 forward several decades, and the mainframes have limited ability to incorporate
5 modern services, advanced rate structures, or technologies. Focusing on interval
6 meter data specifically, CSS lacks the ability to store and process large amounts of
7 interval data.

8 **Q. Are there other limits to the existing CSS?**

9 A. Yes. First, I am concerned about the Company's ability to maintain the existing CSS
10 given the shifting marketplace over the last decade from hardware and software
11 physically located on the user's premise, to cloud or remote-based software and
12 hardware. While my primary responsibility at the Company is customer service, not
13 hiring IT professionals, I am aware that this shift means IT professionals will have
14 skill sets that align with the current state of the industry, not mainframe software from
15 the 1990's.

16 Finally, on limited occasions CSS became unresponsive due to high
17 workloads and constraints of resources in the mainframe resulting from events, when
18 they happen at the same time, such as large outages or higher call volume. This is of
19 particular concern as the demands from customers for more access to information are
20 increasing.

21 **Q. Are there any other details you would like to provide about the Company's**
22 **CSS?**

23 A. Yes. While CSS has been a durable and hard-working system for the last several

1 decades, it is time to replace and modernize the Company's IT system. The current
2 system has mainframe capacity issues, requires unnecessary complexity in managing
3 system interfaces, is beginning to experience performance problems, and often creates
4 challenges to align support, patches, and enhancements across multiple vendors.

5 **IV. DECISION TO UPDATE THE CURRENT CSS**

6 **Q. What lead the Company to decide to update its CSS?**

7 A. The Company concluded that it was time to replace and update its CSS hardware and
8 software for the reasons discussed above. The new CSS will be a modern system to
9 replace existing functionality and provide the foundation to continually add new
10 functionality to improve the customer experience over the life of the system.

11 **Q. How did the Company select a vendor?**

12 A. PacifiCorp has several software systems that are reaching the end of their operational
13 lives. Technological advancements and functionality needs are outpacing its ability to
14 update outdated systems. As PacifiCorp was contemplating software system
15 improvement plans, its parent company, Berkshire Hathaway Energy (BHE),
16 determined that it could improve efficiencies across platforms by looking to
17 standardize certain systems. PacifiCorp compared participation in the BHE effort
18 versus stand-alone replacement and determined that participation in common
19 enterprise systems was a prudent decision that will continue to improve PacifiCorp's
20 cybersecurity protections, leverage aggregation to cost-effectively replace existing IT
21 infrastructure that is reaching the end of its anticipated useful life, align systems and
22 processes to create increased collaboration and flexibility of resources, meet customer
23 expectations, and improve the customer experience over time.

1 **Q. What is the overall cost of the CSS update?**

2 A. The forecast project cost for implementation of the updated customer information
3 system is approximately \$154.7 million on a total-Company basis, which translates to
4 approximately \$42.4 million on an Oregon-allocated basis.

5 **Q. How will the new system improve the Company's CSS and benefit customers**
6 **over time?**

7 A. The new CSS system will be based on current technology platforms and include the
8 necessary functionality to effectively provide the service the Company's customers
9 expect. Example of short- and long-term benefits include:

- 10 • Improved customer experience by streamlining processes and systems;
- 11 • Ability to continually improve system functions, such as rate schedule billing,
12 by configuration as opposed to more expensive customizations under the
13 current CSS;
- 14 • Enhanced customer service processes that provide more accurate and timely
15 resolution of customer service requests;
- 16 • Ability to assist customers with guided actions based on analytical customer
17 data;
- 18 • Provide customers and employees with the capability to interact using the
19 communication device of the customer's choice (text, email, phone, mail). All
20 engagement channels will feel seamless when migrating from one to the other,
21 avoiding lost data or confusion for the customer;
- 22 • Include communication strategies integrated within solutions, minimizing
23 manual intervention, and real-time assignment of work to increase efficiencies
24 for employees and expedite successful outcomes for customers;
- 25 • Customers can choose to customize usage alerts through their choice of text,
26 email, or phone when their energy usage may move them into a higher and
27 more expensive tier;
- 28 • Updates outdated mainframe interfaces used by customer service agents to
29 improve efficiency including faster insights to better serve customers and
30 interact with field personnel;

