

Exh. WJC-1T  
Docket UE-230172  
Witness: William J. Comeau

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba  
PACIFIC POWER & LIGHT COMPANY

Respondent.

Docket UE-230172

**PACIFICORP**

**DIRECT TESTIMONY OF WILLIAM J. COMEAU**

**March 2023 (REFILED April 19, 2023)**

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

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

6 **I. QUALIFICATIONS**

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 and renewable energy, and  
12 since January 2020, I have served as Vice President of Customer Experience and  
13 Innovation. Through that role I oversee PacifiCorp's call centers, customer billing,  
14 customer technology tools (e.g., customer web account and mobile app) and customer  
15 programs.

16 **II. PURPOSE OF TESTIMONY**

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

18 A. I provide background on, and the need to upgrade, the Company's legacy Customer  
19 Service System (CSS).

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

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

22 A. Yes. PacifiCorp's existing CSS was placed in service in the 1990's. The initial CSS  
23 utilized IBM mainframe technologies and provided an integrated solution for the

1 Company's customer service needs, but the system was limited to supporting billing  
2 and customer care functions. The CSS currently supports, in various functions and  
3 capabilities, the Company's billing and relationship management of two million  
4 customers across our six-state service territories.

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

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

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

17 A. Yes. Due to the age of the current CSS system and the need to meet evolving  
18 customer expectations, CSS has reached its limits for performance, stability, security,  
19 upgrades, and technical support. The current hardware and software prohibit  
20 flexibility, integration, and forward adoption of new technologies. The IBM  
21 mainframes were invented and built to serve information technology needs in a pre-  
22 cellular phone and pre-widespread adoption of the internet business climate. Fast  
23 forward several decades, and the mainframes have limited ability to incorporate

1 modern services, advanced rate structures, or technologies. Focusing on interval  
2 meter data specifically, CSS lacks the ability to store and process large amounts of  
3 interval data.

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

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

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

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

19 A. Yes. While CSS has been a durable and hard-working system for the last several  
20 decades, it is time to replace and modernize the Company's information technology  
21 system. The current system has mainframe capacity issues, requires unnecessary  
22 complexity in managing system interfaces, is beginning to experience performance

1 problems, and often creates challenges to align support, patches and enhancements  
2 across multiple vendors.

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

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

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

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

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

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

23 A. The total forecasted project cost for the updated customer information system is

1 approximately \$136.8 million on a total-company basis, which translates to  
2 approximately \$9.7 million on a Washington-allocated basis.

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

5 A. The new CSS system will be based on current technology platforms and include the  
6 necessary functionality to effectively provide the service our customers expect.

7 Example of short- and long-term benefits include:

- 8 • Improved customer experience by streamlining processes and systems;
- 9 • Ability to continually improve system functions, such as rate schedule billing,  
10 by configuration as opposed to more expensive customizations under the  
11 current CSS;
- 12 • Enhanced customer service processes that provide more accurate and timely  
13 resolution of customer service requests;
- 14 • Ability to assist customers with guided actions based on analytical customer  
15 data;
- 16 • Provide customers and employees with the capability to interact using the  
17 communication device of the customer's choice (text, email, phone, mail). All  
18 engagement channels will feel seamless when migrating from one to the other,  
19 avoiding lost data or confusion for the customer;
- 20 • Include communication strategies integrated within solutions, minimizing  
21 manual intervention, and real-time assignment of work to increase efficiencies  
22 for employees and expedite successful outcomes for customers;

- 1 • Customers can choose to customize usage alerts through their choice of text,  
2 email, or phone when their energy usage may move them into a higher and  
3 more expensive tier;
- 4 • Updates outdated mainframe interfaces used by customer service agents to  
5 improve efficiency including faster insights to better serve customers and  
6 interact with field personnel;
- 7 • Addresses inflexibility issues in current systems that requires expensive and  
8 time-consuming custom changes;
- 9 • Addresses capacity and performance issues within the existing CSS ensuring  
10 system availability during high usage times (customer outages and events);
- 11 • Configurable systems to decrease the time and cost required to implement  
12 future customer and regulatory requirements; and
- 13 • Addresses manual complex billing issues, because complex bills (such as  
14 coincidental peak demand across multiple meters) cannot be calculated  
15 currently in CSS and are manually calculated—a labor intensive process that  
16 has the potential for human error.

17 **Q. What is the projected in-service date for the CSS replacement?**

18 A. The CSS replacement is currently projected to be in service in September 2025,  
19 though improvements and enhancements for efficiency and improved customer  
20 experience will continue after the initial in-service date.

## 21 V. CONCLUSION

22 **Q. Please summarize your testimony.**

23 A. Updating the Company's CSS replaces an outdated system with current technology



1 that will enable modern solutions to customer services support, customer  
2 correspondence, billing and settlement services, and customer relationship  
3 management, along with a foundation to efficiently assimilate new technologies and  
4 continually improve the customer experience. I recommend that the Commission  
5 include these costs in rates as prudent.

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

7 A. Yes.