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Preliminary Report for
Montana Public Service Commission (PSC)
Repair/Replace Electronic Database for Docket Information (REDDI)

Prepared For
Montana Public Service Commission

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II – Table of Contents

I – Title Page..... 1

II – Table of Contents..... 2

III – Introduction and Purpose..... 3

IV – Observations 4

V – Recommendations 7



III – Introduction and Purpose

On November 1st 2021 Reunion Consulting Group (RCG) was contracted by the Montana Public Service Commission (PSC) to assess the agency’s software needs and manage the procurement and implementation of a new and/or enhanced software solution to fulfill the agency’s technology needs for case management, data management, and customer relations. This project is known as the REDDI project (Repair / Replace EDDI).

The purpose of this brief initial report is to summarize RCG’s findings at the conclusion of the project’s Discovery Phase. These initial findings provide PSC with a set of recommendations for the REDDI project.

Phase 1 of the REDDI project is the Discovery Phase to assess the agency’s existing Electronic Database for Docket Information (EDDI) system with the goal of determining whether it can be repaired, or if it needs to be replaced.

Over the course of 2 months, the first phase of the REDDI project included several interviews with personnel across the PSC organization. Interview notes have been compiled to document requirements for the project, to record any issues with the current system, and to generate a set of recommendations for the agency.



IV – Observations

The PSC supervises and regulates public utilities, common carriers, and other regulated industries; it also makes its records open to public inspection. EDDI was built by Montana’s State Information and Technology Division (SITSD) and implemented in 2019 as a way to effectively support these functions, however RCG finds that EDDI is not sound and has never been fit for its intended purposes.

Since EDDI’s inception, the PSC has documented several technical flaws with the EDDI system and has reported these to SITSD for repair. The response from SITSD has been less than adequate, resulting in additional problems with the EDDI system and a continued lack of system performance to the point it has become unusable for most staff. The EDDI system’s performance is interfering with PSC staff’s ability to perform basic duties and has become an impediment for them to be able to effectively perform day-to-day work in its most basic form. For example, when EDDI was recently updated to address speed issues, the speed was improved, however the new code introduced a whole set of new errors in other areas of the system that previously worked. Similarly, a number of past repairs have also resulted in new errors.

Here is a brief summary of the most prominent unresolved system errors :

- EDDI takes between 30 seconds and 2 minutes per page load when the main queue is requested. This is costing several hours of PSC staff time daily and is the number one issue with the system at the time of writing.
- Dockets cannot be searched by using every available field.
- The system does not generate tracking numbers consistently when a complaint is submitted online.
- The system does not generate authority numbers consistently when a docket is generated.
- There is an inconsistency in the online portal where utility companies log in to upload their documents, sometimes the documents and dockets are generated correctly, other times the entirety of the uploaded data disappears



- The queues that have been set up for staff are not separated by job function, so all the docket are lumped into one giant queue which makes the system virtually unusable because of poor performance in loading the queue itself
- When drilling down into the detail of a particular docket that has attachments, the attachments sometimes do not come up even though they are visible within EDDI (clicking on the file to have it download results in nothing happening)
- There is a lack of reporting tools within EDDI. Lists or queues cannot be exported to produce a report and further, there is no option to filter the data in the queue to produce a refined list of dockets.
- There is no way to print the entire contents of a docket as a report, all the screens in EDDI must be printed individually by staff to provide the necessary documentation for the commission's review.
- EDDI specifications have a 4-gigabyte maximum allowable attachment file size limit, however, there has never been a file larger than 780 megabytes uploaded into the system by the public (anything larger results in a failure to successfully upload).
- EDDI Calendar: when deleting an event from the calendar, it stays on the calendar and shows up as "cancelled" instead of being removed from the view. Staff are unable to delete events from view in the back office, however, these events do not show up on the public side.
- EDDI Calendar: syncing with outlook fails, so staff are having to double enter the events both in EDDI for the public to see, and in outlook internally.
- EDDI generates automated emails for staff when they need to take action on a docket, however there is no detailed description of which utility or which docket number the notification is for, so there is no way for staff to know if they need to take action when an email notification arrives in their inbox, resulting in an inability to take full advantage of these notifications.
- There is no workflow system in EDDI. A docket can be assigned to multiple teams at the same time, they have no way of retrieving the docket they are working on without searching for it



every time. Teams do not have queues, and individuals do not have queues that work to display only their open and assigned dockets.

- EDDI has a poor functionality when it comes to segregating data within the system and has limited overall security functions to prevent unauthorized staff from viewing sensitive information in the back office. There are only 2 options, either a document is confidential, or it is not.

The above is a high-level list of current issues with the EDDI system and does not represent the entire list of documented issues. In addition to the issues listed above, EDDI does not adequately meet the requirements of all the divisions within the PSC. Three specific areas of the agency were ignored when the system requirements were written, and EDDI was programmed, and they are:

- Inspections: There is no functionality within EDDI to record inspection visits, and results. The inspectors have had to develop their own independent MS Access database to record Montana state inspection information, this is in addition to the federal inspection system they need to upload inspection data into.
- Legal: There is no area within EDDI to record and track PSC's legislative efforts (legislation is developed and documented entirely on paper) nor is there any functionality to record any litigation cases within EDDI (again, all done on paper).
- Consumer Assistance: During the initial EDDI project, a legacy consumer assistance database was prematurely deleted, and only a part of its entire dataset was migrated to a report screen within EDDI (known as the Tableau report). Not all the information was transferred over (e.g. phone number) so staff are having to piece together the information by relying on old lists stored as spreadsheets. When a call comes into consumer assistance, there is no way for staff to create a new record of the call within EDDI. They are having to document all the interaction within MS Word, and they then transfer some of the data to EDDI because EDDI is not configured to record these interactions. There are several other gaps within the EDDI system that pertain to the consumer assistance team which will need to be addressed in REDDI.



V – Recommendations

RCG is recommending not to attempt to repair EDDI and instead, to procure a platform-based case management system that will replace EDDI at first, and then be configured to address the gaps in functionality as described in the previous section of this report. We are recommending a case management system that can be configurable so that PSC staff with the necessary authorization and training would be able to maintain the system in the long-term, without relying on any outside vendors or any software development staff in order to make changes to the system. A platform-based case management system that runs in the cloud, assuming all the connection points have a good enough connection to the internet, would scale up automatically when the database increases in size, thereby eliminating any performance issues like the ones currently being experienced. It is not recommended to procure a commercial off the shelf (COTS) product for the PSC since these are hard-coded pieces of software that have a very limited degree of configurability, and any major changes would need to be paid for in the form of a change order since PSC does not own the code. It is also not recommended to request a new custom application be developed by SITSD for the same reasons.

RCG recommends the following Phases and high-level project milestones for implementing a new cloud-based case management platform system:

Phase 2:

1. RCG will create a Statement of Work (SOW) based on the requirements that have been gathered during the discovery phase that details the work to be done to implement a new system, including key definitions.
2. RCG will identify and aid PSC in evaluating feasible replacement systems and system integrators. RCG will make recommendations and revise SOW if needed.
3. RCG will assist the PSC to develop cost estimates for the REDDI implementation.



4. RCG will assist PSC in contract preparation and procurement of a cloud-based case management system software license and a system integrator to create REDDI.

Phase 3:

1. Stand up the case management system and start implementing a single functionality (e. g. consumer assistance complaint management) based on PSC's priorities.
2. Initiate a Minimum Viable Product (MVP) release that allows for a limited functionality (not covering all EDDI's functions) in production.
3. Add functionality via product increment releases: incorporate a new functionality, perhaps one that is currently being handled in EDDI. These releases will be well documented so that the PSC can refer back to see what was changed.
4. The System Integrator will perform a data conversion mapping with the help of the PSC and SITSD to complete the data conversion from the EDDI to REDDI.
5. Complete data conversion from ancillary databases to REDDI: MS Access databases, spreadsheets, etc.
6. Convert legacy documents to REDDI: this can either be done by connecting to SITSD's current FileNet document repository OR by migrating all legacy documents to REDDI.

At some point during Phase 3 it is recommended to shut down the portal access to EDDI itself, and to direct all traffic to the new REDDI portal. Throughout Phase 3, RCG will:

- Manage overall implementation, testing, and training for PSC as needed
- Verify contract performance and deliverables
- Verify functionality and performance of system components and final system

Phases 2 and 3, as outlined above, represent high-level project milestones that are recommended at this time to ensure a smooth transition as much as possible. Further discussions with PSC could result in a



different path but at this time, and given the current circumstances, RCG recommends this as the best path forward.