

Exhibit ___ (RK-9)
Dockets UE-111048/UG-111049
Witness: Roger Kouchi

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

**DOCKET UE-111048
DOCKET UG-111049
(Consolidated)**

**EXHIBIT TO
TESTIMONY OF**

ROGER KOUCHI

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE Response to Staff Data Request 88

December 7, 2011

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-111048 and UG-111049
Puget Sound Energy, Inc.'s
2011 General Rate Case**

WUTC STAFF DATA REQUEST NO. 088

WUTC STAFF DATA REQUEST NO. 088:

Re: Meter and Billing Performance

The Company's response to Staff Data Request No 68 states that it took an average of 38 days in 2010 to resolve a meter and billing problem once the problem was identified and an average of 67 days in 2011 (January – June) to resolve a meter and billing problem once the problem was identified.

1. Please explain why the time required to resolve meter and billing problems increased from 38 days an average in 2010 to 67 days on average in the first half of 2011
2. Please provide a flow chart of all steps involved in the resolution process, including the process of generating the service order, time to initiate a field investigation, and duration of the field investigation
3. Please list any additional steps the Company plans to take to reduce the time necessary to: a) identify its meter problems; and 2) reduce the time necessary to resolve its meter and billing problems.

Response:

1. In 2010 Puget Sound Energy, Inc.'s ("PSE") Automated Meter Reading ("AMR") provider made the decision to proactively repair 120,000 meter modules between late 2009 to mid-2010. Once the service order for the module repair was received from PSE's AMR provider (after the field work had already been completed), PSE entered the meter identification, read, and repair date information into the Meter Exception Management System ("MEMS"). This resulted in much faster identification and resolution of a back bill. Of the 120,000 module repairs, 1,719 back bills were generated. If PSE removed the back bills associated with these module repairs, the average number of days to identify and resolve the billing problem would have been 44 days, not 38, in 2010.

Additionally, through 2011 PSE has experienced an increase in the number of times a meter requires replacement after the initial inspection, compared to inspections resulting in meter replacement in 2010. PSE has not yet determined if this is an anomaly or a more systemic issue.

When PSE identifies a possible stopped meter through low or zero usage reports and analysis, a field inspection is ordered and performed to determine whether the issue is a malfunctioning module or meter. If the issue is only a malfunctioning module, the module is replaced or repaired during the inspection visit. If the module is not the only cause of the metering problem, a second field visit is required to replace the meter. When a case involves both an inspection and then a meter exchange, processing time increases by approximately 24 days.

2. Attached as Attachment A to PSE's Response to WUTC Staff Data Request No. 088, please find a flow chart illustrating PSE's zero consumption resolution process.

Please note that each case does not necessarily go into every work queue. For example, some cases only need a module exchange service order and would not enter queues such as the "Request Meter Exchange Service Order Creation" work queue. Other meters may not need billing corrections; therefore, those cases would not enter queues such as "Ready to Process Bill."

3. PSE is taking the following actions to reduce the time to identify meter problems and the time necessary to resolve meter and billing problems:
 - a. To shorten the time to identify potential meter/module malfunctions, PSE plans to expand the use of technology enablers. DataRaker Analytics uses automated meter reads to identify potentially stopped meters by analyzing changes in relatively small consumption patterns. A potential failed meter is identified after a ten-day period of low or zero consumption, but when the temperature drops to 32 degrees Fahrenheit, the analysis needs only a five-day period to identify potential failed meter/module candidates.

PSE is also performing a proactive review of irregular use customer meters (e.g., only meters providing swimming pool heat) in an effort to more quickly identify malfunctioning meters.
 - b. PSE is investigating potential process changes to determine if they would shorten the length of time to resolve meter and back billing issues. Two efforts are underway:

1. At this time the way in which the metering/back billing work is organized focuses on addressing 50 percent of gas issues within two calendar months of identification, with the remaining balance resolved within 120 calendar days; and 75 percent of the electric issues within one calendar month of identification, with the remaining balance resolved within 60 calendar days. PSE wants to ascertain whether or not the present process may inadvertently cause postponement of some work to meet the bulk (50-75 percent) levels, which adversely impacts its overall resolution times.

PSE is studying whether or not it could shorten resolution times if work were organized using a "first-in, first-out" method. Depending upon the outcome of the analysis, PSE would then take steps to pilot a process change, before making a holistic modification.

2. PSE is also exploring whether or not some of the office review activities could be automated within the existing Customer Information System (CLX) and if so, the cost to perform the software changes. Feasibility, estimated cost and personnel needed to complete the effort will impact whether or not PSE pursues this action.

Beyond working on shortening the time to identify and resolve metering/billing issues, PSE is considering a pilot to field test a newly designed meter module – to determine if its performance would be superior to the components currently in use. The newly-designed modules are being tested within a shop environment and assuming testing is successful, a limited pilot installation may be deployed in 2012.