



The Energy To Do Great Things

Puget Sound Energy  
P.O. Box 97034  
Bellevue, WA 98009-9734  
PSE.com

March 23, 2015

**Via Electronic Mail**

Steven V. King, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
1300 S. Evergreen Park Drive S.W.  
Olympia, Washington 98504-7250

Re: **Docket U-144155: Comments of Puget Sound Energy, Inc. on Rulemaking to Consider Amending Billing Requirements for Electric and Natural Gas Companies**

Dear Mr. King:

Puget Sound Energy, Inc. ("PSE") submits the following comments in response to the request in the Washington Utilities and Transportation Commission's Notice of Opportunity to Submit Written Comments issued in Docket U-144155.

- 1. Please provide the average number of meters in service from 2012 to 2014.**

PSE Response:

Meters in Service (based upon year-end customer schedule count)		
2012	2013	2014
1,870,575	1,883,448	1,904,966

- 2. Please provide three years of historical data showing the following: (Please use format provided in table below.)**
  - a. Total number of retroactive bills and length of the retroactive bills for stopped meters.**

PSE Response:

The counts are for accounts with a stopped meter identified and rebilled			
# of Months Retroactively Billed	Number of Accounts		
	2012	2013	2014
Less than one month	620	64	123
1	888	318	307
2	1,035	532	404
3	491	578	493
4	298	439	354
5	215	267	235
6	90	173	188
7	90	94	119
8	103	66	100
9	55	50	66
10	57	47	52
11	57	34	70
12	36	36	46
13	39	51	40
14	29	34	28
15	27	21	19
16	30	17	27
17	15	4	31
18	4	9	7
19	13	8	8
20	8	3	6
21	8	7	4
22	11	3	1
23	2	3	3
24	7	5	4
25	2	3	2
26	9	9	4
27	9	8	6

The counts are for accounts with a stopped meter identified and rebilled			
# of Months Retroactively Billed	Number of Accounts		
	2012	2013	2014
28	9	3	2
29	5	-	4
30	5	2	4
31	7	-	4
32	3	1	3
33	3	1	-
34	4	1	3
35	3	2	2
36	2	1	2
37	1	3	-
38	2	3	-
39	1	1	1
40	1	-	-
41	3	-	1
42	2	-	1
43	2	-	-
44	-	1	-
45	3	-	-
48	1	-	-
49	1	1	-
50	1	-	-
51	2	-	-
52	-	-	-
53	-	-	-
54	-	-	-
55	1	-	-
56	2	-	-
57	1	-	-
58	1	-	-
59	1	-	-

The counts are for accounts with a stopped meter identified and rebilled			
# of Months Retroactively Billed	Number of Accounts		
	2012	2013	2014
60	-	-	-
61	-	-	-
62	-	-	-
63	2	-	-
64	1	-	-
65	1	-	-
66	-	-	-
67	-	-	-
68	2	-	-
70	2	-	-
71	8	1	-
72	2	-	-

**b. Total number of unidentified energy usage meters.**

PSE Response:

The counts are for accounts with unidentified energy usage and rebilled			
# of Months Retroactively Billed	Number of Accounts		
	2012	2013	2014
Less than one month	1,958	2,657	1,740
1	2,693	3,609	2,464
2	1,948	2,303	1,784
3	995	1,400	963
4	597	914	615
5	350	607	452
6	248	387	262
7	146	248	195
8	75	151	139
9	70	68	130
10	47	37	103

The counts are for accounts with unidentified energy usage and rebilled			
# of Months Retroactively Billed	Number of Accounts		
	2012	2013	2014
11	39	47	40
12	21	35	32
13	15	27	20
14	17	10	16
15	10	12	17
16	15	7	15
17	7	8	4
18	10	3	8
19	10	1	12
20	8	1	9
21	2	3	8
22	3	-	3
23	3	-	1
24	4	-	1
25	2	4	-
26	4	-	-
27	2	-	-
28	2	3	-
29	4	1	-
30	2	-	2
31	2	1	4
32	2	2	1
33	-	-	1
34	2	1	-
35	2	2	-
36	-	-	-
37	-	1	-
38	-	-	-
39	1	1	-
40	-	-	-

The counts are for accounts with unidentified energy usage and rebilled			
# of Months Retroactively Billed	Number of Accounts		
	2012	2013	2014
42	2	-	-
46	1	-	-
50	-	1	-
51	-	1	-
96	1	-	-
105	1	-	-
120	1	-	-
134	1	-	-
169	1	-	-

**3. What is the company’s policy regarding bill settlement for metering errors?**

PSE Response:

PSE works with individual customers to settle bill estimation issues related to billing disputes. If a customer is disputing the estimated meter reads used in the billing adjustment, PSE will take the usage related information provided by the customer along with PSE’s estimated usage and available actual usage into account in order to determine the revised estimated meter reads.

**4. Does the company have a billing threshold before investigating zero-read meter readings or unidentified energy usage? If so, please provide information on the company’s minimum billing threshold.**

PSE Response:

Stopped meter: At any given time a large number of meters (particularly gas meters) on PSE’s system may show no usage but are valid zero consumption meters. As a result PSE, like other utilities, face the challenge of filtering “valid zero-consumption” meters from zero-consumption usage due to a stopped meter.

- PSE has the following thresholds used to trigger a stopped meter billing investigation:

- When a customer's bill has shown no usage from one billing period to the next, PSE's customer information system (CIS) identifies the account and creates a service notification in CIS for follow up
- A service notification can also be created if PSE's DataRaker query, a meter performance and customer usage analysis tool, identifies that a meter module malfunction has occurred based upon the meter reads, weather data, and individual customer usage pattern. The DataRaker query is able to identify a probable stopped meter within 3 days when the temperatures dip to below freezing or in a 5-10 day window when the temperatures are above freezing.
- PSE has the following thresholds used to trigger an investigation of a meter with unassigned energy usage (UEU):
  - Natural gas:
    - A letter is sent to the occupant of the location if the cumulated usage reaches 86 CCFs or if the unassigned energy usage has been detected for 270 days but the 86CCF usage threshold is not reached.
    - A service notification is generated if the cumulated usage reaches 100 CCFs or it has been 45 days since the letter was sent (with no customer response) or it has been 300 days since the initial detection if the 100-CCF usage threshold has not been reached.
  - Electric:
    - Residential customers
      - A letter is sent to the occupant of the location if the cumulated usage reaches 425 KWH or if the unassigned energy usage has been detected for 270 days but the 425-KWH usage threshold has not been reached.
      - A service notification is created if the cumulated usage reaches 800 KWH or it has been 45 days since the letter was sent (with no customer response) or it has been 300 days from initial detection but the 800-KWH usage threshold has not been reached.
    - Commercial/industrial customers
      - A letter is created if the cumulated usage reaches 6,000 KWH or it has been 270 days since the initial detection but the 6,000-KWH usage threshold has not been reached.

- 5. A service notification is created if the cumulated usage is more than 7,150 KWH or it has been 45 days since the letter was sent (and no customer response has been received) or it has been 300 days since the initial detection but the 7,150-KWH usage threshold has not been reached. Does the company have specific goals regarding the identification and resolution of stopped meters and unidentified energy usage meters?**

PSE Response:

PSE's current goals for meter and billing performance are:


- PSE will identify and correct 98 percent of all stopped meter and unassigned energy usage meter problems for both gas and electric meters within 12 months from initial occurrence of the problem.
  - PSE will identify and correct all stopped meter and unassigned energy problems for both gas and electric meters within 24 months from the initial problem.
- 6. What types of reports does the company generate to help identify stopped meter and unidentified usage meter problems?**

PSE Response:

PSE has several tools to assist in the identification of stopped and UEU meters as discussed in PSE's response to Question No. 4 above.

PSE appreciates the opportunity to provide responses to the questions identified in the Commission's Notice of Opportunity to File Written Comments. Please contact Mei Cass at (425) 462-3800 or Kathie Barnard at (425) 462-3716 for additional information about this filing. If you have any other questions please contact me at (425) 456 2110.

Sincerely,

  
Ken Johnson  
Director, State Regulatory Affairs