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Washington Utilities and Transportation Commission
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COMMISSION

Re: Docket U-180525: Comments of Puget Sound Energy on Draft Consumer Protection and Meter Related Rules and Additional Questions regarding Commission Rulemaking to Modify Existing Consumer Protection and Meter Rules to Include Advanced Metering Infrastructure.

Dear Mr. Johnson:

Puget Sound Energy (“PSE” or “the Company”) appreciates the opportunity to respond to the questions proposed in this docket and submits the following comments in response to the request in the Washington Utilities and Transportation Commission’s (“Commission”) Notice of Opportunity to File Written Comments issued in Docket U-180525 (“Notice”) on December 21, 2018.

As noted in our previous comments, PSE has recently begun to exchange its aging automated meter reading (“AMR”) electric meters and natural gas AMR modules for more advanced meters and modules. This advanced metering infrastructure (“AMI”) project mitigates the risk of aging AMR metering infrastructure and provides the foundation for PSE to pursue operational efficiency and enhanced customer service. AMI capabilities and benefits require the near full-deployment of advanced metering infrastructure. PSE’s comments begin with some high level concerns, followed by responding to the Commission’s questions, followed by PSE’s proposed redlines to the informal draft rules provided as Attachment A of the Notice.

General comments

PSE's comments on the proposed rules are focused primarily on notification, remote disconnection, and privacy.

Notification

PSE appreciates that the proposed rules acknowledge electronic notification processes may be used in addition to written notification. The rules should be clear throughout subsection (4)(a)(i) of WAC 480-90-128 and 480-100-128 that mailing is an adequate form of notification, and that site visits to the service premises are generally not required prior to remote disconnection, unless a specified exception applies.

Remote Disconnection

The proposed rules require a utility to “visit the customer’s premises and provide the customer with an opportunity to pay...” prior to disconnecting a customer who has either had medical emergency verified in the prior two years, or has received low-income assistance in the prior two years. However, it is unclear to PSE why this site visit is required for customers who have received any type of low-income assistance in the past two years. What objective is served by requiring a site visit prior to disconnection, if the customer has been properly notified and has several available methods to pay prior to the stated disconnection date?

PSE will not know, and will have no way to verify, if a particular customer has received low-income assistance that is not sponsored by the utility. More importantly, it is highly unlikely that PSE will have access to, or be in any position to evaluate, the nature or current status of any “medical emergency.” Utilities are not – and should not be – in a position to gather or evaluate such information.

Furthermore, PSE is concerned that requiring a site visit prior to disconnection of certain types of customers could have unintended consequences, such as encouraging utility scamming behavior (i.e. where a scammer shows up at the door, posing as a PSE employee and demanding immediate payment from the customer to avoid so-called disconnection). These types of scams are prevalent in our service territory.

PSE already has protections in place for low-income customers seeking assistance from utility-sponsored programs, which include PSE Home Energy Lifeline Program (HELP) and the Warm Home Fund, as well as established procedures which allow the customer a grace period for receipt of payment to avert a disconnection until such time as they’ve scheduled an appointment for an energy assistance grant. We are working with the energy assistance agencies, the Department of Commerce and The Energy Project to simplify the process for applying for energy assistance grants from LIHEAP and PSE HELP.

Similarly, PSE also has protections in place for customers who are dependent upon life-supporting functions requiring electric service. For those customers, there is an indicator in our system, which would allow us to identify those customers and have them go through our exception process. PSE also has a regulatory defined payment arrangement for a temporary

medical need in the home, which we refer to as “medical emergency.” Medical emergency is short-term, and the payment arrangement is for 120 days with no disconnection due to medical need for 60 days.

In addition, beginning in 2019, PSE will be implementing easier ways for customers to pay via a simplified third party payment process with more localized locations or via electronic means.

PSE already has adequate protections in place, and prefers the rules provide for a consistent, predictable approach to remote disconnection. This approach will ultimately benefit all customers in terms of lower costs and a more predictable customer experience. Requiring a site visit increases costs to the utility by requiring additional utility service personnel to visit those customers when operationally it will no longer be necessary. If proper notification of remote disconnection has been provided, then remote disconnection and reconnection should be permissible, predictable and consistent. Therefore, we suggest that subsection (c) and (d) be deleted in the proposed rules.

With respect to customer-directed disconnection of service, remote disconnection should be allowed under all circumstances. However, it is unclear if that is intended in the proposed changes to WAC 480-100-128(1). The first sentence states that the utility may require customers to give at least three days’ notice prior to the date service is to be discontinued “by dispatched utility personnel.” This sentence assumes that site visits will still be made to disconnect service. The second sentence states that the utility may require customers to give four-hours advance notice for customers serviced through a meter with remote disconnect capability – which implies that remote disconnection could be allowed under some circumstances when: (1) disconnection is requested by the customer; and (2) the customer has a meter capable of remote disconnection. PSE requests that this section be rewritten to be clear that the first sentence applies to meters not capable of remote disconnection or customers for which the utility elects to send utility personnel to the site in order to discontinue service.

Additionally, PSE has a number of clarifying questions regarding remote disconnection as outlined in subsection (6)(a) of WAC 480-100-128. First, the proposed rule requires the utility to set “a reasonable number of remote disconnections per 24 hour period, which its system cannot exceed, or take other reasonable measures to prevent unauthorized disconnections.” How should a utility determine what is a “reasonable” number of remote disconnections in a 24 hour period? What constitutes “other reasonable measures to prevent unauthorized disconnections?” If the utility has internal procedures in place to prevent disconnections from occurring that do not comply with the notification and disconnection rules, does that constitute “reasonable measures to prevent unauthorized disconnections,” which would then relieve the utility of the obligation to “set a reasonable number of remote disconnections per 24 hour period, which its system cannot exceed?” Or, is the rule suggesting some sort of formal authorization process for determining whether remote disconnection is “authorized?”

Finally, the proposed rules state for reconnection that utilities must make “every reasonable effort” to restore customers “serviced through a meter with remote connection ability” within

four hours. This time frame likely is unrealistic and better addressed after AMI is fully deployed. Once AMI is fully deployed across the service territory, reconnection of service can be accomplished much more quickly than it is today. At that time, it would be appropriate to revisit the possibility of mandated time frames for reconnection. Until then, requiring utilities to perform remote reconnections within four hours – day or night – is unduly burdensome and likely would require additional resources to accomplish.

Privacy

PSE appreciates and shares the Commission's interest in protecting customers' personal data and believes the existing rules pertaining to the sharing of customer data provide adequate protection. Any changes to the rules regarding protection of personal data should be subject to a "commercially reasonable" standard to ensure that PSE will be able to comply

Additionally, any changes to the rules regarding personal data collection should still allow utilities to collect any personal data that customers agree to provide, and should be flexible enough for utilities to collect data that will assist in evaluate existing services and developing new services.

Commission's Questions:

1. What types of certification are available for meters?

There are many types of certification that a meter may have, from manufacturer certification that the device conforms to the Federal Communications Commission (FCC) regulations to certification from United Laboratories (UL) to being certified to conform to ANSI standard C12.1, to being certified as functioning with a third party application.

2. How is meter accuracy tested?

As stated in previous comments, PSE follows current WAC rules for testing of meters. The Company maintains its compliance with these rules for all meters, i.e. both existing AMR meters and those meters equipped with AMI technology. As these meter standards apply to the physical meter and the fact the natural gas meter is not changed out while the attached communication module is changed from an AMR model to an AMI model, PSE requires that natural gas meters conform to these accuracy requirements when supplied with any communication module (AMR or AMI).

The WAC rules covering meter testing include:

- WAC 480-90-343 for Gas Meter Test Procedures
- WAC 480-90-333 for Gas Initial Accuracy
- WAC 480-90-338 for Gas Meter Tolerance
- WAC 480-100-343 for Electric Meter Test Procedures
- WAC 480-100-333 for Electric Initial Accuracy
- WAC 480-100-338 for Electric Accuracy Requirements for Electric Meters

As prescribed in WAC 480-90-343 and WAC 480-100-343, PSE includes statements on test procedures in its natural gas and electric tariffs. For natural gas meters, PSE's natural gas tariff WN U-2, Rule No. 25-Meter Testing Procedures, Section 2.2 covers the accuracy testing of the natural gas meters. It states that meters will meet or exceed ANSI standards B109.1, B109.2, and B109.3. Section 3.3 of Rule No. 25 states that the minimum acceptable accuracy for all new and rebuilt natural gas meters is 100 percent +/- 1 percent at specified flow rates.

PSE's electric tariff WN U-60, Schedule 80- General Rules and Provisions, Section 20.b covers PSE's electric meter test procedures. These procedures extend to all meter types. The testing procedures follow ANSI standard C12.1 and use the most recent revision of ANSI/ASQC-Z1.9. New meters are tested to be at 100 percent +/- 0.5 percent accuracy. In-service meters are tested to ensure they are within the tolerances allotted in WAC 480-100-141 at the individual meter level, and that the set acceptable quality level is not exceeded for any meter population.

3. Are there concerns related to power quality that could affect performance and accuracy of the meters?

Power quality issues can be rooted in a wide array of causes, including environmental influences, customer equipment settings, supply interruption and operation of protection equipment. PSE has no specific concerns that would result in a systemic issue with performance or accuracy of its meter populations at this time.

4. Please refer to Attachment B. In the article, Challenges for Smart Electricity Meters due to Dynamic Power Quality Conditions of the Grid: A Review, the author states, "The understanding of the relationship between power quality and the accuracy of electricity meters is useful to evaluate the impact of including a standardized procedure to properly calibrate meters under distorted waveform. Further and continuous investigation is required to minimize the error of electricity meters under any possible working condition. The current permissible error in applicable accuracy related standards could be a cause of significant revenue losses for utilities."

a. Does the company know of any modification to current standards to address this issue?

PSE follows applicable standards and incorporates these standards into its work practices to identify and mitigate power quality disturbances and steady state variations.

Apart from work mentioned in the article on IEEE 1459, PSE is not aware of any modification to current standards. PSE would be supportive of any modifications to standards that improve safety, efficiency or accuracy of electricity meters.

b. Do companies know of any circumstance where meter readings are not accurate? If inaccuracy of meters is known under certain circumstances, what circumstances trigger the inaccuracy? What can Companies do to correct this problem?

Electromechanical meters can slow down, speed up, or stop over time. Many factors can cause inaccuracy, including aging or failing meter parts, customer equipment issues, or meter tampering.

Utilities can detect inaccuracy with interval data and appropriate analytics applications that identify and flag implausible billing reads or trends in usage. Overall accuracy trends across a large meter population can be plotted with regular sample testing of the meters. PSE uses both of the above methods to mitigate any inaccuracy.

c. Does the company know if the meters have been tested for current waveform distortion caused by LED, CFL, and dimmers?

Testing for waveform distortion is not included in PSE's current testing standards.

d. Are meters tested in their capability to measure accurately under distorted waveform conditions?

PSE currently follows laboratory testing conditions and techniques included in the latest revision of ANSI C12.1.

5. Has the company considered adopting standard ANSI C12 – Smart Grid Meter Package? Please provide the rationale for your response.

PSE follows ANSI standards where applicable in its operations, including ANSI C12. PSE updates its business processes to reflect updates in these standards.

6. Do companies have restrictions in tariff or in practice for disconnecting service during times when the temperature will be low or high? If so, please describe.

PSE does not have tariff restrictions for disconnecting service when the temperature is expected to be low or high. PSE has historically placed a moratorium on disconnections if the high temperatures are expected to be in the 30's or the lows are expected to be in the 20's or teens. This historical practice strictly has been a courtesy for the well-being of our customers and their property.

7. Public Counsel suggests limiting disconnections for non-payment on days that are forecast to be 32 degree Fahrenheit or less.

a. What are the advantages of this limitation?

This is already in practice at PSE so there is no advantage to this limitation. If such a limitation is to be prescribed by rule, PSE suggests that a clear standard be identified as to the source to be relied upon for temperature, whether the restriction applies to a forecast low or a forecast average, and what metric is used (i.e. system average, for example).

b. What are the disadvantages of this limitation?

This is already in practice at PSE, so there are no disadvantages associated with this limitation. As noted in response to the previous question, if such a limitation is to be prescribed by rule, PSE suggests that a clear standard be identified as to the source to be relied upon for temperature, whether the restriction applies to a forecast low or a forecast average, and what metric is used (i.e. system average, for example).

c. Should Washington restrict disconnections during cold weather? If so, describe alternative policy recommendations.

No, PSE already has this practice in place. We do not have alternative policy recommendations at this time.

8. In regards to placing limitations on the time of day utility service can be disconnected remotely, what does a policy look like that would allow the customer time to resolve the reasons of the disconnection on the same day?

PSE's current timeframe for disconnects is between 8:30 AM and 3:30 PM Monday through Friday. This allows the customer time to resolve their past due balance and be reconnected within 24 hours as per the WAC. Many reconnects are done the same day and PSE has a contingency staff working on Saturdays from 7:30 to 4:00 company-wide to perform reconnects as necessary. PSE will need to evaluate if a change in current practice is necessary.

a. Does the utility have a policy to temporally delay a disconnection, if the dispatched utility representative finds a vulnerable resident such as, but not limited to a low-income resident or a resident with a medical issue (who has not declared a medical emergency)?

PSE's employees are neither trained nor qualified to make such an assessment, and they are not instructed to do so.

b. On average, what percentage of utility customers are disconnected per day? Please include all disconnections, not just those directed by the utility with notice. Please provide electric and gas customer information separately.

The average percentage of electric customers disconnected per day in 2017 was 0.0207%. The average percentage of gas customers disconnected per day in 2017 was 0.0173%. Both percentages reflect all disconnections, not just disconnections directed by the utility with notice.

9. When a customer is disconnected for non-payment, how long will the company take to remotely reconnect service after payment has been received? Will service be reconnected the same day?

PSE's policy is to reconnect after disconnection within 24 hours. In many cases, service is reconnected the same day.

10. Do you currently reconnect service 24 hours a day, seven days a week? If not, what is your practice?

PSE's practice is to perform reconnects Monday through Friday from 8:30 a.m. to 4:00 p.m. and on Saturday from 7:30 a.m. to 4:00 p.m.

11. Should companies be allowed to collect and release, with no restrictions, aggregate load information that enables the identification of customer class consumption behavioral patterns?

Consistent with our previous response regarding the use of aggregate data, PSE maintains that aggregate load information that does not include individual customer information should not be restricted for utility use.

PSE's Suggested Revisions or Clarifications to the December 21 Proposed Rules:

Comments are provided in chronological order (starting on pg. 1 of the proposed rules).

1. Proposed WAC 480-90-023 and WAC 480-100-023: Definitions

The proposed definition of "aggregate data" may be too restrictive. PSE suggests the following changes to the definition to address situations in which someone appends outside information to an aggregate data set, and an individual may be inadvertently identified despite significant efforts to avoid identification.

"Aggregate data" means any personally identifiable information from which all identifying information has been removed or modified so that the personal information is rendered unreadable, unusable, or undecipherable by an authorized person and cannot reasonably be attributed to any individual customer.

Secondly, the proposed definition of “personally identifiable information” seems too broad and should be refined. This definition should include information that is linked or reasonably linkable to an individual, and could potentially mirror WAC 480-90-153(6), which reads: “information from which a third party could reasonably deduce the identity of the customer or customers from whom such data is collected.” The list of exemplars should read “potentially including information related to the quantity. . .” to account for an outcome-based evaluation of whether information is identifiable or not, instead of the current language which reads “including information related to the quantity. . .”

PSE prefers the approach taken in the existing rule through the definition of “private customer information,” which is less generic and more tailored to the nature of the service we provide to the customer.

Additionally, it is unclear what is meant by including information that can be used “to trace” an individual. To reduce ambiguity, the phrase “to trace” should be removed. Furthermore, this definition refers to “products subscribed to by a customer,” which may not be accurate. A better way to phrase this might be “take service.”

2. Proposed WAC 480-100-128: Disconnection of Service

Notification

PSE proposes the following technical change to Proposed WAC 480-100-128(1) addressing customer-directed disconnection of service:

- (1) **Customer-directed.** The utility may require customers to give at least three-days’-notice prior to the date service is to be discontinued by dispatched utility personnel. The utility may require four-hour advance notice for from customers serviced via a meter with remote disconnect capability.

Additionally, we suggest that the word “any” be added to Proposed WACs 480-90-128(2) and 480-100-128(2) addressing utility-directed disconnection of service with notice:

(23) Utility-directed with notice. After properly notifying the customer, as explained in subsection (46) of this section, the utility may discontinue service for **any** one of the following conditions:

- (a) For delinquent charges associated with any regulated electric service...

Proposed WACs 480-90-128(2) and 480-100-128(2) outlines the conditions under which the utility may discontinue service after properly notifying the customer. PSE suggests that the condition outlined in subsection (2)(f) should also include equipment that may result in detrimental impacts to safety:

(f) For the use of equipment that detrimentally affects the utility’s service to its other customers, **or may result in any detrimental impacts to safety**

PSE requests some clarifying edits in Subsection (4)(a)(i) of WAC 480-90-128 and 480-100-128 to make it clear that the first written notice can be provided by mail or by personal delivery. The remainder of subsection 4(a)(i) that discusses the time frames in the notice implies that mailing the notice is sufficient, but the first sentence in subsection (4)(a)(i) implies that the notice needs to be delivered to the service premises and does not specify mailing as a form of delivery. This subsection could be revised as follows:

(i) The utility must provide the first written disconnection notice by email, text, or other electronic communication, if the utility has such contact information for the customer, and by **either mailing the notice or by personal delivery of a hard copy of the notice** to the service premises. The notice must include ~~A~~ a disconnection date that is not less than eight business days after the date of personal delivery the utility either delivers the notice to the service premises and attaches it to the customer's primary **any** door or mailing mails the notice, if the utility mailed the notice from inside the states of Washington, Oregon, or Idaho, ~~or a~~.

Additionally, in Subsection (4)(a)(i) of both Proposed WACs, PSE requests that the term “primary” be defined or deleted as follows:

(i) ...The notice must include ~~A~~ a disconnection date that is not less than eight business days after the date of personal delivery the utility either delivers the notice to the service premises and attaches it to the customer's primary **any** door or mailing mails the notice, if the utility mailed the notice from inside the states of Washington, Oregon, or Idaho, ~~or~~ a.

Regarding disconnection notices in subsection (4)(b)(i) of both Proposed WACs, PSE requests the following technical edits for clarity:

(i) ~~†~~The cause for disconnection; the amount owed for **any** regulated electric service and, if applicable, **any** regulated natural gas service; and how to avoid disconnection;”

Additionally, in Proposed WAC 480-100-128(4)(b)(iv) only, PSE suggests the following technical edits:

(iv) If the utility will be disconnecting via a remote disconnection device, the notice must include a ~~clear~~ statement that utility personnel will not come to the premises to perform the disconnection.

In subsection (4)(k)(iii) of WAC 480-100-128 only regarding remote disconnection of medical facilities, PSE proposes the following change:

(iii) Utilities cannot remotely disconnect customers who **have demonstrated to the utility that they** provide the services described in (k)(i) and (k)(ii) of this subsection.

Remote Disconnections

To address the ambiguity in subsection (6)(a), PSE suggests the following changes:

(6) Remote Disconnection for non-payment. When disconnecting services remotely, the utility must:

~~(a) Set a reasonable number of remote disconnections per 24 hour period, which its system cannot exceed, or~~ Take other reasonable measures to prevent unauthorized disconnections;

Additionally, subsection (6)(b) limits remote disconnection for non-payment between the hours of 8 a.m. and noon. Currently, PSE disconnects service up until 3 p.m., Monday through Friday. We suggest that remote disconnections also should be permissible until 3 p.m. on weekdays.

PSE suggests that in subsection (6)(c) and (d) regarding payment prior to remote disconnection for customers who have had a medical emergency or have received low-income assistance in the prior two years, the term “appropriate methods” should be defined.

As noted earlier in our general comments, PSE recommends the site visit requirement for “a customer who has received low-income assistance in the prior two years” should be removed because it is overly broad and would be difficult for utilities to implement. Adequate protections are already in place for low-income customers under the current rules, and requiring a site visit prior to disconnection would increase costs for utilities, because it would require additional utility personnel to perform these site visits.

In the alternative, if a site visit for certain low-income customers is still desired, PSE suggests limiting the site visit requirement to those customers who have received utility-sponsored low-income energy assistance, such as receipt of LIHEAP, PSE HELP and/or the Warm Home Fund. These are customers that PSE can identify and track in our system.

In subsection (7)(a) regarding utility-directed disconnection without notice or without further notice, PSE suggests removing language regarding the utility’s burden of proof for fraud, which has no bearing on this provision:

~~(a) After conducting a thorough investigation, the utility determines that the customer has tampered with or stolen the utility’s property, has used service through an illegal connection, or has fraudulently obtained service. The utility has the burden of proving that fraud occurred.~~ For the purpose of this section subsection, a nonsufficient funds check or dishonored electronic payment alone will not be considered fraud.

Additionally, the proposed rules state for reconnection that utilities must make “every reasonable effort” to restore customers “serviced through a meter with remote connection ability” within four hours. Once AMI is fully deployed across PSE’s service territory, reconnection of service can be accomplished much more quickly than it is today. It would be more appropriate to revisit the possibility of shorter time frames for reconnection after AMI is fully deployed. Until then,

requiring utilities to perform remote reconnections within four hours – day or night – is unduly burdensome and likely may require additional resources to accomplish.

Regardless of the time frame for remote reconnection, this requirement for timely remote reconnection should only apply to meters that have been disconnected remotely, not to all meters that have the remote connection ability. Additionally, this provision should clarify that remote reconnection is expected once the customer has paid or once any technical issue has been resolved.

3. Proposed WAC 480-90-153 and WAC 480-100-153: Protection and Disclosure of private information

The following comments apply equally to proposed WAC 480-90-153 and WAC 480-100-153 regarding customer data.

As drafted, WAC 480-90-153(1) and WAC 480-100-153(1) require utilities to protect personal data “to the maximum extent possible;” however, this is not a commercially reasonable standard. There may be methods to protect data that are technically possible but not commercially viable, either due to cost or to the limits such protections would place on data usability. The standards of protection should be “commercially reasonable taking into account the relative sensitivity of the data,” which conforms to the type of standard typical of data protection statutes.¹

Subsection (2), which limits utility personal data collection to that which is “necessary for the utility to provide services to customers” is drafted too narrowly. Utilities, at the very least, should be allowed to collect data that customers agree to provide. There should also be language allowing utilities to collect data for the development of new services and for research.

Subsection (3) should allow utilities to share data with affiliates, subsidiaries, or parent organizations if customers agree to provide it, like any other company.

Subsection (4) should allow utilities to share data with third-party vendors at least “to the extent necessary for the utility to perform duties directly relating to the utility’s primary purpose” as opposed to the proposed language, which reads “only to the extent necessary for the utility to provide services to its customers.”

While utilities maintain certain responsibilities for the safeguarding of personally identifiable information the utility discloses to affiliates, subsidiaries, parent corporations, or third-party vendors, subsection (5) should be limited to imposing contractual obligations and potentially compliance reviews. It is unreasonable and not in line with other U.S. privacy laws, such as Federal Trade Commission Section 5 enforcement, to apply strict liability for lapses of third parties. Subsection 4 already requires that “all third-party vendors that have access to personally

¹ See, e.g. Article 32 of the EU General Data Protection Regulation.

identifiable information have policies, procedures, and technological safeguards in place sufficient to prevent the misuse or improper or unauthorized disclosure of such information.”

The exemption in subsection (9) should be broadened to include disclosures by customers to third parties with which PSE has a relationship (e.g., Amazon Web Services) if the disclosure is unrelated to PSE, as well as instances where customers specifically instruct PSE to disclose personally identifiable information on their behalf to third parties.

Customer rights to revoke authorization for PSE to transfer personally identifiable information to third parties outlined in subsection 11 should be clearly limited to sharing or sale to third parties for marketing purposes. There should also be a grace period of at least 10 days for utilities to implement a customer instruction to revoke consent, which would be in line with other U.S. opt-out rules such as the CAN-SPAM Act for email marketing.

Subsection 16 should allow utilities to implement reasonable procedures to verify customer identity before providing access to customer personally identifiable information.

Subsection 19 places an unreasonable expectation on utilities to respond to customer data access requests within 5 days. The California Consumer Privacy Act, for example, gives 45 days to respond to such requests. We suggest a similar time frame for response.

4. Proposed WAC 480-90-178 and 480-100-178: Billing requirements

Subsection (e) of Proposed WACs 480-90-178 and 480-100-178 address billing requirements. Some bills are currently provided on a bi-monthly basis. All references to monthly billing and monthly meter reading should also include bi-monthly (once every two months) meter reading and billing as follows:

(e) Show the current and previous **bi-monthly or** monthly meter readings, the current **bi-monthly or** monthly read date, and the total amount of kilowatt hours used for the billing cycle, provided that the customer bill must only provide the meter reading and read date for the final reading for the **bi-monthly or** monthly billing cycle; the bill need not include interval readings, although customers must be provided access to their consumption data in accordance with WAC 480-100-153

5. Proposed WAC 480-100-318(5) and (6): Meter readings, multipliers, and test constants

PSE is unclear on the objective of adding an annual reporting requirement and proposes the following change to Proposed WAC 480-100-318(6) regarding reporting for electric meters:

(6) Utilities must submit annual reports of the daily measurements aggregated by month and customer class.

Additionally, the term “commercially acceptable” should be either defined or deleted from the proposed rule.

PSE appreciates the opportunity to provide responses to the questions identified in the Commission’s Notice of Opportunity to File Written Comments and we look forward to participating in both the upcoming public comment hearing scheduled for February 21, 2019 and the workshop scheduled on March 13, 2019. Please contact Kara Durbin (425) 456-2377 or Spencer Jones at (425) 457-5382 or Nate Hill at (425) 457-5524 for additional information about these comments. If you have any other questions please contact me at (425) 456-2142.

Sincerely,

/s/ Jon Piliaris

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