

**BEFORE THE
WASHINGTON UTILITIES & TRANSPORTATION COMMISSION**

In the Matter of the Petition of:

PUGET SOUND ENERGY, INC.

For an Order Temporarily Suspending SQI
Nos. 6 and 8 due to the Business
Discontinuance of the SQI Survey Vendor

Docket Nos. UE-072300 and UG-072301
(consolidated)

PETITION FOR TEMPORARY
SUSPENSION OF SERVICE QUALITY
INDICES NOS. 6 AND 8

I. INTRODUCTION

1. In accordance with WAC 480-07-370(b), Puget Sound Energy, Inc. ("PSE") respectfully petitions the Commission for an order authorizing PSE to temporarily suspend Service Quality Indices ("SQI") Nos. 6 and 8, Telephone Center Transactions Customer Satisfaction and Field Service Operations Transactions Customer Satisfaction, respectively, during the 2013 SQI program year due to the business discontinuance of the SQI survey vendor as described in this petition ("Petition").

2. PSE is engaged in the business of providing electric and gas service within the State of Washington as a public service company, and is subject to the regulatory authority of the Commission as to its retail rates, service, facilities and practices. Its full name and mailing address are:

Puget Sound Energy, Inc.
Attn: Ken Johnson
Director – State Regulatory Affairs
P.O. Box 97034
Bellevue, Washington 98009-9734

3. Rules and statutes that may be brought at issue in this Petition include RCW 80.01.040, RCW 80.28.020, and WAC 480-07-370(b).

II. BACKGROUND

4. PSE first implemented its Service Quality Program (the "Program") in 1997 pursuant to Docket Nos. UE-951270 and UE-960195, the dockets approving the merger of Washington Natural Gas Company and Puget Sound Power & Light Company. The stated purpose of the Program was to "provide a specific mechanism to assure customers that they will not experience deterioration in quality of service"¹ and to "protect customers of PSE from poorly-targeted cost cutting"² as a result of the merger.

5. In the Commission's Order 12 in Docket Nos. UE-072300 and UG-072301 ("Order 12"), the Commission approved and adopted a set of five unopposed settlement stipulations filed by the parties in that general rate proceeding. In addition to setting forth the electric and natural gas rates that PSE's customers would be paying after November 1, 2008, Order 12 also authorized the continuation of the Program with certain revisions and new terms and conditions.

6. The Program currently includes three components: a Customer Service Guarantee, a Restoration Service Guarantee, and a set of nine service quality indices that require the Company to meet benchmarks in customer satisfaction, customer services, and operations services. Since 1997, PSE has continued the Program with temporary and permanent changes authorized by the Commission that would enable PSE to provide better service to its customers.

7. Since the inception of PSE's Program, Gilmore Research Group ("Gilmore") has been specifically named as the exclusive survey company to conduct and prepare the survey results for the Service Quality Program's SQI Nos. 6 and 8, Telephone Center Transactions Customer Satisfaction and Field Service Operations Transactions Customer Satisfaction,

¹ Dockets UE-951270 & UG-960195, Fourteenth Supplemental Order Accepting Stipulation; Approving Merger (February 5, 1997) (Stipulation at 11:14-15).

² Id. (Order at 32:3-6).

respectively.8. Gilmore's exclusivity was designated in the initial Service Quality Program mechanics document and has continued in all succeeding updates. Attachment A to this Petition includes the relevant pages from the currently effective Service Quality Program mechanics document, Appendix 2 to Exhibit J to the Settlement Agreement in Docket Nos. UE-011570 and UG-011571 (consolidated) ("Appendix 2"), as updated by Order 20 in Docket Nos. UE-072300 and UG-072301.

9. As described more fully below, PSE requests an order authorizing amendments to SQI Nos. 6 and 8 related to Gilmore's exclusivity. The following table summarizes the indices and their associated benchmark and calculation pertaining to this Petition.

Index	Benchmark	Performance Calculation
SQI No. 6-Customer Access Center Transaction Satisfaction	90% satisfied (rating of 5 or higher on a 7-point scale)	Access Center Telephone Transactions Customer Satisfaction = Monthly Average Of Percent Of Satisfied Customers
SQI No. 8- Field Service Operations Transactions Customer Satisfaction	90% satisfied (rating of 5 or higher on a 7-point scale)	Field Service Operations Transactions Customer Satisfaction = Monthly Average Of Satisfied Customers

III. GILMORE RESEARCH GROUP AND SQI SURVEYS

10. The performance data for SQI Nos. 6 and 8 are based upon the two survey questions prescribed in notes 6.f and 8.f of Appendix 2. The actual question for purposes of SQI No. 6 is, "Overall, how would you rate your satisfaction with this call to Puget Sound Energy - would you say 7- completely satisfied, 1- not at all satisfied, or some number in between?" The actual question for purposes of SQI No. 8 is, "Thinking about the entire service, from the time you first made the call until the work was completed, how would you rate your satisfaction with Puget Sound Energy - would you say 7- completely satisfied, 1- not at all satisfied, or some number in between?"

11. Gilmore fielded such surveys on a weekly basis in order to prepare the monthly reports that culminated into semi-annual and annual reports. Each week, Gilmore contacted 70 randomly selected customers who had called PSE's Customer Access Center in that week and 50 randomly selected customers who had requested PSE field service in that week. In all, Gilmore conducted 280 Customer Access Center interviews and 200 Customer Field Service interviews, respectively, per month.

12. The survey methodology and procedures used by Gilmore ("Procedures", attached hereto as Attachment B) were agreed to by PSE, Commission Staff, the Public Counsel Section of the Washington State Attorney General's Office, and the International Brotherhood of Electrical Workers³ in the Supplemental Stipulation in Docket Nos. UE-951270 and UE-960195 (consolidated) (attached hereto as Attachment C). An independent third-party, also agreed to by the four parties, certified that the methodology and procedures are designed to result in survey results that are unbiased and representative of the Company's customers and transactions at issue in each survey (a copy of such certification is attached hereto as Attachment D)

13. On February 11, 2013, PSE received a notice from the Gilmore Research Group that Gilmore was discontinuing its business operations. Gilmore informed PSE that it would be unable to conduct any more surveys for PSE and might not be able to finish the reporting of the February data it had already collected. Subsequent communications from Gilmore after February 11, 2013, confirmed Gilmore's lack of resource in finishing the February surveys of SQI Nos. 6 and 8 and carrying out any works in the future.

14. As the result of Gilmore's business discontinuance, as it is the designated exclusive performance data provider for SQI Nos. 6 and 8, PSE will not have the February

³ Collective, these four parties make up the signatories to the Supplemental Stipulation in Docket Nos. UE-951270 and UE-960195 (consolidated), approved by Commission order on July 31, 2007.

performance data for the two indices. Further, the availability of data after February will be subject to the outcome of this Petition and whether PSE and the interested parties can reach an agreement that meets the Commission order requirements in a timely fashion.

IV. REQUESTED ACTION

15. For the reasons set forth above, PSE respectfully requests that the Commission issue an order that:

- (1) Waives the designation in Appendix 2 to Exhibit J to the Settlement Agreement in Docket Nos. UE-011570 and UG-011571 of Gilmore Research Group as the sole data provider of SQI Nos. 6 and 8 so that PSE can retain another marketing research company to temporarily or permanently resume the survey work for the two indices; and
- (2) Suspends temporarily SQI Nos. 6 and 8 on a monthly basis⁴ during the 2013 SQI year until the methodology and procedures used by the new SQI survey service provider have been reviewed and agreed to by parties of the Service Quality Program settlement agreements.

DATED: March 11, 2013.

PUGET SOUND ENERGY, INC.

By 

Ken Johnson
Director - State Regulatory Affairs

⁴ With an expedited RFP process and prompt review of the newly selected surveyor by the parties, PSE hopes that the surveys can resume in May 2013.