



Puget Sound Energy, Inc.
P.O. Box 90868
Bellevue, WA 98009-0868

September 23, 2005

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Ms. Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Attn: Alan Rathbun, Pipeline Safety Director

RE: Information on PSE Customer Disconnect Process for Compliance-Related Activities

Dear Mr. Rathbun:

The purpose of this letter is to follow-up on discussions with Pipeline Safety Staff regarding Puget Sound Energy's (PSE) process for disconnecting customers when PSE representatives are unable to gain access to our facilities on the customer's property for compliance-related activities. As this process may result in the customer filing a complaint to the WUTC Consumer Affairs Division, PSE wants to ensure Staff is familiar with our processes and communications to proactively answer any questions Staff may have.

When special access arrangements must be made with the customer in order for PSE to perform required inspections and/or maintenance on our facilities, PSE makes every effort to contact the customer by phone and by mail to gain access to our facilities at a mutually acceptable time. When these attempts are unsuccessful, PSE may be required to disconnect gas service in order to remain in compliance with state and federal pipeline safety regulations.

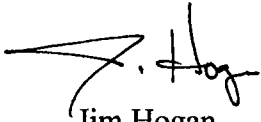
Disconnection of service in these situations is provided for in WAC 480-90-128 "Disconnection of Service", subsection (3) (d). This subsection allows a utility to disconnect service after properly notifying the customer when the customer has refused to allow the utility access to the customer's premises in accordance with WAC 480-90-168 "Access to premises; identification". Subsection (6) of WAC 480-90-128 specifies the required notifications to the customer prior to disconnection of service.

Attached are copies of sample letters that PSE plans to use to ensure that the notification requirements of WAC 480-90-128 are met. These sample letters contain information specific to customers with inside meter sets, however similar information would be provided for other facilities where PSE must make special access arrangements with the customer in order to complete inspection and maintenance activities.

RMS
TA

Please feel free to contact me at 425-462-3957 if you have any further questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Hogan". The signature is stylized with a large, sweeping initial "J" and a cursive "Hogan".

Jim Hogan
Manager, Standards and Compliance

Attachments

cc: Sue McLain
Booga Gilbertson
Duane Henderson
Kimberly Harris
Karl Karzmar
Janet Gaines
Grant Ringel
Molly Bork

{Date}
CERTIFIED MAIL

SECOND NOTICE

{Customer Name}
{Mailing Address}
{Mailing City}, {Mailing State}, {Mailing Zip Code}

RE: Inside Meter Survey
Meter Number **{Meter Number}**

Dear **{Customer Name}**,

IMPORTANT NOTICE: PSE will be required to turn off gas service to the address below on (Date) because we have not been able to gain access to our equipment there to perform a safety inspection required by state and federal law.

Puget Sound Energy (PSE) has made several attempts to contact you and to gain access to your property located at **{Service Address}, {Service City}** to perform this required safety inspection.

The gas service line and meter set in question is owned and operated by PSE. The Washington Administrative Code (WAC) Washington Utilities and Transportation Commission (WUTC) regulations states that all PSE property installed on a customer's premises is placed there under the customer's protection. In addition, WAC 480-90-168 establishes that PSE has the right to access customer's According to that rule (WAC 480-90-168), it is the responsibility of the customer to allow PSE access to your property for important functions such as meter reading, maintenance, repairs, testing, installation, or removal of the our equipment. A copy of the rule is included with this letter.

Please contact PSE at 1-888-225-5773, extension 81-4667 prior to **{Mailing Date + 8 Business Days}** to arrange for this inspection and avoid the discontinuance of your gas service.

We request that you allow our Service Technician access in order to inspect the gas service, meter, and any related parts of PSE's gas equipment. If you are the property owner and would prefer not to have inside inspections, PSE will assess the option of moving the meter set to the exterior of the building. Please be aware, however, that there are many different conditions that affect this decision, so it may not be possible to relocate your meter. Also, the cost of any relocation would be your responsibility.

PSE wishes to work with you to make mutually agreeable arrangements to perform this inspection. If you have any questions of PSE regarding this compliance program, you may contact a Supervisor at 1-888-225-5773, extension 89-6787.

Thank you for your cooperation,

GAS OPERATIONS

{Date}

CERTIFIED MAIL

THIRD AND FINAL NOTICE

{Customer Name}

{Mailing Address}

{Mailing City}, {Mailing State}, {Mailing Zip Code}

**RE: Inside Meter Survey
Meter Number {Meter Number}**

Dear {Customer Name},

Puget Sound Energy (PSE) has made several attempts to contact you and to gain access to your property located at {Service Address}, {Service City}. The gas service line and meter set in question is owned and operated by PSE. As outlined in our tariff on file with the ~~Washington Utilities and Transportation Commission (WUTC)~~ the Washington Administrative Code (WAC), all property of PSE installed on or upon the customer's premises is placed there under the customer's protection. According to WAC 480-90-168, it is the responsibility of the customer to grant a properly identified representative from PSE access to your property for functions such as meter reading, maintenance, repairs, testing, installation, or removal of the utility's property.

This is final notice that your gas service will be discontinued on {Mailing Date + 3 business days} because of your failure to provide utility representatives' access to the premises to perform inspections which are required by federal and state regulations. Please contact PSE at 1-888-225-5773, extension 81-4667, immediately to arrange for access and to avoid the discontinuance of your gas service.

Thank you for your cooperation

GAS OPERATIONS

{Date}

CERTIFIED MAIL

{Customer Name}

{Mailing Address}

{Mailing City}, {Mailing State}, {Mailing Zip Code}

RE: Inside Meter Survey
Meter Number **{Meter Number}**

Dear **{Customer Name}**,

On **{Inspection Date}**, a Puget Sound Energy (PSE) Service Technician attempted to gain access to your property located at **{Service Address}, {Service City}**, to perform a required safety inspection of the gas service line and meter(s). Our Technician was unable to perform the inspection because **{CGI reason}**

The gas service line and meter set in question is owned and operated by PSE. The Washington Administrative Code (WAC) requires-states that all PSE property installed on a customer's premises is placed there under the customer's protection. In addition, According to that rule (WAC 480-90-168), WAC 480-90-168 establishes that it is the responsibility of the customer to allow PSE has the right to access to your customer's property for important functions such as meter reading, maintenance, repairs, testing, installation, or removal of the-our equipment. A copy of the rule is included with this letter.

We request that you allow our Service Technician access in order to inspect the gas service, meter, and any related parts of PSE's gas equipment. If you are the property owner and would prefer not to have inside inspections, PSE will assess the option of moving the meter set to the exterior of the building. Please be aware, however, that there are many different conditions that affect this decision, so it may not be possible to relocate your meter. Also, the cost of any relocation would be your responsibility.

Inspections of indoor meter installations are required by federal and state regulations. PSE wishes to work with you to make mutually agreeable arrangements to perform this inspection. Please contact PSE at 1-888-225-5773, extension 81-4667 prior to **{Date of Letter + 14 days}** to arrange access for this inspection and, if desired, for an assessment of relocating the meter.

If you have any questions of PSE regarding this compliance program, you may contact a Supervisor at 1-888-225-5773, extension 89-6787.

Thank you for your cooperation.

GAS OPERATIONS

WAC 480-90-168 Access to premises; identification. (1) Authorized representatives of a gas utility have the right to enter a customer's property during reasonable hours to perform necessary functions such as meter reading, maintenance, repairs, testing, installation, or removal of the utility's property. Utilities must provide photo identification to utility representatives who are authorized to enter customers' premises. Customers have the right to see the utility-provided identification of gas utility representatives before allowing entry to the customer's property.

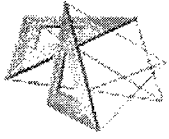
(2) When performing maintenance, repairs, testing, installation, or removal of the utility's property, the utility must restore the customer's property as close as reasonably practicable to the condition prior to the utility's action, unless otherwise defined in the utility's tariff or through a separate agreement with the customer.

[Statutory Authority: RCW 80.01.040 and 80.04.160. 01-11-003 (Docket No. UG-990294, General Order No. R-484), § 480-90-168, filed 5/3/01, effective 6/3/01.]

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Alan Rathbun/WUTC
Sent by: ALan Rathbun
10/14/2005 03:20 PM

To Jim.Hogan@pse.com
cc Tim Sweeney/WUTC@WUTC
bcc
Subject Your Correspondence of 9/23/05 - Customer Disconnect Process

Dear Jim:

Thank you for sharing the notices you plan on using for customer disconnect. We have talked with our consumer affairs folks about this process. They strongly recommend that the notice be clear and brief.

Tim Sweeney has reviewed the notices and believes you can reduce confusion and increase response by making it sound less legal and stating why its in the customer's best interest to respond quickly. His comments are listed below. Feel free to contact Tim directly if you have any questions. Thanks again for sharing this planned communication with us.

Alan E. Rathbun
Pipeline Safety Director

For instance: Instead of saying:

RE: Inside Meter Survey
Meter Number

which means very little to the customer, it could say something like:

RE: Ensuring the safe operation of your gas service.

The second notice should read something like

RE: Notice of Gas Service Disconnection for Failure to Provide Access

Third one could escalate it more by saying:

RE: Your Gas Service will be Disconnected on this DATE

These are suggestions drummed up quickly to give you an idea of how the subject line could be used more effective.

The body of the letter is unnecessarily legalistic. The second paragraph should state plainly that:

PSE needs to access your property for maintenance, repairs, and testing. If our technicians are not allowed to perform this inspection, we cannot be assured of your safety and we may have to disconnect your natural gas service.

We do not recommend citing specific WACs because it interferes with conveying your message.

However providing the WACs, in an attachment is appropriate. Rather than cite WACs, simply state that: the gas equipment is the property of PSE and that the customer, as a condition of receiving natural gas service, has an obligation to provide reasonable access to that equipment.

There should be a section with a subhead that says something like
What you can do to ensure continued natural gas service.
and under that subhead should be the contact information.

This letter should be no more than one page.

Tim

>>>><<<<<

Tim Sweeney
360-664-1118

Washington UTC Pipeline Safety Program

To sign up for Pipeline News updates:

<http://listserv.wa.gov/cgi-bin/wa?SUBED1=utc-pipeline-info&A=1>