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December 5, 2013

Via Web Portal and Overnight Mail

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

**Re: Docket Nos. UE-072300 and UG-072301 (consolidated)
Petition for One-Time Modification of SQI No. 5 Performance Calculation**

Dear Mr. King:

Enclosed please find an original and 12 copies of Puget Sound Energy, Inc.'s ("PSE" or "the Company") Petition for One-time Modification of Service Quality Index ("SQI") No. 5 Performance Calculation ("Petition"). PSE's Petition requests an order authorizing the Company to modify, one-time only, the calculation of SQI No. 5- Customer Access Center Answering Performance for the 2013 SQI performance year due to the impact of implementation of PSE's new customer information system ("CIS").

The SQI No. 5 annual benchmark of 75 percent is intended for the evaluation of PSE's Customer Access Center call answering performance absent any significant events that would interfere with its day-to-day operations for an extended period of time. However, the implementation of the new CIS significantly affected PSE's SQI No. 5 performance during the CIS transition and post implementation stabilization period, April through September 2013. During such period, call volumes were 10 percent higher than normal and the average call handling time more than doubled. As explained in the Petition, in order to accurately measure PSE's overall 2013 SQI No. 5 performance against the 75 percent benchmark, the April through September 2013 call answering results should be excluded from the 2013 performance calculation. The months that reflect PSE's performance under typical business conditions are the months prior to the CIS implementation (January-March) and the months after the CIS stabilization (October-December).

PSE had anticipated and prepared itself for the negative effects of its CIS implementation for months prior to implementation. In its March 13, 2013 petition to the Commission, PSE outlined some of these potential effects and presented its detailed mitigation plans that were designed to lessen negative customer impact. PSE's preparation and mitigation plans demonstrate that the Company implemented a well thought-out plan, and the ultimate impact on SQI No. 5 did not represent a deterioration in quality of service. Nor was it a result of poorly-targeted cost cutting.

Mr. Steven King
Page 2
December 5, 2013

Even with these preparations, PSE's SQI No. 5 performance during April through September 2013 was nevertheless significantly affected by the CIS implementation. PSE respectfully requests that the Commission issue an order regarding PSE's Petition no later than February 14, 2014, thereby allowing the one-time SQI No. 5 performance calculation to be reflected in the 2013 SQI performance year.

If you have any questions regarding the information in this filing, please contact Mei Cass at (425) 465-3800. If you have any other questions, please contact me at (425) 456-2110.

Sincerely,



Ken Johnson
Director, State Regulatory Affairs

Enclosure

cc: Sheree Carson, Perkins Coie
Service List for Docket Nos. UE-072300 and UG-072301