

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of:

PUGET SOUND ENERGY, INC.
For Mitigation of Service Quality Index No.
5 Penalty for Period Ending December 31,
2013.

DOCKETS UE-072300 and
UG-072301 (*consolidated*)

REPLY OF COMMISSION STAFF
IN SUPPORT OF PETITION FOR
MITIGATION

1 On March 28, Puget Sound Energy, Inc. (“PSE”) submitted a petition requesting mitigation of Service Quality Index (“SQI”) No. 5 – Customer Access Center Answering Performance penalties for failing to meet the benchmark requirements. The performance standard for SQI 5 is an annual benchmark of 75 percent of calls answered by a live representative within 30 seconds of request to speak to a live operator. PSE achieved a result of 66 percent in 2013 due to the implementation of a new Customer Information System (“CIS”). This resulted in an automatic penalty assessment of \$648,000 absent mitigation.

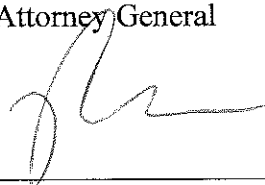
2 Under the Service Quality Program, mitigation is available to PSE if a penalty is due to “unusual or exceptional circumstances for which PSE’s level of preparedness and response was reasonable.” PSE’s petition explains in detail the unusual and exceptional circumstances and PSE’s preparation and mitigation actions to lessen the adverse effects of the new CIS implementation. Staff is satisfied that PSE has met its burden to warrant

mitigation of the full penalty. Therefore, Staff supports PSE's petition and recommends the petition be granted by the Commission.

DATED this 16th day of April 2014.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General



ROBERT D. CEDARBAUM
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff