

**EXHIBIT NO. ___(ZDJ-5)
DOCKET NOS. UE-111048/UG-111049
2011 PSE GENERAL RATE CASE
WITNESS: ZANA D. JONES**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

**Docket No. UE-111048
Docket No. UG-111049**

**FOURTH EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED REBUTTAL TESTIMONY OF
ZANA D. JONES
ON BEHALF OF PUGET SOUND ENERGY, INC.**

JANUARY 17, 2012

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED:	December 21, 2011	WITNESS:	Roger Kouchi
DOCKETS:	UE-111048/UG-111049	RESPONDER:	Roger Kouchi
REQUESTER:	Puget Sound Energy	TELEPHONE:	(360) 664-1101

PSE Data Request No. 031 to WUTC Staff:

RE: Roger Kouchi, Exhibit No. ___(RK-1T), page 15, lines 2-3.

Please describe and provide all documents, data, calculations, and analyses in support of Mr. Kouchi's opinion that "it is reasonable for the Company to identify all gas and electric stopped meters and unassigned usage meter problems within two months."

RESPONSE:

Mr. Kouchi's testimony is based on his judgment in light of three factors: (1) PSE installed the AMR meters in pertinent part to provide increased efficiencies, reduction in estimated billing issues and increased read accuracy; (2) PSE has the obligation and duty to maintain and assure accurate meters and meter reading; and (3) Customers have the reasonable expectation that their bills are accurate. Customers should not bear this risk or suffer unreasonably high back-bills when PSE has this responsibility. Staff believes that the recommended timeframe to identify and resolve 100 percent of all electric meter and billing issues within four months and 100 percent of all gas meter and billing issues within six months is a reasonable expectation.