

**Exhibit No. \_\_\_ (SW-7)**  
**Docket U-110808**  
**Witness: Sharon Wallace**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**V.**

**PUGET SOUND ENERGY, INC.,**

**Respondent.**

**DOCKET U-110808**

**EXHIBIT TO  
REBUTTAL TESTIMONY OF**

**Sharon Wallace**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*Excerpt from Attachment A to PSE's response to  
Public Counsel Data Request No. 016,  
dated May 13, 2011*

---

**From:** Hobbs, Michael G  
**Sent:** Friday, May 13, 2011 2:29 PM  
**To:** DeBoer, Tom; Archuleta, Gilbert; Dieterle, Randy; Barard, Agnes  
**Cc:** Jackson, Aundrea  
**Subject:** RE: FOR REVIEW: Prior Obligation Updates - UTC Order and Quarterly Report  
**Importance:** High

Gilbert:

First off, I agree with Tom's guidance about combining the two documents into one complete document. However, I also believe there is a lot more needed to make this a Quarterly Report document.

First, the report is disjointed and does not follow a logical format. It should start out with referencing the UTC Docket Number on the cover page and begin with a summary of the UTC findings, followed by the order deliverable requirements. The Order required two specific referenced items by response from PSE; (2) requiring investigation of twenty-six specific accounts, (3) requiring continued plan implementation, as described in the Company's PowerPoint presentation {Need to review the PowerPoint presentation and list any other deliverable agreements we made - like quarterly reporting of QA results} That sets the stage for understanding what the problem was and what the expectations were of PSE from the Order. Then follow-up with the actions taken by PSE to address each of the identified items and to become compliant.

Secondly, the current *Introduction* section is confusing and repetitive with regard to the WAC Rules and definition. A more definitive format would be along the lines of "WAC 48-90-123(2) applies to gas companies, and WAC 480-100-123(3) applies to electric companies concerning prior obligation rules. The prior obligation rules state: An gas (electric) utility may not refuse to provide..." This eliminates the duplicative language in the current Introduction write-up.

For any tables we are reporting the quarterly results for Prior Obligation, should we not be using the UTC template format requested by Suzanne Stillwell on October 05, 2010? The UTC requested use of templates in a similar format for all reporting of prior obligation, and one for LIHEAP and company program statistics.

Be careful of your dates. On Page 4, Total Population of Prior Obligation you reference a date of March 31, 1011.

Under Audit Results, you reference that "... a total of 10% of all disconnection calls will be randomly selected and audited." Yet, we did not select 10% for audit purposes and we did not explain the reason why. The diagrams on Pages 5 and 6 are very difficult to read. You many want to make them a page on their own for ease of reading. Likewise, on these flow charts at the top, you reference "Internal Quality Assurance process, Internal Quality Control process, and External Quality Assurance Process." Note the difference in letter case on each "process" word. On Page 5, the box on the right labeled "Internal QA" is really a QC process. A Quality Assurance process follows a Quality Control process. Your "Internal QA" listed on Page 6 is the QA of the Page 5 QC.

On Page 7 under "Current Period Scores" we show "Current Month." However, we do not identify what the current month is.

On Page 8, the header is "Analysis of trends/Observations (again letter cases), we do not provide valid reasons for the lack of 100% compliance YTD or what we are implementing to as far as corrective actions. We only state what we are doing in "Areas of Focus" effective April 24. I would have thought that we would have identified any trends sooner and taken corrective action prior to April 24.

On Page 8, in the "Future Actions Planned by PSE" section, we state; "The Quality Assurance team has identified trends and analyzed mistakes in handling Credit Disconnect calls." I don't believe this statement is correct. If you look at your flow chart on Page 6, this task appears to align with the "Internal QC" box. I think you need to be clear on what is a QC function and task and what is a QA function and task.

On the Prior Obligation Order Update, we must report on all 26 accounts in the same format as you reported the "Audit Sample - 5 of 26 from 12/10/2010 Review. That is what the Order requires.

Michael Hobbs  
Director Operations Programs  
Puget Sound Energy  
Office Direct (425) 456-2702  
E-Mail: michael.hobbs@pse.com

---

**From:** DeBoer, Tom  
**Sent:** Friday, May 13, 2011 11:33 AM  
**To:** Archuleta, Gilbert; Dieterle, Randy; Barard, Agnes  
**Cc:** Jackson, Aundrea; Hobbs, Michael G  
**Subject:** RE: FOR REVIEW: Prior Obligation Updates - UTC Order and Quarterly Report

Much of what is needed is in these two documents but it doesn't tell a concise and coherent story in its current configuration. I would combine both documents into a single Quarterly Report document (in Word) rather than 2 pieces. I would take the Table starting on page 3 of the PowerPoint and make it a Word table listing as "Activity" all of the bullet points exactly as they are listed on page 3 of the December 10 PowerPoint. The second column then could address each of these points - status and future actions.

The investigation into the 26 accounts should be in a separate document since it will need to be filed separately. It should also be configured as a table in a Word document. Also the "analysis" and "action required" sections are a bit cryptic. I would fully describe each in a complete and descriptive narrative. In the current form, most are difficult to follow.

---

**From:** Archuleta, Gilbert  
**Sent:** Tuesday, May 10, 2011 4:06 PM  
**To:** DeBoer, Tom; Hobbs, Michael G  
**Cc:** Jackson, Aundrea; Barard, Agnes  
**Subject:** FOR REVIEW: Prior Obligation Updates - UTC Order and Quarterly Report

Tom and Mike: