



Bob Ferguson  
**ATTORNEY GENERAL OF WASHINGTON**

800 Fifth Avenue #2000 • Seattle WA 98104-3188

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Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P. O. Box 47250  
Olympia, Washington 98504-7250

Re: Puget Sound Energy. Introduces Schedule 171 - Optional Non-Communicating Meter Service, to provide electric and gas service residential customers an "opt-out" of advanced metering infrastructure,  
Dockets UE-180860 and UG-180861

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office (Public Counsel) respectfully submits these comments in advance of the January 10, 2019, Open Meeting. These comments are in response to Puget Sound Energy's (PSE) filing of Schedule 171 providing an optional Opt Out Program for electric and natural gas advanced metering infrastructure (Opt Out Program). We appreciate the opportunity to comment on this filing.

***Public Counsel's Recommendation***

Public Counsel recommends the Commission approve the filings with amendments.

**I. GENERAL COMMENTS**

The Company originally filed its tariff on October 17, 2018, and filed a revision on January 4, 2019. Given the Company's revisions to the filing, Public Counsel is generally supportive of the filing and believes the Company is consistent with the Commission's Policy Statement.<sup>1</sup> However, we have three amendments to the Company's filing, which we believe the Commission should consider.

<sup>1</sup> *In the Matter of the Commission Inquiry into Customer Choice for Advanced Meter Installation*, Docket U-180117, Policy and Interpretive Statement on Customer Choice for Advanced Meter Installation (Apr. 10, 2018).



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### A. Amendments Public Counsel Supports

Public Counsel supports the following three revisions to the filing made by PSE in its January 4<sup>th</sup> revised filing.

First, the Company, in its replacement pages filed on January 4, 2019, proposes semi-annual reporting on Schedule 171, which includes expenditures of the programs, revenues associated with the schedule, and participation rates.<sup>2</sup> Public Counsel supports the Company's reporting plan. It is our understanding that the Company's Opt Out Program will require a fair amount of additional expenses for billing and attaining meter readings for participants. Public Counsel continues to have concerns regarding the socialization of the costs associated with the program. However, we believe the semi-annual reporting will allow transparency in understanding the true effects and costs of the program on non-participating customers.

Second, in the Company's original filing, the Company proposed a one-time fee of \$170 for electric non-communicating meters<sup>3</sup> and \$70 for natural gas non-communicating meter.<sup>4</sup> In its updated filing, the Company amended the one-time fees for electric and natural gas to \$90<sup>5</sup> and \$50,<sup>6</sup> respectively. Public Counsel supports PSE's decision to lower the costs of the one-time fee and believes it is consistent with the fees assessed in Avista Corporation's Opt Out Pilot.

Finally, PSE proposed a \$25 inaccessible meter charge in instances where the Company is unable to gain access to a participant's meter for bi-monthly reading.<sup>7</sup> This charge has been removed in the substitute filings.<sup>8</sup> Public Counsel believed this fee was unreasonable, and supports the Company's decision to remove the charge from the filing.

### B. Public Counsel's Recommendations

Public Counsel proposes three amendments to PSE's Schedule 171 filing.

First, Public Counsel believes the Company should offer a 30-day grace period, in which the one-time fee is waived for customers who had an AMI meter installed after the initial 60 day notification period has expired. Avista Corporation's AMI Opt Out Pilot filed in Dockets UE-

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<sup>2</sup> Dockets UE-180860 & UG-180861, Puget Sound Energy Electric and Natural Gas Schedules 171 Proposed Reporting Plan, Exhibit A (Jan. 4, 2019).

<sup>3</sup> Docket UE-180860, Advice Letter at 5 (Oct. 17, 2018).

<sup>4</sup> Docket UG-180860, Advice Letter at 5 (Oct. 17, 2018).

<sup>5</sup> Docket UE-180860, Substitute Advice Letter at 2 (Jan. 4, 2019).

<sup>6</sup> Docket UG-180861, Substitute Advice Letter at 2 (Jan. 4, 2019).

<sup>7</sup> Docket UE-180860, Advice Letter at 5 (Oct. 17, 2018); Docket UG-180861, Advice Letter at 5 (Oct. 17, 2018).

<sup>8</sup> Docket UE-180860, Substitute Advice Letter at 1 (Jan. 4, 2019); Docket UG-180861, Substitute Advice Letter at 1 (Jan. 4, 2019).

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180418 and UG-180419 provides a 90-day window, in which customers can opt out at no cost, whereas PSE proposes only a 60-day window. We believe this 90-day policy, which the Commission approved,<sup>9</sup> is a reasonable policy that all utilities deploying AMI should offer to their customers. Public Counsel recommends the Commission include this condition in the Company's filing.

Second, the Company has proposed to revoke or refuse the installation of a non-communicating meter if the following instance occurs: "current or past incidents of service disconnection for non-payment (of Customer's electric and/or natural gas accounts for communicating and/or non-communicating meters) twice within the prior 12-month period."<sup>10</sup> Public Counsel believes this condition will hamper the ability of some customers, particularly low-income customers, to participate in the program. Furthermore, the Company has not provided any details as to why this is an appropriate condition for revoking or refusing installation of a non-communicating meter. Thus, Public Counsel recommends the Commission remove this condition.

Finally, the Company originally proposed to allow, "A Customer receiving bill assistance benefits under Schedule 129, Low Income Program, may use such benefits to pay for charges under this Schedule".<sup>11</sup> Moreover, in the replacement pages filed on January 4, 2019, the Company has added the following language to the tariff, "For Schedule 171 Customers who are receiving Schedule 129 benefits, the Company will increase the benefit amount for the applicable Schedule 171 charges for the remaining months of the current Schedule 129 program year." While Public Counsel agrees with the Company's decision to allow the recurring fees of the program to be covered by a participant's bill assistance benefit (if they qualify), the Company has not provided any information explaining the amount (or calculation) of additional bill assistance that a Schedule 171 participant may receive. For example, will the increase to a participant's bill assistance benefit cover a portion or all of the recurring fee? Additionally, the Company has not explained where this additional increase to the bill assistance funds will originate. Public Counsel would like to ensure that low-income customers are unhindered from participating in Schedule 171. As a result, we recommend the Company be required to provide details for the increased bill assistance customers may receive if participating in Schedule 171 and where the funds will originate.

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<sup>9</sup> *In the Matter of the Revision to Tariff WN U-28 and WN U-29 of Avista Corp. d/b/a Avista Utils. for Proposed New Tariff Revisions, Electric Schedule 80, and Natural Gas Schedule 180, AMI Non-Communicating Meter*, Dockets UE-180418 & UG-180419, Final Order 01, Allowing Tariff Revisions to Go Into Effect Subject to Condition (Jul. 30, 2018).

<sup>10</sup> Dockets UE-180860 & UG-180861, Schedule 171 substitute tariff sheets, Sections 2(8)(d) (Jan. 4, 2019).

<sup>11</sup> Dockets UE-180860 & UG-180861, Advice Letter at 4 (Oct. 17, 2018).

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**II. CONCLUSION**

Public Counsel believes the Company's filing is consistent with the Commission's Policy statement on consumer choice. We recommend that the Commission approve the filing with the amendments mentioned above. Public Counsel will be at the Open Meeting on January 10, 2018. If you have any questions about this filing, please contact me at (206) 389-3040 or via e-mail at [CarlaC@ATG.WA.GOV](mailto:CarlaC@ATG.WA.GOV).

Sincerely,



CARLA A. COLAMONICI  
Regulatory Analyst  
Public Counsel Unit  
(206) 389-3040

cc: Simon ffitch (via E-mail only)