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March 29, 2019

Filed Via Web Portal

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket U-180525: Response to Information Request from Puget Sound Energy on Commission Rulemaking to Modify Existing Consumer Protection and Meter Rules to Include Advanced Metering Infrastructure

Dear Mr. Johnson:

Puget Sound Energy (“PSE” or the “Company”) appreciates the opportunity to respond to the request for additional information and submits the following comments in response to the request in the Washington Utilities and Transportation Commission’s (“Commission”) Notice of Request for Additional Information issued in Docket U-180525 (“Notice”) on March 18, 2019.

Request No. 1:

Investor-owned electric utilities operating in this state have implemented or researched processes and procedures for ensuring that the company does not remotely disconnect certain customers and that it has authorized all remote disconnections of electric service. Please identify and describe those processes and procedures, including but not limited to how they are effective in preventing unauthorized remote disconnects.

PSE Response:

Puget Sound Energy is currently in the project planning phase for implementation of Remote Connect/Disconnect using our AMI meters, which includes review of existing internal processes and research into best practices or potential new rules. Currently, PSE has identified the following internal system checks that should be met before the company would initiate a remote disconnection command.

- That there is not an active “Life Support” flag in our customer information system. Customers requiring energy for ongoing health needs can renew this flag annually. PSE’s current practice flags customers with a “life support” designation so they are not

disconnected for any reason, and likewise will not be eligible to be remotely disconnected for any reason.

- That the customer has not filed for “Medical Emergency.” Medical Emergency is a temporary designation that exists today in PSE’s systems for customers recovering from a recent illness or injury. While that designation is in place, those customers generally will not be disconnected, unless an exception as specified in rule applies.

This designation could last longer, if premise visits are required for those customers who have had a medical emergency verified in the past 24 months, as contemplated in the UTC’s draft rules. Those customers who have had a verified medical emergency in the past 24 months could still be disconnected; however, the premise would be visited first rather than handled remotely.

Currently, if a customer has not filed for Medical Emergency and they do get disconnected, they can notify PSE of the medical emergency and immediately be reconnected. They will then have a ten day lock placed on their account, and five days to file the appropriate paperwork. This process should remain the same even when remote disconnection is available.

- That the customer has not received an Energy Assistance pledge in the past 24 months nor has the customer requested an appointment seeking Energy Assistance. Under current PSE practice, once the customer makes an appointment, PSE locks the account (preventing disconnection) until five days after their appointment date to allow time for the agency to make a pledge to their account. This practice is expected to continue even when remote disconnection is available. Additionally, in accordance with the UTC’s proposed rules, a premise visit would occur prior to disconnection for any customer who has received an Energy Assistance pledge in the past 24 months.
- PSE’s current practice is to perform manual disconnections between 8:00 a.m. and 4:00 p.m. on weekdays (excluding holidays). PSE is researching whether to constrain its system so that remote disconnections do not occur outside the hours of 8:00 a.m. – 12:00 p.m. Monday – Friday (excluding holidays), as described in the UTC’s proposed rules. Only manual disconnections will occur outside of these hours.
- That the daily maximum number of remote disconnections allowed has not been reached. PSE continues to research an appropriate maximum number of daily remote disconnects. Once the maximum number of remote disconnections has been reached, any remaining disconnections either would be done manually or take place the next business day during execution hours.

By putting these requirements in place, PSE is ensuring that individual customers under certain conditions cannot be remotely disconnected and will be able to communicate with PSE on their options. In addition, the time restrictions and daily maximums provide a safeguard against a system failure or other technology situation that might generate disconnection orders incorrectly.

Finally, upon implementation PSE plans to do manual reviews of remote disconnections before they are released in order to gather data and validate that all processes are working as planned.

Request No. 2:

Other states have addressed how to require or otherwise establish the extent to which data collected from smart meters is sufficiently aggregated to permit usage and disclosure of that data without revealing customer-specific information. Please identify those states and describe the methodologies, definitions, regulations, or requirements each state has adopted.

PSE Response:

PSE has researched other states' definition of aggregate data in various contexts and believes the definition PSE suggested in its previously filed comments in this docket presents an appropriate balance, as it is more restrictive than most definitions of aggregate data found in other state-level privacy laws and more flexible than other state-level definitions of aggregate data by public utility commissions. For example, most state and federal privacy laws define aggregate data as data without direct identifiers, and many of them also allow for the sharing of individual-level information so long as direct identifiers have been removed.

PSE prefers the approach taken in the proposed rules in defining "aggregate data," with one change, indicated in bold text below:

"Aggregate data" means any personally identifiable information from which all identifying information has been removed or modified so that the personal information is rendered unreadable, unusable, or undecipherable by an authorized person and cannot **reasonably** be attributed to any individual customer.

PSE appreciates the opportunity to provide responses to the requests outlined in the Commission's Notice of Request for Additional Information. Please contact Kara Durbin (425) 456-2377 or Nate Hill at (425) 457-5524 for additional information about these comments. If you have any other questions please contact me at (425) 456-2142.

Sincerely,

/s/ Jon Piliaris

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