BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket UE-220701
Puget Sound Energy
Coyote Creek Homeowners v. Puget Sound Energy

COYOTE CREEK HOMEOWNERS DATA REQUEST NO. 004:

Please provide all program codes, formulas, mathematical rules, and scripts (if/when Applicable) generating "Meter Read Summary" (all its columns) that PSE uses for Billing purposes.

Response:

Puget Sound Energy ("PSE") objects to Coyote Creek Homeowners ("CCH") Data Request No. 004 as overbroad unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. PSE further objects to the extent that the phrases "all program codes, formulas, mathematical rules, and scripts," "Meter Read Summary" and "all its columns" are vague and ambiguous. Without waiving these objections and subject thereto, please see PSE's Response to CCH Data Request No. 005 for detailed descriptions of the process from meter reads to SAP. Attachments A and B to PSE's Responses to CCH Data Request No. 005 show the data in PSE's Meter Data Management System and in PSE's SAP billing and invoice module.

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Date of Response: 12/05/2022
Person who Prepared the Response: Allison Sains and Mei Cass
Witness Knowledgeable About the Response: Stacey Halsen