



# PREPROPOSAL STATEMENT OF INQUIRY

**CR-101 (October 2017)  
(Implements RCW 34.05.310)**

Do **NOT** use for expedited rule making

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STATE OF WASHINGTON  
FILED

DATE: July 10, 2018

TIME: 8:37 AM

WSR 18-15-019

**Agency:** Washington Utilities and Transportation Commission

**Subject of possible rule making:** This inquiry will consider whether investor-owned utility deployment of Advanced Metering Infrastructure (AMI) technologies requires modification of existing rules in WAC 480-100 (Electric Companies) and WAC 480-90 (Gas Companies) related to consumer protection and meters. This inquiry addresses key concerns expressed by regulated companies, Commission staff, and utility stakeholders regarding data privacy; remote disconnection functionality; customer deposits and prepaid services; billing requirements; customer notification; and meter testing, identification, and accuracy requirements. This rulemaking has been assigned Docket U-180525.)

**Statutes authorizing the agency to adopt rules on this subject:** RCW 80.01.040 and RCW 80.04.160

**Reasons why rules on this subject may be needed and what they might accomplish:** As required by the public service laws, the Commission regulates investor-owned electric and natural gas companies to ensure that the rates, services, facilities, and practices of those companies are consistent with the public interest. AMI technologies present unique challenges to existing consumer protection rules. For example, the volume and type of data available to utilities raises concerns that the existing rules may not adequately define the level of data aggregation and security measures necessary to protect customers' individual usage data and personal information. The technology also provides the capability for utilities to disconnect electric customers remotely without a field staff visit to the customer premises, which may require alternative and additional consumer protections. Additionally, these technologies afford a variety of other billing and payment practice changes, such as utility service pre-payment, which may require a modification to existing rules to ensure an appropriate balance of benefits and risks between the utilities and their customers.

**Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies:** N/A

**Process for developing new rule (check all that apply):**

- Negotiated rule making
- Pilot rule making
- Agency study

Other (describe) The Commission is issuing a Notice of Opportunity to comment concurrently with the CR-101 filing and plans to host a stakeholder workshop in November 2018. The Commission may also conduct other processes to gather the information necessary to determine which rules require modification.

**Interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication by contacting:**

Name: Executive Director and Secretary, Washington Utilities and Transportation Commission	(If necessary) Name:
Address: P.O. Box 47250 or 1300 S. Evergreen Park Drive S.W. Olympia, Washington 98504-7250	Address:
Phone: (360) 664-1174	Phone:
Fax: (360) 586-1150	Fax:
TTY:	TTY:
Email: records@utc.wa.gov	Email:
Web site: www.utc.wa.gov/e-filing	Web site:

Other: Deadline for interested persons to file comments with Other:  
the Commission is September 7, 2018 by 5:00 p.m.

Additional comments: For specific information regarding opportunities for written comments and to ensure receipt of further information concerning this rulemaking, please see the attachment to this form.

**Date:** July 10, 2018

**Name:** Mark L. Johnson

**Title:** Executive Director and Secretary

**Signature:**

A handwritten signature in black ink, appearing to read "Mark L. Johnson", written in a cursive style.