



Puget Sound Energy  
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***Filed Via Web Portal***

Mr. Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**Re: Advice No. 2020-27  
PSE's Natural Gas Tariff Revision - Filed Electronically**

Dear Mr. Johnson:

Pursuant to RCW 80.28.060 and WAC 480-80-101 and WAC 480-80-105(1)(c), please find enclosed for filing the following proposed revision to the WN U-2, Tariff for natural gas service of Puget Sound Energy ("PSE" or "the Company"):

**5<sup>th</sup> Revision of Sheet No. 39-A: Rule No. 25 Meter Testing Procedures (Continued)  
Original Sheet No. 39-B: Rule No. 25 Meter Testing Procedures (Continued)**

The purpose of this tariff revision is to provide a one-time exception regarding the annual requirement of the statistical performance evaluation of all the meter families prescribed in PSE's Rule No. 25, because of the COVID-19 Pandemic related restrictions<sup>1</sup> and in order to preserve the health of PSE's first responders and avoid risking the health of Customers. PSE expects to restart its Rule No. 25 meter Performance Control Program when all counties in PSE's natural gas service area are in the Phase 4 of Washington State's Safe Start Plan<sup>2</sup> along with consideration of avoiding the heating season to minimize customer impact.

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<sup>1</sup>Proclamations by Washington State Governor Inslee: 20-05, 20-25, 20-25.1, 20-25.2, 20-25.3, and 20-25.4  
<https://www.governor.wa.gov/sites/default/files/20-25.4%20-%20COVID-19%20Safe%20Start.pdf>

<sup>2</sup> Phase 4 would mean a return to normal activity. Proclamation 20-25.4 Transition from "STAY HOME – STAY HEALTHY" to "SAFE START – STAY HEALTHY" county-by-county phased reopening  
<https://www.governor.wa.gov/sites/default/files/SafeStartPhasedReopening.pdf>

Rule No. 25, section 3, Performance Control Program and Meter Changeout, subsection 3, states that:

3. Each meter family in the performance control program is subject to a statistical performance evaluation using a random sample of the family. The evaluations are conducted annually in accordance with ANSI B109.1 and B109.2. A meter family is considered to be acceptable if the family sample indicates (a) a minimum proportion of .80 of the family measures between 98.0% and 102.0% accurate (an “accuracy” requirement), and (b) a minimum proportion of .90 of the family measures no more than 102.0% accurate (a “not fast” requirement.) Based on the annual performance evaluation, each meter family determined to be acceptable is allowed to remain in service, subject to sample testing and review in succeeding years.

The proposed change to Rule No. 25 is a new tariff rule section (*i.e.*, subsection 5 of section 3, Performance Control Program and Meter Changeout, in the proposed new tariff Sheet No. 39-B) for the one-time exception, as follows:

5. COVID-19 Pandemic Exception: The Company shall suspend its annual meter evaluations changeout under subsection 3 of this section until all counties in the Company’s Gas Service area are in the phase 4 of the Washington State phased reopening per the Washington State’s 2020 Safe Start Plan (“Phase 4”). Any meter changeouts for testing under the section 4 of this section will be scheduled starting in the first non-heating-season after all counties are in Phase 4.

A meter changeout for the statistical performance evaluation per Rule No. 25 is a non-emergency task and is not considered as essential work during the current on-going COVID-19 Pandemic. Moreover, a natural gas meter changeout requires PSE field personnel (typically a PSE natural gas first responder) to enter customer residences or businesses to properly reactivate gas service and safely relight equipment after a changeout. This type of changeout does not align PSE work activities with Washington State’s COVID-19 Pandemic related mandates<sup>3</sup>. That is, PSE has been temporarily postponing work requiring entry into customer homes and businesses with the exception of emergency or make-safe or activities that are deemed essential under the state’s Safe Start Plan. This work priority change has been, at first, delayed and, then, prevented the gas meter changeouts for PSE’s Rule No. 25 meter Performance Control Program. Given the current COVID-19 Pandemic related mandates and the upcoming heating season of September 2020 to March 2021, PSE has no chance of collecting the minimum total sample size of 2,495 meters needed per the ANSI<sup>4</sup> guidelines, which the Rule No. 25 Performance Control Program follows.

All the meter families in the Performance Control Program have historically exceeded testing requirements. Testing protocols require that within each family at least 80% of tested meters

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<sup>3</sup> See Footnote 1

<sup>4</sup> ANSI B109.1 and B109.2. Per WAC 480-90-343, Statement of meter test procedures, subsection (iv) Reference to an industry standard such as ANSI C12.1 or ANSI/[isrt]ASQC-Z1.9 that will establish acceptable criteria for numerical analysis.

<https://apps.leg.wa.gov/wac/default.aspx?cite=480-90-343>

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have an accuracy within +/- 2%. The performance of the sample population over the previous three years has been a “pass” rate of 93% (2019), 95% (2018) and 93% (2017). As such, immediate risks of any gas meter families failing are deemed low for 2020. PSE finds the risk is low for any impacts to metering, revenue and billing accuracy. Therefore, PSE proposes the above mentioned tariff rule change to suspend the Performance Control Program related to annual meter changeouts:

- To reduce the risk of transmission of COVID-19 among or between natural gas first responders, who conduct critical and first response activities that are highly linked to employee and customer safety, and
- To reduce the risk of transmission of COVID-19 from PSE employees to customers, or *vice-versa*.

The changeout of electric meters for performance control, which requires no work inside of customer premises, is on track for full completion in 2020.

These proposed changes do not have any effect on any customer requests meter test under Rule No. 8 Metering, which will be accommodated according to Rule No. 8.

The tariff sheets described herein reflect an issue date of September 15, 2020, and effective date of October 16, 2020. Posting of proposed tariff changes, as required by law and the Commission’s rules and regulations, is being completed through web, telephone and mail access in accordance with WAC 480-90-193.

Please contact Mei Cass at (425) 462-3800 or [mei.cass@pse.com](mailto:mei.cass@pse.com) for information about this filing. If you have any other questions, please contact me at (425) 456-2142.

Sincerely,

*/s/ Jon A. Piliaris*

Jon A. Piliaris - Director, Regulatory Affairs

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cc: Lisa Gafken, Public Counsel  
Sheree Carson, Perkins Coie

Attachment:

Natural Gas Tariff Sheets (listed above)