

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

ALEXANDER AND ELENA ARGUNOV,  
THOMAS AND HEIDI JOHNSON,  
CHAD AND VICTORIA GROESBECK

Complainants,

v.

PUGET SOUND ENERGY

Respondent.

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DOCKET UE-220701

**CROSS EXAMINATION EXHIBIT OF STACEY B. HALSEN  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT SBH-\_\_X**

Puget Sound Energy's Response to Public Counsel Data Request No. 37

**March 8, 2023**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

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

**Public Counsel Data Requests Nos. 35 through 37 to Puget Sound Energy**

To: PUGET SOUND ENERGY (PSE or the Company)

**PC-35 RE: Advanced Metering Infrastructure.**

In a tabular format, please list separately the number of new Advanced Metering Infrastructure (AMI) meter installations for new customers, the number of meter replacements by meter type for existing customers, and the number of manual meter reads conducted by PSE field technicians throughout its service territory for each month between December 2018 and December 2022.

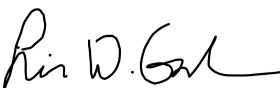
**PC-36 RE: Cross-Answering Testimony of Stacey Halsen, Exh. SBH-7T.**

The cross-answering testimony of Stacey Halsen states that COVID-19 protocols prevented timely replacement of Argunovs' and Groesbecks' Automatic Meter Reading (AMR) meters. Please answer the following questions regarding the referenced COVID-19 protocols:

- a. What specific external (i.e., federal agency, state agency) COVID-19 guidance was PSE following that prevented timely replacement of Argunovs' and Groesbecks' AMR meters?
- b. What specific internal COVID-19 protocols did PSE put in place that prevented timely replacement of Argunovs' and Groesbecks' AMR meters?
- c. During what time frame did PSE follow COVID-protocols that stopped all "non-critical field work"?
- d. Please list all activities that were considered "non-critical field work" under PSE's internal COVID-19 protocols.
- e. Please list all activities that were considered critical field work under PSE's internal COVID-19 protocols.

**PC-37 RE: Response Testimony of Stacey Halsen, Exh. SBH-1T at 22:16–17.**

In the response testimony of Stacey Halsen, Halsen states that "PSE strives to comply with the WAC regarding meter testing and estimation of bills. PSE has taken steps to avoid similar delays in the future." Please describe with particularity the steps PSE has taken to avoid similar delays in the future.

/s/ 

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**THIS SERVES AS A PLACEHOLDER DOCUMENT FOR PUGET  
SOUND ENERGY'S RESPONSE TO PUBLIC COUNSEL'S  
DATA REQUEST NO. 37 WHICH IS STILL PENDING**