

Puget Sound Energy

Meter and Billing Performance Annual Report

Annual Reporting Period:

January 1, 2021 - December 31, 2021

Filed on January 31, 2022

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Introduction

This is Puget Sound Energy's ("PSE") ninth Meter and Billing Performance Annual Report under the revised Meter and Billing Performance Standards set forth in the Partial Settlement in Order 8 of consolidated Dockets. UE-111048 and UG-111049 ("Partial Settlement") for the period of January 1, 2021 through December 31, 2021. With one exception, PSE met all standards for the identification and the correction of the stopped meters and the meters with unassigned energy usage.

The meter and billing performance standards per Partial Settlement paragraph 13 ("Meter and Billing Performance Standards" or "Meter and Billing Standards") are:

- PSE will identify and correct 98 percent of all stopped meter and unassigned energy usage meter problems for both natural gas and electric meters within 12 months from initial occurrence of the problem.
- PSE will identify and correct all stopped meter and unassigned energy problems for both natural gas and electric meters within 24 months from the initial problems report.

This report also discusses the results of the on-going zero Consumption 180-day customer notification requirement (per Partial Settlement paragraph 18).

The layout and elements of this report are consistent with the draft annual meter and billing report outline reviewed and discussed with the Commission Staff on September 27, 2013. Staff provided additional comments and suggestions via an e-mail on October 30, 2013, which have been incorporated in this report.



Summary Progress to Date

Meter and Billing Performance Summary

For the 2021 annual reporting period, PSE is in full compliance with the 12-month threshold for stopped meter problems and with the 12-month threshold for all unassigned energy usage ("UEU") meter cases. PSE is out of compliance with 1 stopped meter case, or 0.04%, for the 24-month threshold and the explanation is provided in the Issues Discussion section of this report located on page 10.

One of the key factors affecting PSE's 2021 meter and billing performance is the Commission-revised billing requirements and payment date rules that became effective on March 25, 2016. WAC 480-90-178¹ and 480-100-178² (the "Rules"), for the natural gas and electric utilities respectively, set forth more rigorous and detailed meter and billing correction requirements than that of PSE's Meter and Billing Performance Standards. In particular, the subsection (a) of section (5) Corrected bills of the Rules prescribes the following:

The utility must issue the corrected bill within sixty days from the date the utility discovered that an account had been under billed or overbilled. Except as provided in subsection (7) of this section, when a utility's investigation finds that it has under billed energy usage, it may not collect under billed amounts for any period greater than six months from the date the error occurred.

In 2016, PSE revised its meter and billing operation and monitoring processes in order to meet the requirements of the enhanced state Rules. In most cases, the Rules allow sixty days to investigate and correct a metering/billing issue and limit the billing correction to be no longer than six months. Both the sixty-day and six-month thresholds are much shorter than the 12-month and 24-month thresholds in PSE's Meter and Billing Performance Standards.

² http://apps.leg.wa.gov/wac/default.aspx?cite=480-100-178

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¹ http://apps.leg.wa.gov/wac/default.aspx?cite=480-90-178

Resolution Results for Stopped Meters

The table below provides the total number of stopped meters that had been identified and correctly back-billed between January 1, 2021, and December 31, 2021. The time measure is based on the starting date of the billing adjustment (*i.e.*, the date when the commodity was accurately measured) to the end date of the billing adjustment (*i.e.*, the date that the customer's meter again accurately records usage) as prescribed in the paragraph 14 of the Partial Settlement.

	Within 6 Months	Within 12 Months	Within 24 Months	Above 24 Months	Total Meters	Within 12 Months	Within 24 Months	Exceeds 24 Months	Total Results
Electric	299	108	0	0	407	100.00%	100.00%	0.00%	100.00%
Natural	1,218	680	4	1	1,903	99.74%	99.95%	0.05%	100.00%
Gas									
Total	1,517	788	4	1	2,310	99.78%	99.96%	0.04%	100.00%

Resolution Results for Unassigned Energy Usage

The table below provides the total number of meters with Unassigned Energy Usage that had been identified and correctly billed between January 1, 2021, and December 31, 2021. The time measure is based on the date the customer moved in to the location (*i.e.*, the date of the customer's initial unauthorized usage to the last billing-cycle date the adjustment (*i.e.*, the date that the back-bill was issued).

	Within	Within	Within	Above	Total	Within	Within	Exceeds	Total
	6	12	24	24	Meters	12	24	24	Results
	Months	Months	Months	Months		Months	Months	Months	
Electric	3,314	12	0	0	3,326	100.00%	100.00%	0.00%	100.00%
Natural	4,154	48	0	0	4,202	100.00%	100.00%	0.00%	100.00%
Gas									
Total	7,468	60	0	0	7,528	100.00%	100.00%	0.00%	100.00%



Zero Consumption 180-Day Customer Notification Report

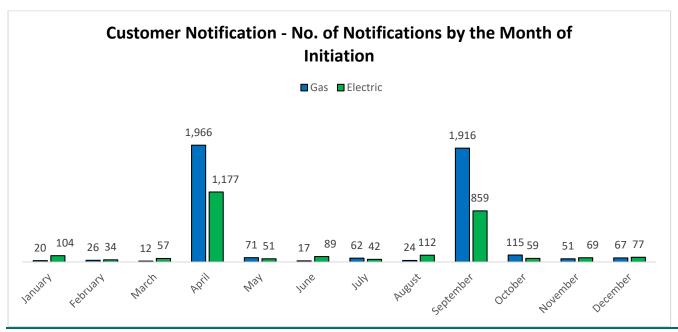
As part of the PSE's Partial Settlement commitments, PSE has carried out an on-going process to notify each customer with a meter showing zero consumption for 180 consecutive days. This section of the report summarizes the results of the customer notification process for the period of January 1, 2021, through December 31, 2021.

In the current customer notification process, started on October 1, 2014, a letter is sent to a customer whenever the 180-day zero consumption threshold is met. An example of the customer notification letter is included for reference in Appendix B: Zero Consumption 180-Day Customer Notice.

In 2021, PSE sent out 7,077 zero consumption 180-day notification letters; 2,730 electric cases and 4,347 natural gas cases. 7,074 of the 7,077 cases are customer confirmed valid zero usage cases and 1 resolved case required a billing adjustment. Two cases are pending a resolution.

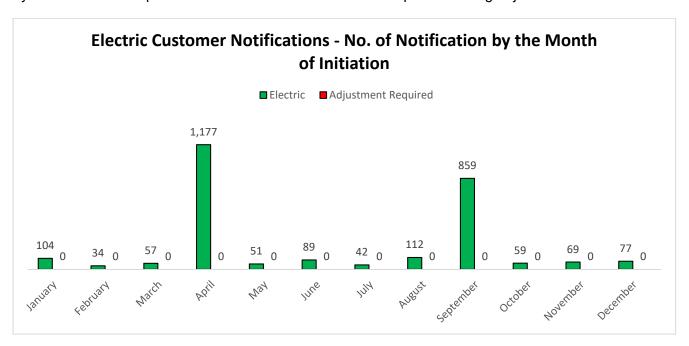
	Contact Cases Initiated	Confirmed Zero- usage Cases	Resolved Cases with Billing Adjustments	On Going Cases
Electric	2,730	2,730	0	0
Natural Gas	4,347	4,344	1	2
Total	7,077	7,074	1	2

The chart below shows the breakdown of customer notifications generated by fuel and by month:

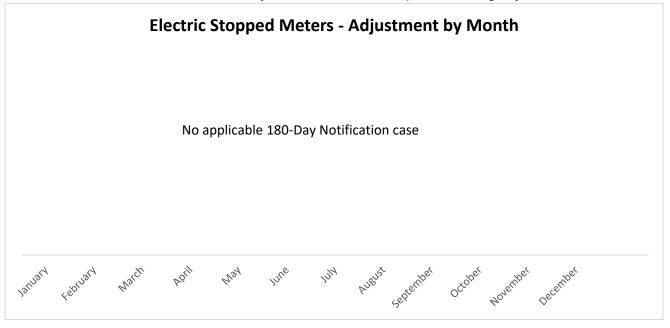


During the 2021 annual reporting period, 2,730 electric notification cases were resolved. There were no pending cases nor any cases that required billing adjustments.

The chart below shows the resolution status of the 2021 electric 180-day zero consumption notification cases by the month of completion. None of these electric cases required a billing adjustment.

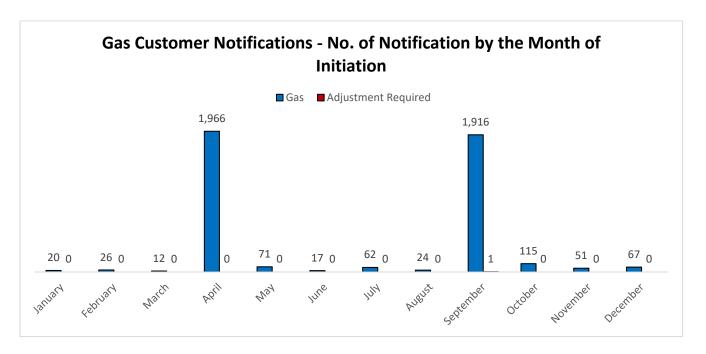


The chart for the length of back-bill and the back-bill dollar amount for the resolved electric is shown as blank as none of the revolved electric 180-Day notification cases required a billing adjustment.

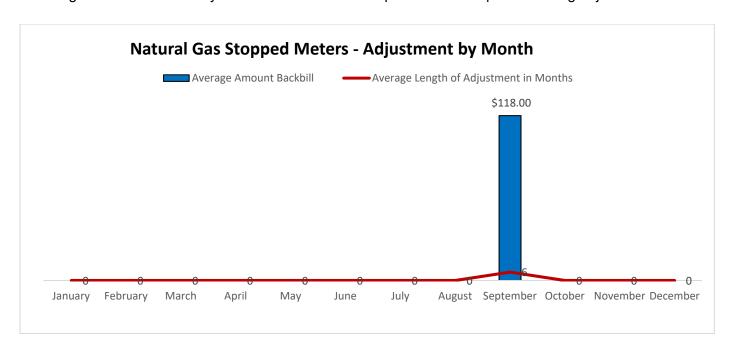


For the natural gas notification cases, 4,345 out of 4,347 were resolved during the 2021 reporting period. Two cases are pending a resolution. 4,344 of the completed cases are customer-confirmed zero-usage meters. One case of the 4,345 resolved natural gas cases required a billing adjustment.

The chart below shows the resolution status of the 2021 natural gas 180-day zero consumption notification cases by the month of completion.



The chart below shows the average length of back-bill and the average back-bill dollar amount for the two natural gas cases identified by the customer notification process that required a billing adjustment.





Tracking and Reporting of Meter/Billing Issues

Issues Discussion

In May 2021, one stopped meter case was processed that exceeded the 24-month threshold. The correction resulted in an overall credit to the customer in the amount of \$84.49. Although the correction exceeded the 24-month threshold for this report, it did fall in line with the WAC rule which allows corrections up to six years that result in a credit to the customer. This case required a gas meter replacement which was delayed due to the on-going COVID-19 pandemic and PSE's safety protocols.

Process Improvement

There were no processes implemented specifically during the 2021 reporting period to address cases that were corrected outside the Standards.



Appendix A: Background, Definitions, and Standards

Background

This meter and billing performance annual reporting is designed to meet the terms and requirements of the Partial Settlement RE: Meter and Billing Performance Standards ("Partial Settlement") in consolidated Docket Nos. UE-111048 and UG-111049 Order 08 ("Order 08") dated May 7, 2012. The layout and elements of this report are consistent with the draft annual meter and billing report outline reviewed and discussed with the Commission Staff on September 27, 2013. Staff provided additional comments and suggestions via an e-mail on October 30, 2013, which have been incorporated in the report. The annual report is due no later than January 31 for the preceding calendar year.

The Partial Settlement dictates both the meter and billing performance standards and reporting requirements for the quarterly reporting periods 2012 Q2 through 2013 Q2 and the annual reporting periods starting 2013. The quarterly performance standards were included 2012 Q2 through 2013 Q2 reports. The on-going annual Meter and Billing Performance Standards per Partial Settlement paragraph 13 are outlined in the Meter and Billing Performance Standards section of this appendix.

For the meter cases that are corrected outside of the Meter and Billing Performance Standards, PSE will retain the following information for these cases:

- <u>Stopped meters</u>: the last date when the commodity was accurately billed, the date the customer's meter again accurately records usage and the date PSE issues the back-bill.
- <u>Unassigned energy usage meters</u>: the date of the customer's initial unauthorized usage and the date that PSE issues the back-bill.

In addition, there are two meter and billing processes that PSE committed to in the Partial Settlement to carry out after June 1, 2012.

- 1. A one-time investigation process to identify and correct, if needed, meters with zero consumption for 365 consecutive days.
- 2. An on-going process to notify each customer with a meter that showing zero consumption for 180 consecutive days.

The results of the one-time investigation process were included in the *One Time Zero Consumption 365-Day Investigation Completion Report – Final Report* section of PSE's first annual reporting filed with the Commission on January 31, 2014.

The results of the one-going process were included in the following section of this report: *Zero Consumption 180-Day Investigation Report.*

PSE_2021_Performance_Standard_Report_Meter_Billing_1-11-2021_FINAL DRAFT.docx

Definitions

For purposes of the Meter and Billing Performance Standards time measurement will be as follows:

- <u>Stopped meters</u>: The performance standard for stopped meters will be measured from the last date commodity was accurately measured (the "initial occurrence" for stopped meters) to the date the customer's meter again accurately records usage.
- <u>Unassigned energy usage meters</u>: The performance standard for meters with unassigned energy usage will be measured from the date of the customer's initial unauthorized usage (the "initial occurrence" for unassigned energy usage) to the date the back-bill was issued.

Meter and Billing Performance Standards

Effective starting June 1, 2013, and continuing until changed, the two Meter and Billing Performance Standards ("Meter and Billing Performance Standards") are:

- 1. PSE will identify and correct 98 percent of all stopped meter and unassigned energy usage meter problems for both natural gas and electric meters within 12 months from initial occurrence of the problem.
- 2. PSE will identify and correct all stopped meter and unassigned energy problems for both natural gas and electric meters within 24 months from the initial problem.



Appendix B: Zero Consumption 180- Day Investigation Customer Notice

Customer Notice

The following is an example of the customer notice PSE is sending to any customer with a meter that did not register any usage for 180 consecutive days.

