

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

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

Complainants,

v.

PUGET SOUND ENERGY

Respondent.

DOCKET UE-220701

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

EXHIBIT SBH-__X

Puget Sound Energy's Response to Public Counsel Data Request No. 36

March 8, 2023

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-220701
Puget Sound Energy
Argunov, et al. v. Puget Sound Energy**

PUBLIC COUNSEL DATA REQUEST NO. 036:

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.

Response:

- a. Governor Inslee's Proclamation 20.25 "Stay Home – Stay Healthy" in which the Governor ordered that all people in Washington State cease leaving their home or place of residence except: (1) to conduct or participate in essential activities, and/or (2) for employment in essential business services. This Proclamation included an appendix in which the Governor designated a list of "Essential Critical Infrastructure Workers" for the Energy Industry / Essential workforce – Electricity industry which is shown in the snapshot below. This list can be found on page 5 of Proclamation 20.25 Appendix.

Essential Workforce - Electricity industry:

- Workers who maintain, ensure, or restore the generation, transmission, and distribution of electric power, including call centers, utility workers, reliability engineers and fleet maintenance technicians
 - Workers needed for hydroelectric, biofuels, biogas, geothermal energy, wind, biomass, solar and coal energy generation.
 - Workers who maintain emergency management, risk management, safety and security, and business continuity at all energy generation, transmission, distribution, delivery, production, processing or refining facilities that provide critical community services to Washington state.
 - Workers needed for safe and secure operations at nuclear generation
 - Workers at generation, transmission, and electric blackstart facilities
 - Workers at Reliability Coordinator (RC), Balancing Authorities (BA), and primary and backup Control Centers (CC), including but not limited to independent system operators, regional transmission organizations, and balancing authorities
 - Mutual assistance personnel
 - IT and OT technology staff – for Energy Management System and Supervisory Control and Data Acquisition (SCADA) systems, and utility data centers; Cybersecurity engineers; cybersecurity risk management
 - Vegetation management crews and traffic workers who support
 - Environmental remediation/monitoring technicians
 - Instrumentation, protection, and control technicians
- b. The Argunovs' and Groesbecks' AMR meters were replaced with AMI meters ahead of schedule. To comply with the Governor's Proclamation and list of Essential Workforce for the Electric industry referenced in above response, Puget Sound Energy ("PSE") ceased working investigations of non-communicating AMR meters as this work was not performed by "Critical Infrastructure Workers". Additionally, if PSE employees contracted or were in contact with someone who had COVID, they were prohibited from performing work that might bring them in contact with customers or other PSE employees for a certain period of time. This resulted in additional backlog.
- c. The time frame began on March 23, 2020 and lasted through May 31, 2020, which is the date the Governor's "Stay Home – Stay Healthy" order ended allowing non-essential work to begin again on June 1, 2020.
- d. PSE objects to Public Counsel Data Request No. 036(d) on the grounds that it is vague, ambiguous, overbroad and unduly burdensome to the extent it requests "all" activities. Without waiving the objection and subject thereto, PSE responds as follows. Activities considered non-critical field work were field work activities not included in the Governor's designated list of "Essential Critical Infrastructure Workers" for the Energy Industry.

- e. PSE objects to Public Counsel Data Request No. 036(e) on the grounds that it is vague, ambiguous, overbroad and unduly burdensome to the extent it requests “all” activities. Without waiving the objection and subject thereto, PSE responds as follows. Activities considered critical fieldwork were fieldwork activities included in the Governor’s designated list of “Essential Critical Infrastructure Workers” for the Energy Industry.