

**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. 23

**March 8, 2023**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**Public Counsel Request No. 023:**

The formal Complaint states that PSE received no meter readings between November 23, 2020, and August 18, 2021, in the complaint case CAS-33073- L9B0MB. The formal Complaint states that PSE estimated bills for this time period.

- a. Why did PSE take nine months to establish a new AMI meter when no readings were taken?
- b. What is PSE's response procedure when PSE receives no meter readings for a customer?
- c. How are bills and electricity usage estimated when PSE receives no actual electricity consumption readings through meters?
- i. How are bill charges corrected later on once consumption readings are restored?
- d. What is PSE's response procedure when PSE notices that a customer has an abnormally high amount of electricity consumption compared to historical electricity consumption data?
- e. When does PSE use bill estimates instead of actual electricity consumption to provide bill invoices to customers?
- f. Does PSE communicate to the customer when a bill is estimated without actual electricity consumption readings from meters?
- i. If yes, through what communication mode and how frequently does PSE communicate this to affected customers? Please provide copies of such communications.

**Response:**

- a. Puget Sound Energy's ("PSE") billing system will automatically generate an Enhanced Message Management ("EMMA") case when it detects an exception to the normal billing process or a situation where a billing correction may be necessary. An EMMA case is used to help define, track, and manage billing-related errors. On 3/15/21, the first EMMA case was generated in the system, and was worked by a Billing Performance agent on 4/21/21. PSE's Billing Performance team strives to complete EMMA cases within 60 days from the creation date. The agent followed the business process by creating a service notification to obtain a meter read from the meter's register as it was not obvious that a meter exchange was necessary at this point. The service notification was sent to PSE's Meter Network Services ("MNS") department who completed the

service notification 37 days later on 5/28/21. MNS makes every attempt to complete this service notification type within 30 days, however, this timeframe can vary depending on weather, access, location, etc. Although an actual meter read was obtained in the field, this does not notify the Billing Performance team to follow up on the account. A second EMMA case was generated by the system on 5/13/21 due to continued estimated meter reads, however, this case did not get worked on until 8/6/21, which was beyond 60 days due to workload. At this time, it became clear the meter needed to be replaced and a service notification was created. The Electric Meter Operations team completed this service notification on 8/18/21.

- b. PSE's billing system, SAP, is designed to generate an EMMA case after the fourth consecutive estimated meter read. When the EMMA case is reviewed by an agent they determine whether a service notification is necessary or if a correction can be made at that time.
- c. Estimates are based on the standard SAP estimation algorithm, as per industry best practice. The estimation will use periodic consumption for the first month after installation, and past month consumption for any estimates thereafter. Once a full year of read data is available, SAP will start estimating based on data from previous years. To calculate periodic consumption, PSE averages all electric consumption from the same rate schedule that the customer is billed for. The customer's rate schedule is listed on their monthly billing statement.
  - i. The estimated meter reads are re-estimated between the actual reads PSE has received. The billing periods that are re-estimated are deemed in-line with consumption history (using standard SAP estimation).
- d. PSE has analytics in place at the meter read level, the bill level, and the invoice level that cause the bill to "outsort" if it is out of line with historical norms (i.e., it will set aside the bill for additional review). The system will then generate an EMMA case for review.
- e. PSE estimates bills when it is unable to receive an actual meter read.
- f. Yes; the bill codes the meter read on the statement as an "estimate."
  - i. Customers are informed through their bills, where the Electric Detail portion of the bill displays the Meter Read Type as 'Estimated Read.'