

**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. 37

Updated March 9, 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. 037:

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.

Response:

Additional staff has been hired to complete the backlog of “non-critical” work which accumulated between March 23, 2020 when the Governor’s Proclamation began and May 31, 2020 when the Governor’s Proclamation ended. This backlog has been reduced and Puget Sound Energy (“PSE”) is in compliance with the WACs pertaining to Meter Tests and Estimated Reads. Additionally, PSE is closer to the completion of upgrading all residential AMR meters to AMI meters, which will reduce the communication issues we have experienced with the obsolete AMR network. While AMR meters accurately read electrical usage, as they did for the Complainants, the network receiving those reads is not as reliable, particularly in harder to reach, remote areas like rural Cle Elum. With the upgrade to AMI Infrastructure across its service territory, PSE expects a reduction in estimated reads/estimated bills, which will result in less field work and less billing corrections. Notably, when the Argunovs and Groesbecks received an upgraded AMI meter ahead of schedule for their area, the network was considerably more reliable.