

**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. 35

**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. 035:**

**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.

**Response:**

Puget Sound Energy (“PSE”) objects to Public Counsel Data Request No. 035 on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections and subject thereto, PSE responds as follows:

**Number of Meter Replacements by Meter Type for Customers**

The below counts represent electric residential/commercial meter exchanges since January 1, 2018 captured in the Company’s meter data management system (“MDMS”) as of March 6, 2023. There is some over-counting for scenarios where a meter is uninstalled and re-installed for the same customer to complete billing and data corrections. PSE currently does not have a readily available way of identifying all of these instances.

| <b>METER_ACTIVITY</b> | <b>COUNT(*)</b> |
|-----------------------|-----------------|
| AMI to AMI            | 6,437           |
| AMI to AMR            | 421             |
| AMI to NCOM           | 243             |
| AMR to AMI            | 1,048,107       |
| AMR to AMR            | 38,809          |
| AMR to NCOM           | 1,634           |
| NCOM to AMI           | 228             |
| NCOM to AMR           | 1               |
| NCOM to NCOM          | 1               |

| METER_ACTIVITY      | COUNT(*) |
|---------------------|----------|
| New Customer to AMI | 31655    |

### Manual Reads Conducted by Field Technicians

Retrieving the manual reads conducted by field technicians requires a manual process to capture the data. This data spans multiple data tables within SAP. Isolating one month of data took over three hours to extract the data. Reporting on this data for PSE's entire service area, month over month for a four year period would take several weeks to complete and would be overly burdensome.

Below are the manual meter readings for January 2020, January 2021, January 2022, and January 2023 to provide a monthly comparison across each year. This specific data was reported out of PSE's SAP system.

The explanation of the read reasons in the tables below are:

- 1 (Periodic manual read for normal billing reads for Non-Communicating Meters)
- 3 (Final meter reading at move-in/out)
- 6 (Meter reading at move-in)
- 9 (Interim without billing) – these are reads obtained during service notifications where a meter investigation takes place
- 11 and 16 (Device modifications within the system and the reads are showing as manual even though they are actually not)
- 12 (Meter reading at technical removal, meter is removed no replacement)
- 25 (Replacement upon removal is when a meter is replaced once removed)

| January 2020                                  |             |              |
|---|-------------|--------------|
| Count of MT 52 Manual                         |             |              |
| Read Reason                                   | KWH         | Total        |
| 1 - Periodic Meter Reading                    | 7177        | 14017        |
| 3 - Final meter reading at move-in/out        | 13          | 19           |
| 6 - Meter reading at move-in                  | 3           | 6            |
| 9 - Interim Meter Reading Without Billing     | 3           | 6            |
| 11 - Meter reading after program./adjustment  | 2           | 4            |
| 12 - Meter reading at technical removal       | 2           | 6            |
| 16 - Meter reading before program./adjustment | 1           | 2            |
| 25 - Replacement upon removal                 | 5           | 5            |
| <b>Total</b>                                  | <b>7206</b> | <b>14065</b> |

| January 2021                                 |             |              |
|--|-------------|--------------|
| <b>Count of MT 52 Manual</b>                 |             |              |
| <b>Row Labels</b>                            | <b>KWH</b>  | <b>Total</b> |
| 1 - Periodic Meter Reading                   | 5046        | 12527        |
| 3 - Final meter reading at move-in/out       | 11          | 22           |
| 6 - Meter reading at move-in                 | 3           | 10           |
| 9 - Interim Meter Reading Without Billing    | 2           | 10           |
| 11 - Meter reading after program./adjustment | 1           | 13           |
| 12 - Meter reading at technical removal      | 3           | 3            |
| 25 - Replacement upon removal                | 1           | 2            |
| <b>Total</b>                                 | <b>5067</b> | <b>12587</b> |

| January 2022                                  |             |              |
|---|-------------|--------------|
| <b>Count of MT 52 Manual</b>                  |             |              |
| <b>Row Labels</b>                             | <b>KWH</b>  | <b>Total</b> |
| 1 - Periodic Meter Reading                    | 3085        | 10270        |
| 3 - Final meter reading at move-in/out        | 3           | 7            |
| 6 - Meter reading at move-in                  |             | 3            |
| 9 - Interim Meter Reading Without Billing     |             | 4            |
| 11 - Meter reading after program./adjustment  |             | 16           |
| 12 - Meter reading at technical removal       | 1           | 1            |
| 16 - Meter reading before program./adjustment |             | 1            |
| 25 - Replacement upon removal                 | 2           | 2            |
| <b>Total</b>                                  | <b>3091</b> | <b>10304</b> |

| January 2023                                  |             |              |
|---|-------------|--------------|
| <b>Count of MT 52 Manual</b>                  |             |              |
| <b>Row Labels</b>                             | <b>KWH</b>  | <b>Total</b> |
| 1 - Periodic Meter Reading                    | 3744        | 16125        |
| 3 - Final meter reading at move-in/out        | 6           | 17           |
| 6 - Meter reading at move-in                  | 2           | 2            |
| 9 - Interim Meter Reading Without Billing     | 2           | 17           |
| 11 - Meter reading after program./adjustment  |             | 2            |
| 16 - Meter reading before program./adjustment |             | 5            |
| <b>Total</b>                                  | <b>3754</b> | <b>16168</b> |