

January 10, 2020

**Filed Via Web Portal**Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503Re: **Docket U-180525: Comments of Puget Sound Energy as Follow-Up to the December 19 Advanced Metering Infrastructure (AMI) Workshop.**Received  
Records Management  
01/10/20 14:13  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Dear Mr. Johnson:

Puget Sound Energy (“PSE” or the “Company”) appreciates the opportunity to follow-up in writing on a few items requested by the Commission at the December 19 AMI Workshop.

**1. Definition of “customer”**

At the workshop, PSE suggested some possible revisions to the definition of “customer” to address the status of a customer when that customer has been disconnected and immediately wants to be reconnected, which are restated below:

“Customer” for the purposes of ~~these rules~~ this chapter may also include a person or other entity whose service has been involuntarily disconnected ~~if and that~~ and that person or entity then seeks to have the utility reconnect service.

**2. Definition of “customer information”**

PSE appreciates the Commission’s willingness to narrow the definition of “customer information” in the draft rules. As discussed at the workshop, PSE recommends narrowing the definition to focus on account information and/or a specific list of personal information that can reasonably identify a specific customer, property, or residence, such as a name, address, account number, and billing records. This should address many of the concerns PSE raised in its response to the Small Business Economic Impact Statement (SBEIS) Questionnaire on December 12, 2019.

**3. Medical certificate forms**

As indicated during the workshop, PSE has specific forms that it uses for customers who indicate they may be facing a medical emergency or needing life support. Those forms are provided as Attachment A.

**4. Time Frame for Responding to Customer Request for Account Information**

PSE is committed to making a reasonable effort to respond to all requests for account information in a timely manner. If the definition of “customer information” is revised to cover

only specific account or billing information, as discussed during the workshop, then PSE is reasonably comfortable it can respond to most requests within 10 business days. However, if the definition of “customer information” remains broad, then PSE requests more than 10 business days to respond to customer requests. As an example, the California Consumer Protection Act provides that customer requests must be responded to within 45 days.

## 5. Cyber Security Standards

PSE maintains a strong focus on cyber security. There are a variety of national and industry oriented cybersecurity and physical security risk assessment processes and frameworks. PSE pulls from multiple sources to ensure a more well-rounded view into the security activities needed to lower or mitigate risk. For more information on PSE’s approach to cyber security, please see our 2018 Critical Infrastructure Security Report.<sup>1</sup>

## 6. Other – Customer Consent

PSE would like to reiterate its interest in allowing customer consent to be secured verbally, if that consent can be recorded and transcribed to an electronic, written format. This could be accomplished by modifying the definition of written consent as follows:

“Written consent” means permissions or authorization that is documented in writing ~~in writing~~, whether electronically or in hard copy. Written consent may also include those instances in which consent is provided verbally, if verbal consent is captured through a recording and transcribed to a written format.

PSE appreciates the opportunity to provide follow-up comments in this proceeding. Please contact Kara Durbin at (425) 456-2377 for additional information about these comments. If you have any other questions please contact me at (425) 456-2142.

Sincerely,

*/s/ Jon Piliaris*

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cc: Lisa Gafken, Public Counsel  
Sheree Strom Carson, Perkins Coie

Attachment A: Medical Certificate Forms

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<sup>1</sup> See Attachment C, PSE 2018 Critical Infrastructure Security Annual Report, filed in Dockets UE-170033 and UG-170034 (consolidated) and Dockets UE-072300 and UG-072301 (consolidated).