

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION****Dockets UE-190529 & UG-190530  
Puget Sound Energy  
2019 General Rate Case****PUBLIC COUNSEL DATA REQUEST NO. 257:**

Please refer to Catherine A. Koch's Rebuttal Testimony, Exh. CAK-6T at 4:18, which references an "(i)nability to efficiently replace network equipment with like equipment as they have been discontinued, and the need to perform reprogramming of devices because different network equipment must be installed." Provide the cost PSE incurred reprogramming devices because of network equipment installed in the last full year before PSE began to install AMI meters. Provide all documentation and calculations used to develop your answer.

**Response:**

The last full year before Advanced Metering Infrastructure meter installation began was 2017. In that year, Puget Sound Energy ("PSE") replaced 139 Automated Meter Reading network devices which required reprogramming. PSE estimates the cost of reprogramming is \$139,000 assuming the unit reprogramming cost to be about \$1,000 per device, as determined through discussions with Landis + Gyr as these costs are embedded in unitized rates. Approximately 72 percent of PSE's network equipment is no longer manufactured, so in addition to reprogramming required on specific devices, additional surrounding network equipment must be replaced to communicate with available replacement devices for a specific area.