

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION****Dockets UE-190529 & UG-190530  
Puget Sound Energy  
2019 General Rate Case****PUBLIC COUNSEL DATA REQUEST NO. 261:**

Please refer to Catherine A. Koch's Rebuttal Testimony, Exh. CAK-6T at 5:21-23, which states "Mr. Alvarez also fails to acknowledge that, as noted in the AMI Business Case, page 19, because the AMR network is failing and deficient, it requires 50,000-60,000 meters to be manually read monthly . . . ." Confirm that the cost of reading 50,000-60,000 meters monthly is included in the \$230 million cost to continue the AMR system as estimated in Exh. CAK-04, Appendix A at 8. If this can be confirmed, please identify the cost and show where it is provided. If this cannot be confirmed, please explain.

**Response:**

As explained in Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 259, Mr. Alvarez misrepresents that \$230 million is the cost to continue the Automated Meter Reading ("AMR") system, which is incorrect. The \$230 million is the difference between the cost of maintaining PSE's legacy AMR system due to failure and growth and the cost of maintaining an Advanced Metering Infrastructure system due to failure and growth over the next 20 years. See the Prefiled Rebuttal Testimony of Catherine A. Koch, Exh. CAK-6T, at 18:17-23 to 19:1-7.

Manual meter reads are not accounted for in the benefit represented by the \$230 million. PSE would have paid the same to Landis+Gyr whether they provided an automated read or a manual read. Had PSE included a cost for manual reads, the cost of continuing with AMR would have been higher and as a result, the avoided AMR investment benefit would be greater.