

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case****PUBLIC COUNSEL DATA REQUEST NO. 267:**

Please refer to Catherine A. Koch's Rebuttal Testimony, Exh. CAK-6T at 10:18 to 11:2, which states:

(H)e [Mr. Alvarez] does not understand that replacing large groups of assets almost always results in overlapping book value simply due to the logistics. It would be unrealistic to expect a transition plan of this magnitude to be perfectly timed with full depreciation of this mass asset. This would require PSE to install the AMI system all in one day after the AMR mass asset is fully depreciated in order to maintain reliable metering for customers which is an unrealistic expectation.

- a) Please state whether PSE is aware of AMI meters designed to bridge the transition from AMR to AMI. Called "bridge" meters, these AMI meters are equipped to be read by legacy AMR methods (drive-by radio or fixed radio network). The AMI meters are installed only upon AMR meter failure, resulting in a gradual, low-cost transition to AMI over time.
- b) Regardless of whether the answer to subsection (a) above is answered in the affirmative, provide any analyses PSE completed of a "bridge" solution, in which AMI meters, readable through AMR methods, are installed gradually over time as AMR meters fail. If no analysis was conducted, please state so.

Response:

Puget Sound Energy ("PSE") provides the following in response to Public Counsel Data Request No. 267.

- a) PSE's current Automated Meter Reading ("AMR") system manufacturer, Landis + Gyr ("L+G"), does not have a device called a "bridge" meter or a similar device with that type of cross functionality that will work with PSE's current AMR network. As discussed in PSE's Response to Public Counsel Data Request No. 255, other manufacturer's communication modules and network topology are not compatible with PSE's existing AMR system.

- b) PSE has not performed an analysis of a solution that is not compatible with PSE's existing AMR system and network topology, as PSE would need to replace the L+G communication equipment and system, essentially performing the same transition as PSE is currently doing with Advanced Metering Infrastructure.