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***Filed Via Web Portal***

Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
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Olympia, Washington 98504-7250

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COMMISSION

Re: **Docket U-180525: Comments of Puget Sound Energy on Commission Rulemaking to Modify Existing Consumer Protection and Meter Rules to Include Advanced Metering Infrastructure.**

Dear Mr. Johnson:

Puget Sound Energy (“PSE” or the “Company”) appreciates the opportunity to respond to the questions proposed in this docket and submits the following comments in response to the request in the Washington Utilities and Transportation Commission’s (“Commission”) Notice of Opportunity to File Written Comments issued in Docket U-180525 (“Notice”).

PSE has recently begun to exchange its aging automated meter reading (“AMR”) electric meters and natural gas AMR modules for more advanced meters and modules. This advanced metering infrastructure (“AMI”) project mitigates the risk of aging AMR metering infrastructure and provides the foundation for PSE to pursue operational efficiency and enhanced customer service. AMI capabilities and benefits require the near full-deployment of advanced metering infrastructure. PSE responds to the Commission’s requests for information below and notes that it will continue to monitor the evolving legal framework for customer data and will evolve its practices to comply with applicable laws.

**Data Privacy**

- 1. What information pertaining to customers’ energy usage do companies currently collect, retain, or share with third parties?*
  - a. What incremental or different information will companies collect or retain with the implementation of AMI?*
  - b. Under what circumstances would sharing customer information be necessary for companies to provide utility service?*

- i. What specific information would it be necessary for companies to share to provide utility service?*
- ii. With whom or with what organizations would it be necessary for companies to share such information?*
- c. If not necessary for providing utility service, what information do companies anticipate sharing with third parties for the benefit of customers, and for what specific purpose should the utility share the information with third parties?*

PSE Response:

PSE's existing AMR meters and modules measure and report energy usage during a given time frame. This information includes daily reads, and may also include sub-hourly reads for some customers. This usage information is contained within the secured platforms of PSE and PSE's meter reading vendor.

- a.) PSE's AMI meters and modules will gather the same kinds of data as its AMR meters and modules. The AMI meters and modules also transmit diagnostic and connection information, such as meter ID and meter status data (i.e., whether the meter is operative). Both electric AMR and AMI meters report the amount of energy delivered back to the grid by solar customers.
- b.) PSE engages external vendors to support its utility services, such as new meter installations and network maintenance activities.
  - i. Customer name, address and customer contact information is sometimes necessary for a PSE vendor to conduct network maintenance activities or new meter installations.
  - ii. See part i. When necessary, information for applicable customers is provided only to the vendor doing the work.
- c.) PSE never sells private customer information or lets third parties use it for marketing purposes without the consent of the customer. Some government-sponsored programs such as for low-income customers or energy efficiency customers require the customer to prove eligibility or compliance with program rules. Often such information is delivered only by the customer directly to the applicable agency, bypassing PSE entirely. Even in situations where some relevant information such as energy usage is gathered by PSE and then shared with the government-sponsored auditing agency, PSE does not share information without consent of the customer. None of this data process is affected by AMI meters and modules.

*2. With respect to the information provided in response to Question #1, please respond to the following:*

- a. What kind of historical data, and for what time period, should companies maintain information in order to comply with regulatory reporting needs (load studies, conservation and energy efficiency, reliability)?*
  - i. How will companies dispose of customers' energy usage information collected from AMI when it is no longer needed or used?*
  - b. What rights do or should customers have with respect to their energy use data (co-owners of the data, right to access, right to share with third-parties)?*

- i. What type of customer notice should be required regarding the collection, storage, use, and disclosure of customer data (within a company and with third-parties)?*
- ii. How should the companies be required to obtain customer authorization to share data?*

PSE Response:

- a.) PSE follows and complies with all applicable data retention rules, such as those mentioned below, and retains information for the longest applicable retention requirement.
  - i. PSE will follow its existing data retention and destruction practices, which are not expected to change due to installation of AMI meters and modules. PSE follows UTC records retention rules under WAC 480-100-228 which includes a reference to guidance from the National Association of Regulatory Utility Commissioners paper entitled “Regulations to Govern the Preservation of Records of Electric, Gas and Water Utilities.”
- b.) WAC rules already protect the privacy of customer usage data. (e.g., WAC 480-100-153.) Customers also already have the right to review and inquire about their own usage, and when such information is provided to them, they can do with it what they please. Customers are already entitled to a test of the accuracy of their meter (e.g., WAC 480-100-183), and the meters must meet accuracy standards (WAC 480-100-338). Customers should not be considered “co-owners” of the data, as the given utility is obligated to collect the data (e.g., WAC 480-100-318), and the data is necessary to provide and properly bill for utility services.
  - i. PSE provides such notices on PSE’s website and as part of the customer application.
  - ii. Requiring a particular technology or method of obtaining consent may impede the use of technological improvements, e.g., for language translation purposes. However, companies should directly ask for consent and make a record of receiving it. WAC 480-100-179 already provides an example of this.

*3. How will companies manage and protect customers’ energy usage data generated by AMI technologies?*

- a. How should the rules differ for individual customer data and aggregated use data?*
- b. What data collected by AMI should be classified as personally identifiable customer information (PII)?*
  - i. How should the rules differ for Anonymous Personal Usage Information (defined as data not explicitly classified as PII that may reveal details, patterns, or other insights into the personal lives, characteristics, or activities of individual customers)?*
- c. How have companies evaluated cyber security risks in the planning, design, or implementation of the AMI system?*
  - i. Did your evaluation cause any changes to the plan or procurement of system components? How?*
  - ii. If you are using a third-party vendor for any portion of the AMI network, have you evaluated your supply chain for the necessary data security protections? Are there contractual requirements?*

- iii. In the event of a cyber security incident that impacts AMI meters or back office systems, what is your plan to mitigate the rate impact to customers?*
- iv. Are you purchasing (or do you plan to purchase) cyber security insurance for this project? Does this protection extend to third-party vendors in the event the breach of customer data is beyond your firewall?*
- d. Should the companies be required to report any breach of customer data to the Commission? If not, what set of parameters or threshold is appropriate to require reporting of a breach?*
- i. What timeframe should the companies be required to report the breach to the Commission?*
- e. Should the National Institute of Standards and Technology (NIST) cyber security standards form a basis for keeping customer data secure? If not, why?*

PSE Response:

PSE will protect customers' usage data generated by AMI per its data protection standards and policies – based on classification of data.

- a.) Neither individual customer usage data nor aggregated use data constitutes personally identifiable information. However, aggregated data that does not include individual customer information should not be restricted for utility use.
- b.) PSE's AMI meters and modules do not store or collect any data that should be considered PII. PSE's AMI meters and modules do not gather or transmit information about the name of the customer, their address or any other recognized personally identifying detail.
  - i. PSE's AMI meters and modules are being deployed to provide and potentially enhance utility service to PSE customers. PSE's AMI meters and modules do not track or report insights into the personal lives, characteristics or activities of individual customers. PSE's AMI meters and modules report energy usage and meter status.
- c.) PSE evaluated AMI technology in the same manner as other technological deployments are considered.
  - i. PSE decided to select and insist upon an advanced security system.
  - ii. Yes, any vendor (including AMI vendors) is contractually bound by PSE's security standards.
  - iii. PSE is unable to respond or evaluate this question without more details.
  - iv. PSE already purchases insurance for information security and privacy breaches, and that insurance applies to this project and all other PSE operations. In the event of a third-party vendor breach of customer data, PSE includes indemnification provisions in its vendor contracts and requires that vendors carry privacy liability insurance as primary coverage, with PSE included as additional insured.
- d.) Although PSE does not object to providing information to the Commission, other statutory and regulatory provisions already spell out customer notice requirements. PSE believes

that any new requirement should be consistent with those requirements. PSE already provides annual reports to the Commission about data security.

- e.) Yes, these standards are already followed by many companies, including PSE. They provide common standards for protecting data (NIST/CSF).

*4. How will customers have access to their energy usage information collected in AMI?*

*a. What platform will you use for customer data access?*

*b. How will you educate customers on viewing and using the platform?*

*i. Will the usage provided to customers be at the same granularity as programmed into the customer's smart meter? What type of outage reporting will you provide?*

*c. What time intervals will you use to send customers their energy usage data (near real-time, sub-hourly, daily)?*

PSE Response:

PSE will continue to provide customer access to data in the same manner as PSE already does.

- a.) Customers will continue to access their data via a user account on PSE.com
- b.) PSE customers continue to access PSE.com. The site includes FAQ's and the means to contact PSE for further assistance in navigating and understanding their energy usage.
- i. PSE has not yet defined what if any differences in granularity might be available. PSE's electric outage reporting is already online and will not be different for customers with AMI meters and modules than those with the existing AMR technology.
- c.) PSE does not intend to send energy usage data to customers more frequently than on the applicable bill for the particular account and the applicable period. However, some additional data may be available more frequently for customers who subscribe to particular programs, and who access their individual account information themselves. One existing example is PSE customers who subscribe to PSE's energy efficiency programs. Those customers have awareness tools available through PSE's vendor OPower that are accessible via a portal with a secure login.

**Prepaid Service and Customer Deposits**

*5. What kind of prepaid services will you implement for AMI customers?*

*a. Will companies keep separate accounting records for prepayment services associated with AMI?*

*b. Will the prepayments accrue interest?*

*c. How do companies anticipate changing deposit calculations based on information available from AMI technology?*

*d. How will you address the issue of customers receiving a double bill for the transition month, which will include both the closing bill for post-read billing and the first month of prepayment?*

PSE Response:

At this time, PSE is considering prepaid service pilots to test whether two common applications for these types of services could work in PSE's service territory. However, PSE has not developed or proposed a tariff schedule to implement this possibility formally across all customers.

- a.) PSE would expect to maintain separate records to allow for proper assignment of costs, contacts, calls, self-service payments, and other elements.
- b.) Prepay credits would expect to apply to near-term future usage and would only be carried for a short time. As such, PSE would not expect the average prepay balance to be a significant sum or to accrue significant interest.
- c.) PSE does not plan to assess deposits for pre-payment customers. Prepaid services would be offered as an advantage to customers in lieu of a monthly payment. AMI meters and modules have detailed usage data that can be used to calculate average prepay credit. Those individual calculations are determined by the customer's own usage history rather than an average.
- d.) PSE would develop a proposal to address this concern when we are ready to offer this service.

*6. How will prepayment systems comply with notice requirements?*

PSE Response:

PSE will explain and demonstrate how notices for prepay will comply with notice requirements in any proposed prepaid-service tariff schedules.

*7. How will you incorporate energy assistance into prepayment agreements?*

PSE Response:

PSE would work collaboratively with its existing community action agency partners on a process to use individual customer past due disconnect notifications and bills to determine customer eligibility for PSE's electric and natural gas Schedules 129 Home Energy Lifeline Program.

## **Remote Disconnection**

8. *What are the advantages and limitations of remote disconnection?*

PSE Response:

PSE provides the following examples of advantages remote connection and disconnection:

- Remote connection and disconnection occurs via a network thereby preventing a truck roll and thereby reducing labor costs.
- Remote connection and disconnection can allow for service starts and stops to be scheduled around the customer's own schedule. For example, a move-in could be automatically scheduled to match the day/time when a customer plans to move into a home.
- Remote connection and disconnection creates a more consistent customer experience during disconnection and reconnection for non-pay along with minimizing re-noticing for 'expired' disconnect orders.
- Remote connection and disconnection increases utility flexibility and efficiency to shorten service windows for customer requests, reduces backlog of service order by allowing better prioritization, improves processes around Unauthorized Energy Usage and compliance, and expedites reconnection by remotely confirming necessary safety precautions.

Remote connection and disconnection may also have some potential limitations including a dependency on AMI network conditions, or systems alignment issues in cases of lost or undelivered messages. These limitations can be mitigated through thoughtful planning and deployment of AMI network assets. In rare circumstances, a failed remote connection or disconnection request may result in a site visit of the meter. Finally, remote connection and disconnection is not available for large power or natural gas meters due to equipment limitations and process requirements for their disconnection or reconnection.

9. *If the Commission allows remote disconnections for non-payment, in what circumstances would you remotely disconnect customers?*

PSE Response:

PSE would follow applicable Commission or tariff rules, but such choices would most often be made on the basis of efficiency and safety. PSE envisions that before any remote disconnect would occur, a customer would be allowed sufficient time to call and request same day reconnect. Other circumstances that may require remote disconnect and reconnect could include safety related situations such as a fire, a move out due to vacancy, or temporary move out scenarios for customers with other residences.

*10. What percentage of current disconnection visits result in the customer making a payment to stop the impending disconnection after the service technician makes contact, but before service is disconnected?*

PSE Response:

In 2017, PSE had 376,821 disconnect notices and made a disconnect visit to 31 percent of these notices. Of that 31 percent of visits, 33 percent of customers made a payment. This equates to about 10 percent of all actual disconnects for the year.

*11. Is it necessary to modify current rules governing disconnection or customer notice rules to allow companies to remotely disconnect and reconnect customers?*

PSE Response:

PSE does not foresee changes to the disconnection process or noticing practices, except to include information within the notices that disconnection of service would occur remotely. PSE will continue to comply with the rules governing notification requirements (*i.e.* sections 6 in WAC 480-90-128 and WAC 480-100-128) and will offer customers digital notifications in addition to those required in the WAC if the customer signs up for that type of notification method.

*12. During what time of day should disconnection and reconnections occur (e.g., before noon, 24 hours a day, or during business hours only)?*

*a. In the case of a customer disconnected for non-payment, how long will the company take to remotely reconnect service after payment has been received?*

PSE Response:

Without AMI disconnections and reconnections are scheduled consistently throughout the business day to ensure consistent service levels, customer experience and allow for managed workforce planning at PSE. With AMI, PSE would consider customer payment options that are available for reconnection and devise a process that provides the most options. With remote connection and disconnection PSE would enable same-day reconnections to the greatest extent possible.

- a.) Generally speaking, PSE anticipates the time to reconnect would be significantly less than the current method given the capability of the AMI technology, likely in a matter of minutes after payment has been satisfied.

## **Meters**

*13. What meters will the companies be installing in Washington State (brand, make, model)?*

*a. What are the parameters for measuring and testing the accuracy of the meters?*



*b. What accuracy range do manufacturer(s) guarantee for those meter sets?*

PSE Response:

In its AMI deployment, PSE will be using Landis+Gyr's Gridstream RF Mesh residential<sup>1</sup> and commercial<sup>2</sup> meters for electric customers, and Landis+Gyr's M120 Series residential<sup>3</sup> and GPR commercial & industrial<sup>4</sup> natural gas modules for natural gas customers.

a.) PSE follows current WAC rules for testing of meters. The Company maintains its compliance with these rules for all meters, i.e. both existing AMR meters and those meters equipped with AMI technology. As these meter standards apply to the physical meter and the fact the natural gas meter is not changed out while the attached communication module is changed from an AMR model to an AMI model, PSE requires that natural gas meters conform to these accuracy requirements when supplied with any communication module (AMR or AMI).

The WAC rules covering meter testing include:

- WAC 480-90-343 for Gas Meter Test Procedures
- WAC 480-90-333 for Gas Initial Accuracy
- WAC 480-90-338 for Gas Meter Tolerance
- WAC 480-100-343 for Electric Meter Test Procedures
- WAC 480-100-333 for Electric Initial Accuracy
- WAC 480-100-338 for Electric Accuracy Requirements for Electric Meters

As prescribed in WAC 480-90-343 and WAC 480-100-343, PSE includes statements on test procedures in its natural gas and electric tariffs. For natural gas meters, PSE's natural gas tariff WN U-2, Rule No. 25-Meter Testing Procedures, Section 2.2 covers the accuracy testing of the natural gas meters. It states that meters will meet or exceed ANSI standards B109.1, B109.2, and B109.3. Section 3.3 of Rule No. 25 states that the minimum acceptable accuracy for all new and rebuilt natural gas meters is 100 percent +/- 1 percent at specified flow rates.

PSE's electric tariff WN U-60, Schedule 80- General Rules and Provisions, Section 20.b covers PSE's electric meter test procedures. These procedures extend to all meter types. The testing procedures follow ANSI standard C12.1 and use the most recent revision of ANSI/ASQC-Z1.9. New meters are tested to be at 100 percent +/- 0.5 percent accuracy. In-service meters are tested to ensure they are within the tolerances allotted in WAC 480-100-141

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<sup>1</sup> Landis+Gyr Product Specification Sheet for E331 Focus Axe-SD and E351 AX-SD Single phase meters, [https://www.landisgyr.com/webfoo/wp-content/uploads/2014/08/PS\\_FocusMeterE331AXe\\_E351AXeSD.pdf](https://www.landisgyr.com/webfoo/wp-content/uploads/2014/08/PS_FocusMeterE331AXe_E351AXeSD.pdf)

<sup>2</sup> Landis+Gyr Product Specification Sheet for E650 S4x Polyphase meters, [https://www.landisgyr.com/webfoo/wp-content/uploads/2014/11/PS\\_E650S4xPolyphase.pdf](https://www.landisgyr.com/webfoo/wp-content/uploads/2014/11/PS_E650S4xPolyphase.pdf)

<sup>3</sup> Landis+Gyr Product Specification Sheet for Gridstream M120 RF Residential Gas Modules, [https://www.landisgyr.com/webfoo/wp-content/uploads/2012/12/PS\\_GridstreamM120ResGasModule.pdf](https://www.landisgyr.com/webfoo/wp-content/uploads/2012/12/PS_GridstreamM120ResGasModule.pdf)

<sup>4</sup> Landis+Gyr Product Specification Sheet for Gridstream GPR-PT Commercial & Industrial Pressure and Temperature Monitoring Module, [https://www.landisgyr.com/webfoo/wp-content/uploads/2012/12/PS\\_GPR-PT-CIPressureTempModule.pdf](https://www.landisgyr.com/webfoo/wp-content/uploads/2012/12/PS_GPR-PT-CIPressureTempModule.pdf)

at the individual meter level, and that the set acceptable quality level is not exceeded for any meter population.

b.) Landis+Gyr rates its residential electric meters with an accuracy class of 0.2 percent. Landis+Gyr commercial electric meter accuracy depends upon the class of meter and form, but is stated to be either +/- 0.2 percent or +/- 0.5 percent.<sup>5</sup>

14. Are you aware of any health or safety concerns related to AMI?

a. What research have you conducted concerning health or safety for the meter sets you will be purchasing?

b. Please provide copies or electronic links to the research and any studies on which you have relied.

PSE Response:

PSE is aware that some customers have expressed health or safety concerns related to AMI. PSE has found no evidence that AMI is actually unsafe or detrimental to health.

a.) PSE researched health and safety concerns prior to deploying its AMI including analysis of radio frequency (“RF”), electromagnetic frequency (“EMF”) and the physical safety of the metering hardware. Regarding health concerns around RF and EMF, PSE refers the Commission to the Washington State Department of Health study publication entitled *Responding to Wi-Fi Concerns in our Schools*<sup>6</sup>. In 2014, the Department of Health published its evaluation of comprehensive studies of RF radiation and any correlation to health effects. These studies were conducted by respected health agencies from around the world and concluded the following:

*“Among the 15 documents that were evaluated, 11 concluded there is no clear and consistent evidence that low levels of RF have any adverse health effects. The other four concluded there is limited and uncertain evidence that cell phone use can cause brain tumors; however, these four documents also concluded there is no evidence that RF field exposure at levels much lower than cell phones (which would include Wi-Fi) has any adverse health effect.”<sup>7</sup>*

The Washington Department of Health concluded that there is no evidence of harmful effects caused by RF at levels that are above those at which smart meters operate. Additionally, AMI meters and modules communicate far less often than cell phones, Wi-Fi or the current AMR meters and modules they will replace.

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<sup>5</sup> See product specification sheets cited in footnotes 1-4.

<sup>6</sup> <https://www.doh.wa.gov/Portals/1/Documents/Pubs/320-100-WiFiSafetyInSchoolsSept2014Final.pdf>

<sup>7</sup> “Responding to Wi-Fi Safety Concerns in our Schools.” Office of Superintendent of Public Instruction of Washington and Washington State Department of Health, September 2014.

[https://www.doh.wa.gov/Portals/1/Documents/4100/WiFiSafety\\_Jan2014\\_DraftFinal.pdf](https://www.doh.wa.gov/Portals/1/Documents/4100/WiFiSafety_Jan2014_DraftFinal.pdf)

PSE also engaged an independent expert on non-ionizing radiation and RF to better understand the international guidelines on non-ionizing radiation exposure. These guidelines originate with the International Commission on Non-Ionizing Radiation Protection (“ICNIRP”). This expert’s opinions echoed those of the global consensus, which is that RF is not harmful, and that RF exposure from AMI meters is approximately 60,000 times less than the ICNIRP guidelines. PSE’s expert, Andrew Thatcher, has served as the non-ionizing radiation expert for the State of Washington for 18 years. His other credentials and experience are available on his website at <http://rfthatcher.com/>.

Regarding physical safety, Landis+Gyr meters have completed UL 2735 certification from Underwriter Laboratories (“UL”), a voluntary safety standard for electric utility meter safety. This standard covers electric shock, fire, mechanical and RF emissions testing.<sup>8</sup>

Finally, PSE notes that it has not had a meter-reading staff for nearly twenty years and recognizes that its meter upgrade project is an opportunity to assess physical safety aspects of customer connection points during the exchanges. Field personnel will conduct an inspection of the connection point for any indication of an unsafe condition such as corrosion or physical damage to the meter or the customer’s meter base before exchanging the meter.

- b.) PSE primarily defers to the consensus developed from a global body of research on RF examined by the Washington Department of Health:

*Responding to Wi-Fi Safety Concerns in our Schools*; Office of Superintendent of Public Instruction of Washington and Washington State Department of Health; Appendix A; pages 8-9, September 2014. <https://www.doh.wa.gov/Portals/1/Documents/Pubs/320-100-WiFiSafetyInSchoolsSept2014Final.pdf>

Additionally, PSE refers to information provided by the American Cancer Society, the National Institute of Environmental Health Services, and the Commission:

*Smart Meters*; American Cancer Society; <https://www.cancer.org/cancer/cancer-causes/radiation-exposure/smart-meters.html>.

*Electric and Magnetic Fields*; National Institute of Environmental Health Services. <https://www.niehs.nih.gov/health/topics/agents/emf/index.cfm>.

*Smart Meter Basics*; Washington Utilities and Transportation Commission. <https://www.utc.wa.gov/consumers/Documents/2013-6-11%20FINAL%20Smart%20Meter%20Basics.pdf>.

15. Please explain your current tampering and theft detection process.  
a. How might AMI technology alter that process?

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<sup>8</sup> <https://www.landisgyr.com/landisgyr-receives-underwriter-laboratories-certification-advanced-residential-meters/>

PSE Response:

PSE's tampering and theft detection processes are kept confidential to ensure those seeking to harm PSE's equipment are less able to circumvent those processes.

- a.) Generally, AMI technology will allow PSE increased visibility compared to current technology and will allow for more timely notification and resolution of potential meter tampering or theft situations. AMI will continue to allow PSE to keep customer safety as a priority.

**Billing Requirements**

*16. In what circumstances do you believe estimating a customer's bill will be required with AMI?*

PSE Response:

When PSE's AMI is fully deployed and operational, the only circumstance that may require estimating a customer bill would be a meter failure or malfunction.

*17. Generally, what type of reporting will be available on customer bills as it relates to usage? More specifically:*

- a. *What mechanism in customers' bills will display customer-elected load curtailment and control?*
- b. *What type of reporting will you provide as it relates to tamper and theft detection?*
- c. *What type of reporting will you provide as it relates to voltage reduction?*

PSE Response:

PSE has no plans at this time to change its bill print or design pertaining to displaying usage information during or after deployment of its AMI network and metering equipment. Customers will see the same usage information as they do on their bills today.

- a.) PSE is still in the early phases of evaluation of any offering of load control services such as demand response. PSE has conducted a demand response pilot and is currently conducting a demand response request for proposal ("RFP") under Docket UE-180272. More information on PSE's demand response RFP can be found at [https://pse.com/aboutpse/EnergySupply/Documents/2018\\_Demand\\_Response\\_RFP\\_FAQs\\_\(last\\_updated\\_6-8-18\).pdf](https://pse.com/aboutpse/EnergySupply/Documents/2018_Demand_Response_RFP_FAQs_(last_updated_6-8-18).pdf).

If and when PSE decides to offer additional load curtailment services to customers, it will evaluate the best mechanisms for billing and customer payment.

- b.) PSE does not plan to provide customers with meter equipment tampering reports on their bills.
- c.) PSE has no plans to change its bill print and design or to provide any additional reports on customer voltage reduction.

*18. Will the AMI system give customers the ability to program budget billing and conservation goals?*

PSE Response:

PSE will continue to offer its budget payment plan option and energy efficiency services to all residential customers during and after the installation of AMI. In addition, PSE is optimistic that AMI will enhance the effectiveness of the Company's energy efficiency and conservation services.

*19. Explain the rate and bill flexibilities you will offer customers in conjunction with AMI deployment.*

PSE Response:

Currently, PSE is not planning to offer additional bill or rate flexibilities in conjunction with its AMI deployment. PSE will continue to offer existing services such as budget pay, Green Power, net metering and others. However, AMI may enable or enhance PSE's future capability to offer services that create bill and/or rate flexibilities such as prepayment, time-varying rates, demand response and other services. PSE is still exploring AMI's potential for these services.

## **Customer Education**

*20. Please identify the policies and education programs will you use to inform customers about the following:*

- a. How to report suspected equipment malfunction.*
- b. How to get help reading usage, voltage reduction reports, and outage reports.*
- c. How to use the AMI technologies to curtail electricity use, and the potential to help control peak demand for all customer classes.*

PSE Response:

- a. The reporting of a suspected equipment malfunction will be specified on the PSE website such as directing customers to easy self-selection and resolutions or directions to the PSE call center for resolution.
- b. Customers can get help with reading usage or other voltage and outage issues on the PSE website, through videos, and other outreach mechanisms for using a customer's MyPSE account as a starting point for getting this information, and additional call options beyond MyPSE.
- c. As explained above, PSE is currently evaluating the demand response market by conducting an RFP. PSE will make a decision about demand response product offerings after evaluating the proposals received in its RFP. If and when PSE elects to offer optional

demand response products, customer education on curtailing energy use, and the potential to help control peak demand for all customers would be specified in PSE's proposed tariff schedule(s).

PSE appreciates the opportunity to provide responses to the questions identified in the Commission's Notice of Opportunity to File Written Comments. Please contact Eric Englert at (425) 456-2312 or Spencer Jones at (425) 457-5382 or Nate Hill at (425) 457-5524 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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