



**STATE OF WASHINGTON**  
**UTILITIES AND TRANSPORTATION COMMISSION**  
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September 4, 2015

**NOTICE OF OPPORTUNITY TO FILE WRITTEN COMMENTS**  
**(By Monday, October 5, 2015)**

Re: Rulemaking to Consider Adoption of Rules Relating to Electric and Natural Gas Companies, Docket U-144155

TO ALL INTERESTED PERSONS:

On February 18, 2015, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider adoption of rules within WAC 480-90-178 and WAC 480-100-178 to establish common standards for all the regulated energy companies to identify and correct stopped meters and unidentified energy usage issues and provide incentives for companies to make appropriate resource allocation to reduce retroactive bill duration related to the forgoing circumstances.

On September 2, 2015, the Commission filed a supplemental CR-101 to that noticed at WSR #15-05-082 to consider expanding the rulemaking to all corrected billing situations. The supplemental CR-101, filed with the Code Reviser at WSR # 15-18-121, is available for inspection on the Commission's website at [www.utc.wa.gov/144155](http://www.utc.wa.gov/144155). If you are unable to access the Commission's web page and would like a copy of the CR-101 mailed to you, please contact the Records Center at (360) 664-1234.

As a result of the comments received on July 21, 2015, Commission staff has developed revised draft rules for review and comment by interested persons. The draft rules are also available for inspection on the Commission's website at [www.utc.wa.gov/144155](http://www.utc.wa.gov/144155). If you would like a copy of the revised draft rules mailed to you, please contact the Records Center at (360) 664-1234.

It is reasonable to expect utilities to correct billing errors, identify and correct stopped meters, as well as unidentified energy usage, within a reasonable timeframe to minimize the corrected bill generated to correct the billing error or inaccurate energy usage metering.

The Commission is seeking written comments from interested persons related to rules to encourage regulated utilities to identify and correct faulty meters in a timely fashion. While the Commission does not want to unduly limit comments, responses to the following questions would be most helpful:

1. Please provide the three most recent years of data regarding the number of corrected bills issued for under-billed amounts due to meter failure or malfunctions, or unassigned energy usage meters that exceeded six months in duration. Please provide the information in the following format:

Year	Residential		Non Residential		Total Revenue
	Number of accounts issued corrected bills exceeding six months	Total amount billed in excess of six months	Number of accounts issued corrected bills exceeding six months	Total amount billed in excess of six months	Company's total revenue
2012					
2013					
2014					

2. Please provide the three most recent years of data regarding the number of corrected bills issued for under-billed amounts due to all other billing errors (excluding meter tampering, fraud and estimated bills.) Examples include: corrected bills for incorrect prorated bills; mislabeled meter bases; incorrectly installed meters; incorrect billing rate schedules; and incorrect billing multipliers. Please provide the information in the following format:

Year	Residential		Non Residential		Total Revenue
	Number of accounts issued corrected bills exceeding six months	Total amount billed in excess of six months	Number of accounts issued corrected bills exceeding six months	Total amount billed in excess of six months	Company's total revenue
2012					
2013					
2014					

3. The rationale for requesting the exclusion of non-residential customers from the six month billing correction limitation is unclear.
  - a. Please provide additional rationale and examples of why it is important to exclude non-residential customers.
  - b. Please provide an explanation of the terms “small business customer,” “commercial customer,” “large commercial customer,” and “industrial customer.”
  - c. Please provide the following additional data regarding seasonal commercial customers. Also, please provide an explanation of how seasonal commercial customers pose a problem for companies to identify and correct billing problems.

Year	Seasonal Commercial Customers		Total Revenue
	Number of accounts issued corrected bills exceeding six months	Total amount billed in excess of six months	Seasonal customer revenue
2012			
2013			
2014			

4. Please provide the most recent three years of data for corrected bills related to over-billing.

Year	Residential		Non Residential	
	Number of accounts issued refunds exceeding six months	Total amount of refunds in excess of six months	Number of accounts issued refunds exceeding six months	Total amount of refunds exceeding six months
2012				
2013				
2014				

5. Please describe all current procedures in place to prevent and identify billing errors resulting from: incorrect prorated bills; mislabeled meter bases; incorrectly installed meters; incorrect billing rate schedules; or incorrect billing multipliers.

The Commission invites initial written comments on these and other issues related to developing rules to encourage regulated utilities to identify and correct billing errors and faulty meters in a timely fashion.

### WRITTEN COMMENTS

Written comments on the supplemental CR-101 inquiry, issues listed above, and revised draft rules must be filed with the Commission no later than **5:00 p.m., Monday, October 5, 2015**. The Commission requests that comments be provided in electronic format to enhance public access, for ease of providing comments, to reduce the need for paper copies, and to facilitate quotations from the comments. You may submit comments via the Commission's Web portal at [www.utc.wa.gov/e-filing](http://www.utc.wa.gov/e-filing) or by electronic mail to the Commission's Records Center at [records@utc.wa.gov](mailto:records@utc.wa.gov). Please include:

- The docket numbers of this proceeding (Docket U-144155).
- The commenting party's name.
- The title and date of the comment or comments.

An alternative method for submitting comments is mailing or delivering an electronic copy to the Commission's Records Center on a flash drive, DVD, or compact disk, in .pdf Adobe Acrobat format or in Word 97 or later format. Include all of the information requested above. The Commission will post on its web site all comments that are provided in electronic format. The web site is located at <http://www.utc.wa.gov/144155>.

If you are unable to file your comments electronically the Commission will accept a paper document. If you have questions regarding this rulemaking, you may contact staff lead, Roger Kouchi, at (360) 664-1101, or by email at [rkouchi@utc.wa.gov](mailto:rkouchi@utc.wa.gov).

STEVEN V. KING  
Executive Director and Secretary