



Puget Sound Energy
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UE-180860
UG-180861
UE-220066

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Kathy Hunter, Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503-1036

**Re: PSE Electric and Natural Gas Schedules 171 Status Reporting
Per Order 01 of Dockets UE-180860 and UG-180861 and
Final Order 24/10 in Dockets UE-220066, UG-220067, & UG-210918 (Consolidated)**

Dear Executive Director Hunter:

Pursuant to Order 01 in Dockets UE-180860 and UG-180861, Puget Sound Energy (“PSE”) provides its eighth report of its electric and natural gas Schedules 171 implementation status. PSE’s electric and natural gas Schedules 171 provide the Optional Non-Communicating Meter (“NCM”) Service for residential customers, which is consistent with the Commission’s Policy on Customer Choice for Smart Meter Installation under Docket U-180117. The enclosed Meter Upgrade Project and Schedules 171 Implementation Status Report reflects the status of PSE’s Meter Upgrade Project and Schedules 171 customer requests and accounting records as of December 31, 2023.

Order 01 in Dockets UE-180860 and UG-180861 required PSE to file a status report every six months (January 31 and July 31) regarding the implementation status of its Schedule 171 Optional Non-Communicating Meter Service. However, going forward from the 2023 reporting period, the semi-annual NCM reporting requirement has been discontinued per the Commission’s Final Order 24/10 in Dockets UE-220066, UG-220067, and UG-210918 (Consolidated). PSE proposed the change because PSE believes annual reporting was sufficient for monitoring NCM optional service. Both Commission Staff and Public Counsel supported ending the NCM semi-annual report to streamline PSE’s reporting to the Commission.

For more than 20 years, PSE has been on an automated meter reading (“AMR”) platform. With the exception of a small group of specialized or isolated meters that require manual reading, nearly 100% of the electric and natural gas meters have been read automatically. Because the AMR infrastructure is aging and metering technology is advancing, PSE has been in the process of exchanging its AMR network and metering equipment with advanced metering infrastructure (“AMI”) *i.e.*, PSE’s Meter Upgrade Project. This project will eventually replace approximately 1.2 million AMR electric meters and 0.9 million natural gas AMR modules across all ten counties in

PSE's service territory with facilities that are compatible with AMI technology. As of the end of 2023, the following number of mass exchange of AMI electric meters and natural gas modules by PSE's AMI equipment installers had been completed: 1,170,111 electric modules and 854,780 natural gas modules. Starting in January of 2024, PSE personnel from electric and natural gas meter operations will continue to exchange the remaining AMI metering equipment for about 24,000 electric and 20,000 natural gas meter upgrades.

In order to make the optional NCM service ready on July 1, 2019, PSE's preparation started in 2018. PSE has established the manual meter reading process that works with the existing information technology infrastructure and available resources. In addition to those tailored information systems changes for metering, tracking, billing, and reporting, PSE also has set up customer care staff and communication processes to support residential customers who are interested in a non-communicating meter.

As indicated in the January 2020 Meter Upgrade Project and Schedules 171 Implementation Status Report, PSE has been contracting out manual meter reading services with an independent contractor. In this report, PSE includes the costs regarding the one-time set up fee and the annual fixed charges associated with this manual meter reading services contract and the costs associated with the ongoing manual metering reading that PSE has been invoiced as of December 31, 2023.

The attached report provides, as of December 31, 2023, the results and discussions pertaining to the implementation of electric and natural gas Schedules 171 for the following topics:

1. status of PSE's Meter Upgrade Project, including geographic areas where AMI meters have been installed and the number of meters installed;
2. information on customer communications, including the number of customers who have informed PSE of their Initial Request for service under Schedule 171;
3. the number of customers on electric and natural gas Schedules 171, including a) the number disconnected for non-payment, b) the number receiving bill payment assistance, and c) status of their Schedule 171 One-Time Charge payment;
4. PSE costs associated with the implementation of electric and natural gas Schedules 171, including capital costs and maintenance costs for information systems, meter exchange, meter reading, and other related costs;
5. revenues associated with electric and natural gas Schedules 171;
6. the number of Initial Requests that did not result in a submitted and completed Service Request;
7. the number of electric and natural gas Schedules 171 customers who discontinued service on Schedule 171; and
8. a discussion of other issues associated with providing service under electric and natural gas Schedules 171.

Executive Director Hunter

January 29, 2024

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Please contact Mei Cass at mei.cass@pse.com for additional information about this filing. If you have any other questions, please contact me at birud.jhaveri@pse.com.

Sincerely,

/s/ Birud D. Jhaveri

Birud D. Jhaveri
Director, Regulatory Affairs
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cc: Andrew Roberts, UTC

Attachment:

UE-180860-UG-180861-PSE-8th-Sch-171-Status-Rpt-(1-29-24).docx