

WAC 480-90-178 480-100-178 Topic	Commenter	Comment	Staff Response
Economic hardship experienced by ratepayers as a result of utility equipment or billing practice errors	State Rep. Matt Shea 4 th Legislative District	<p>The rulemaking does not adequately explore the existence of ratepayer inconvenience or hardship that presently exists or would exist if companies can back-bill for up to six months of under-billing. Suggested data that should be sought and analyzed before the rule is finalized:</p> <ul style="list-style-type: none"> • What percentage of customers who are back-billed ask for help with payment arrangements and what percentage are already receiving low-income assistance of any sort for their utilities? • What the average dollar value of back-billed amounts is of those who ask for payment arrangements? • What is the relationship, if any, between those asking for payment arrangements and the number of months of “under-billing” for which they were back-billed? • How many who ask for payment arrangements are able to successfully manage those arrangements on the original timetable, or need extension? • What is the average length of a payment arrangement schedule and average monthly payment amount for those arrangements made to satisfy a back-bill? • Do any number of those who were back-billed subsequently curtail/reduce their average monthly utility usage—a sign of potential financial hardship? 	Chairman Danner responded to Representative Shea by letter on Oct. 13. A copy of the letter is posted in Docket U-144155.

Unassigned usage	PPL	<p>Pacific Power and Light (PPL) requests unassigned usage be removed from the proposed draft rules. The company believes any changes to the rules regarding unassigned usage should be addressed in WAC 480-100-128(2)(f). However, should the commission determine to include unassigned usage in the proposed changes to WAC 480-100-178, PPL recommends that “unassigned usage” be included as a separate subsection.</p> <p>PPL proposes to move unassigned usage from subsection (6)(a) to a new subsection (6)(b) to differentiate it from the corrected billing received due to a meter failure or malfunction or billing error.</p>	Staff disagrees. Staff believes unassigned energy usage is easy to detect and correct within six months. The company should take immediate action to contact the occupant to apply for service. If a customer fails to respond, the company should take timely action to disconnect service to preclude undue lengthy corrected bills.
	PSE	<p>Puget Sound Energy (PSE) requests the Commission remove “a meter with unassigned energy usage” from the draft rules requiring a utility to issue a corrected bill within sixty days upon determination. PSE supports a sixty day threshold for issues related to stopped meters, meter failure or malfunction, but not issues related to unassigned energy usage (“UEU”). Unlike a stopped meter, a meter with unassigned energy usage is the result of a customer failing to start energy service with the utility after move-in. As discussed in PSE’s previous comments, reaching the UEU threshold is not time-based but rather based on reaching a threshold of usage that is balanced between allowing adequate time for the customer to sign-up for service and avoiding the cost of a PSE truck roll. In some circumstances, the utilization is very low and may take months before the initial threshold triggers an investigation.</p>	
	NWNG	<p>The Company acknowledges that when it learns of unassigned energy usage that a corrected bill is issued. However, because unassigned energy usage is the direct result of the failure of a customer to inform the Company of their obligations for service, the inclusion of these</p>	Staff agrees to revise the definition of unassigned energy usage as proposed by Northwest Natural Gas (NWNG).

		<p>types of bill corrections in a rule where the purpose of the rule is to address corrected bills due to some cause related to the utility’s facilities or utility action, is problematic.</p> <p>Extended periods of unassigned usage are somewhat rare, but they do occur. The Company’s preference would be to exclude unassigned usage from this rule altogether.</p>	<p>NWNG recommended revising Section (5)(b)(ii) as follows:</p> <p style="padding-left: 40px;">(ii) for the purpose of this rule, unassigned energy usage meter is defined as a meter</p> <p style="padding-left: 40px;">that <u>is installed at a valid service address and has accurately recorded and transmitted</u></p> <p style="padding-left: 40px;"><u>energy usage during a period of time where there was no active gas service account at</u></p> <p style="padding-left: 40px;"><u>that premise. Correctly records and transmits energy usage but does not have a customer assigned to the account.</u></p>
Clarification changes	PPL	<p>PPL proposes replacing “Upon discovery of” and “discovered” with “When the utility has determined” and “confirmed” with “determines” in the last sentence. This change would give more clarity as to when the sixty day clock starts for issuing a billing correction. PPL proposes to clarify the rules by stating from the “date the utility determines the error” in order to allow time for investigation and confirmation of the error.</p>	<p>Staff disagrees that the terms “upon discovery of” and “discovered” should be replaced with “when the utility has determined.”</p> <p>Staff would agree to change the last sentence in paragraph (5)(a) to read: However, except as provided for in subsection(7), when a utility discovers that it has under-billed a customer, it may not seek to collect from that customer for any period greater than six months from the date the error occurred.</p>
	PSE	<p><i>WAC 480-90-178(5)(a) and WAC 480-100-178(5)(a)</i>: PSE is unclear with the term “upon discovery” and “discovers” in this section of the draft rules. PSE recommends replacing “upon discovery” with “from the date the utility determines” in the first sentence and replacing “discovers” with “determines” in the last sentence. This change would give more clarity as to when the sixty day clock starts for issuing a billing correction. A potential billing error often requires investigation</p>	

		<p>and confirmation, and it is unclear whether sixty days would begin before or after a utility has investigated and confirmed the meter is malfunctioning. From PSE’s perspective, the rules would be made clear by stating from the “date the utility determines the error” in order to ensure time for investigation and confirmation of the meter malfunction and issuance of the corrected billing statement.</p> <p><i>WAC 480-90-178(6)(f) and WAC 480-100-178(6)(f):</i> PSE proposes to eliminate the phrase “an explanation of” from this section because it is unclear and ambiguous what should be included in an explanation of the availability payments arrangements beyond the payment arrangements themselves. For clarity, PSE proposes this section to read “<i>the availability of payment arrangements in accordance with WAC 480-90-138(1)², Payment arrangements.</i>”</p>	<p>Staff believes this change would provide the utilities the flexibility required to determine the date when the error occurred.</p> <p>Staff disagrees with PSE’s proposal to eliminate the phrase “an explanation of” from WAC 480-90-178(6)(f) and WAC 480-90-178(6)(f). The utility should provide an explanation of the availability of payment arrangements in accordance with WAC 480-90-138(1) and WAC 480-100-138(1).</p>
	NWNG	<p>NWNG recommends that the sentence be modified to remove any ambiguity created from the use of the word “discovery.” The Company’s suggested language is as follows:</p> <p style="text-align: center;">The utility must issue the corrected bill within 60 days from the date the utility <u>confirmed that an account had been</u> the under- or over-billeding.</p>	
	Avista	<p>In Section 5(a), Avista proposes that the language in the first sentence: “a utility must issue a corrected bill to a customer to recover or refund billed amounts” be modified to read: “a utility <u>may</u> issue a corrected bill to a customer to recover under-billed amounts and must issue a corrected bill to a customer to refund over-billed amounts.” Essentially, this modification gives the utility flexibility to not back bill a customer who has been under-billed, which is helpful in certain situations. For example, in a switched meter or mislabeled meter base situation, the</p>	<p>Staff disagrees. The company should always make an attempt to issue a corrected bill to a customer to recover under-billed amounts and must attempt to issue a corrected bill to a customer to refund over-billed amounts.</p>

		<p>customer may no longer be a customer to issue the corrected bill. This flexibility would be both a benefit to the customer and the utility.</p> <p>In Section 6, Avista proposes that item (e): “The actions taken to eliminate the cause of the bill correction” be removed. The reason for the bill correction is already included in part (a), therefore, the company does not believe this requirement will add additional value. Also, messaging is limited on a bill so the company would propose to eliminate any requirements that may not be needed. Issuing a letter will be necessary in some situations, but also comes at an added cost.</p> <p>In Section 6(f), Avista proposes the language be modified to read as follows: “<u>When issuing a corrected bill for under-billing</u>, an explanation of the availability of payment arrangements ...” The company proposes this modification as payment arrangements do not apply to situations when a utility issues a corrected bill or refund for an over-billing.</p>	<p>Staff would agree with Avista’s proposed language modification in Section 6(f). In Section 6(f), Avista proposes the language be modified to read as follows: “<u>When issuing a corrected bill for under-billing</u>, an explanation of the availability of payment arrangements ...” The company proposes this modification as payment arrangements do not apply to situations when a utility issues a corrected bill or refund for an over-billing.</p>
	<p>NWNG</p>	<p>Section (6). NWNG has suggested changes to several items in this section.</p> <p>First, NWNG suggests that the last sentence in the first paragraph of this section be revised as follows:</p> <p style="padding-left: 40px;">When a corrected bill is issued, the utility must provide the following information <u>with</u> on the corrected bill or in a letter sent to the customer.</p> <p>This change will accommodate the use of bill inserts, as stating this information on the actual bill in many cases cannot be accommodated.</p> <p>Second, with regard to item (b), NWNG suggests that this section be revised to make this something that is available on request, but that</p>	<p>Staff disagrees with NWNG’s proposed changes to Section (6). The required information should not be made available upon request. All the information should be provided when the corrected bill is sent to the customer. Staff can agree to modify the language in paragraph (6) to read:</p> <p>When a corrected bill is issued, the utility must provide the following information on the corrected bill, in a bill insert, in a letter or any combination of methods that clearly explains all the information required to be provided to the customer.</p>

		<p>is not a required feature of the corrected bill. There are a couple of reasons that support making this an optional item. Specifically, (i) in many instances, the correction will be made in the form of a line item adjustment on a subsequent bill, and a breakdown is simply not available or necessary; (ii) the creation of a breakdown in a form that is useful to the customer can be time consuming and burdensome; and (iii) because in most cases where a billing issue covers multiple billing months we are in direct communication with the customer, many customers do not want or need a detailed breakdown with the corrected bill. While we are not opposed to providing the breakdown, we would only want to provide it if the customer requests it. NWNG suggests item (b) be revised as follows:</p> <p style="padding-left: 40px;">(b) <u>How to request</u> of a breakdown of the bill correction for each month included in the corrected bill;</p> <p>Third, with regard to item (e), NWNG suggests the following revisions:</p> <p style="padding-left: 40px;">The actions taken to <u>resolve the issue that resulted in</u> eliminate the cause of the bill correction, <u>if applicable</u>;</p> <p>Because the utility is not eliminating the bill correction but is eliminating the cause of the bill error, NWNG suggests rewording item (b) as shown above. The addition of “if applicable” at the end recognizes the fact that not all bill corrections require a corrective action by the utility.</p>	
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Residential and nonresidential service	PPL	PPL supports limiting the adjustment period for meter failures or malfunctions for residential customers to six months. However, PPL proposes a 36-month adjustment limitation for under-billing to nonresidential customers for meter failures or malfunctions. Residential metering is relatively simple to track and identify errors. The complexity of nonresidential metering can make it difficult to identify problems. In addition, nonresidential customer adjustments tend to include higher dollar adjustment amounts that should not be subsidized by residential customers.	Staff disagrees. The companies have failed to provide compelling reasons and evidence why nonresidential customers should be excluded from this rulemaking. In fact, the data shows the number of non-residential accounts billed in excess of six months is very small, and the total amounts billed on corrected bills to nonresidential customers in excess of six months is similar to the total amounts for residential customers. See attachment (page 36) for table showing company comparisons. The amounts reported for nonresidential customers are very small in comparison to the companies' total revenues, and the difference between the impact of corrected bills issued in excess of six months to non-residential customers and those issued to residential customers is not significant.
	PSE	<i>WAC 480-90-178(7)(c) and WAC 480-100-178(7)(c)</i> : PSE proposes to add a new subsection (c) that includes an exemption for non-residential meters from the provisions of section 5(a). The company argues that the exemption is necessary because utilities require flexibility to address the varying scenarios that occur with non-residential versus residential customer billing and metering. The varying nature of the non-residential customer class makes it difficult for the utility to identify slowed or stopped meters. For example, a business may operate seasonally, temporarily close, or not notify the utility of equipment or facility changes. Another rationale for exempting non-residential meters from these draft rules is the additional time and resources needed to address the unique and customized nature of larger meter sets. This is particularly prevalent with larger, non-residential natural gas meters for industrial customers. These customized meter sets require additional time to be designed, scheduled, etc. to ensure precise and accurate measurement.	
	NWNG	NWNG suggests that the six-month limitation regarding bill corrections be applicable only to residential customer bills. As such, we recommend that corrected bills related to non-residential customer bills be included as an exception under the proposed new section (7).	

Over-billing	PPL	PPL requests that the adjustment period for over-billing be the same as required for under-billings. However, should the commission determine that adjustments for over-billings should be treated differently, PPL proposes language that would not require a utility to issue corrected bills for over-billings beyond 36 months.	Staff disagrees. The Commission’s records retention policy is six years ¹ . The commission adopted by reference the Regulations to Govern the Preservation of Records of Electric, Gas, and Water Utilities published by the National Association of Regulatory Utility Commissioners (NARUC). Staff believes that the companies should be required to refund over-billings for the entire period of time for which they are required to keep records.
	NWNG	As proposed, the use of the word “collect” implies that the intent is to impose the six-month restriction only to under-billings. If that is Staff’s intent, then NWNG recommends that a limitation on over-billings also be established. If Staff finds that six months is too short, NWNG would recommend a 12-month limitation on refunds for over-billings. There is considerable administrative cost incurred in investigating and processing corrected bills, and an open-ended timeframe for processing over-billings would be administratively burdensome.	
Billing errors	PPL	PPL disagrees with staff’s recommended six-month adjustment period for under-billing related to billing errors. Billing errors can be related to issues that are difficult to capture in a process, such as the customer signing up for service at the wrong address, the meter base being labeled incorrectly, internal wiring issues, etc. Utilities should not be penalized when the source of the error is based on problems beyond the control of the utilities. The utilities previously proposed a 36-month limitation for all billing error adjustments.	Staff disagrees. The companies have submitted a comprehensive list of quality control measures to ensure that billing errors are caught in a timely manner. While there may be billing anomalies that occur infrequently, staff believes the companies are able to identify the majority of billing errors that occur within six months.
Definitions	PPL	PPL proposes changes to the definitions for clarity. PPL requests the removal of the term “erratic meter” from the definition of “meter failure or malfunction.” The company believes “meter failure or malfunction” is adequately defined without the term “erratic meter” included in the definition.	Staff disagrees. Staff investigations of informal complaints have found that there are instances when the meter shows erratic meter readings as it begins to fail.

¹ Docket A-131761

<p>Conflict with WAC 480-100-183</p>	<p>PPL</p>	<p>PPL believes the proposed rule also requires a revision to WAC 480-100-183(5). WAC 480-100-183(5)(a) requires utilities to refund or bill customers for the proper usage from the date that they first were billed for the malfunctioning meter, if the date is known. If the date is unknown, WAC 480-100-183(5)(b) limits the adjustment period to no more than six months.</p> <p>PPL proposed the following existing language in WAC 480-100-183(5) be deleted:</p> <p>(5)</p> <p>(a) If the utility can identify the date the customer was first billed from a defective meter, the utility must refund or bill the customer for the proper usage from that date:</p> <p>(b) If the utility cannot identify the date the customer was first billed from a defective meter, the utility must refund or bill the customer for the proper usage not to exceed six months.</p> <p>To eliminate confusion and to prevent having two conflicting rules depending on whether the utility initiated the investigation or the customer, PPL proposed replacing the language in WAC 480-100-183(5) as follows:</p> <p>(5) If a meter test reveals a meter error greater than specified as acceptable in WAC 480-100-338, Accuracy requirements for electric meters, the utility must repair or replace the meter at no cost to the customer. <u>In accordance with WAC 480-100-178(5)(a)</u>, the utility must adjust the bills to the customer based on the best information available to determine the appropriate charges. The utility must offer payment arrangements in accordance with WAC 480-100-138(2), Payment arrangements.</p>	<p>Staff believes the proposed rules clearly delineate the timeframes allowed for corrected bills. The proposed rules are not in conflict with WAC’s 480-90-183(5); 480-100-183(5).</p>
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Consistent treatment under WAC 480-100-128	PPL	<p>PPL believes there is a conflict with WAC 480-100-128(2)(f), which states the utility “must charge the customer for service used in accordance with the utility’s filed tariff” when it determines service has been used prior to receiving an application for service in the context of a possible disconnection. PPL proposed the following revision to WAC 480-128(2)(f):</p> <p>The utility has determined a customer has used service prior to applying for service. The utility must charge the customer for service used in accordance with WAC 480-100-178(5)(b).</p> <p>PPL proposes WAC 480-128(2)(f) be revised to state:</p> <p>The utility has determined a customer has used service prior to applying for service. The utility must charge the customer for service used in accordance with [remove: the utility’s filed tariff] <u>WAC 480-100-178(5)(b).</u></p>	Staff believes the proposed rules clearly delineate the timeframes allowed for corrected bills. The proposed rules are not in conflict with WAC’s 480-90-128(2)(f); and 480-100-128(2)(f).
	NWNG	<p>NWNG is also concerned that subjecting bill corrections for unassigned usage to the six-month limitation might be in conflict with WAC 480-90-128(2), which provides for disconnection of service without notice or without further notice, and states at (2)(f):</p> <p><i>“The utility has determined a customer has used service prior to applying for service. The utility must charge the customer for service used in accordance with the utility’s filed tariff.”</i></p>	
Need for System Changes and Training	PPL	<p>The company believes the final rules will require changes to current business practices and processes. The company requests staff consider the system changes and training that utilities may need to complete when determining the schedule for implementation of the final requirements in this preceding.</p>	PPL was the only company addressing a need for additional time for system changes and training. Staff believes the time for system changes and training would be minimal and should be addressed individually with each company.

Response to Staff Question 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.	PPL	<table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">Residential</th> <th colspan="2">Non Residential</th> </tr> <tr> <th>Accounts corrected more than 6 months</th> <th>Total amount billed in excess of 6 months</th> <th>Accounts corrected more than 6 months</th> <th>Total amount billed in excess of 6 months</th> </tr> </thead> <tbody> <tr> <td>2012</td> <td style="text-align: center;">4</td> <td style="text-align: right;">\$745.59</td> <td style="text-align: center;">0</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>2013</td> <td style="text-align: center;">2</td> <td style="text-align: right;">\$1,436.50</td> <td style="text-align: center;">0</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>2014</td> <td style="text-align: center;">1</td> <td style="text-align: right;">\$846.66</td> <td style="text-align: center;">2</td> <td style="text-align: right;">\$841.59</td> </tr> </tbody> </table> <p style="text-align: center;">Adjustments due to bankruptcy and charges/fees waived are not included.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Year</th> <th>Total Washington Revenue</th> </tr> </thead> <tbody> <tr> <td>2012</td> <td style="text-align: right;">\$302,511,323.12</td> </tr> <tr> <td>2013</td> <td style="text-align: right;">\$313,273,892.31</td> </tr> <tr> <td>2014</td> <td style="text-align: right;">\$319,351,198.18</td> </tr> </tbody> </table>				Year	Residential		Non Residential		Accounts corrected more than 6 months	Total amount billed in excess of 6 months	Accounts corrected more than 6 months	Total amount billed in excess of 6 months	2012	4	\$745.59	0	\$0.00	2013	2	\$1,436.50	0	\$0.00	2014	1	\$846.66	2	\$841.59	Year	Total Washington Revenue	2012	\$302,511,323.12	2013	\$313,273,892.31	2014	\$319,351,198.18
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Response to staff question 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	PPL	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="text-align: left;">Year</th> <th colspan="2" style="text-align: center;">Residential</th> <th colspan="2" style="text-align: center;">Non Residential</th> </tr> <tr> <th style="text-align: center;">Accounts corrected more than 6 months</th> <th style="text-align: center;">Total amount billed in excess of 6 months</th> <th style="text-align: center;">Accounts corrected more than 6 months</th> <th style="text-align: center;">Total amount billed in excess of 6 months</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">2012</td> <td style="text-align: center;">4</td> <td style="text-align: right;">\$745.59</td> <td style="text-align: center;">0</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td style="text-align: center;">2013</td> <td style="text-align: center;">2</td> <td style="text-align: right;">\$1,436.50</td> <td style="text-align: center;">0</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td style="text-align: center;">2014</td> <td style="text-align: center;">1</td> <td style="text-align: right;">\$846.66</td> <td style="text-align: center;">2</td> <td style="text-align: right;">\$841.59</td> </tr> </tbody> </table> <p style="text-align: center;">Adjustments due to bankruptcy and charges/fees waived are not included.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left;">Year</th> <th style="text-align: left;">Total Washington Revenue</th> </tr> <tr> <td style="text-align: center;">2012</td> <td style="text-align: right;">\$302,511,323.12</td> </tr> <tr> <td style="text-align: center;">2013</td> <td style="text-align: right;">\$313,273,892.31</td> </tr> <tr> <td style="text-align: center;">2014</td> <td style="text-align: right;">\$319,351,198.18</td> </tr> </table>	Year	Residential		Non Residential		Accounts corrected more than 6 months	Total amount billed in excess of 6 months	Accounts corrected more than 6 months	Total amount billed in excess of 6 months	2012	4	\$745.59	0	\$0.00	2013	2	\$1,436.50	0	\$0.00	2014	1	\$846.66	2	\$841.59	Year	Total Washington Revenue	2012	\$302,511,323.12	2013	\$313,273,892.31	2014	\$319,351,198.18				The data shows the revenue impact of restricting the corrected bills for nonresidential customers to be very small.
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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	Avista	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Year</th> <th style="width: 20%;">Residential</th> <th style="width: 20%;">Non Residential</th> </tr> <tr> <td></td> <td style="text-align: center;"> Number of accounts issued corrected bills exceeding six months </td> <td style="text-align: center;"> Total amount billed in excess of six months* </td> </tr> </thead> <tbody> <tr> <td style="text-align: center;">2012</td> <td style="text-align: center;">0</td> <td style="text-align: center;">\$0</td> </tr> <tr> <td style="text-align: center;">2013</td> <td style="text-align: center;">1</td> <td style="text-align: center;">\$2,137</td> </tr> <tr> <td style="text-align: center;">2014</td> <td style="text-align: center;">0</td> <td style="text-align: center;">\$0</td> </tr> </tbody> </table>	Year	Residential	Non Residential		Number of accounts issued corrected bills exceeding six months	Total amount billed in excess of six months*	2012	0	\$0	2013	1	\$2,137	2014	0	\$0	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Year</th> <th style="width: 20%;">Total Revenue</th> </tr> <tr> <td></td> <td style="text-align: center;"> Company's total revenue </td> </tr> </thead> <tbody> <tr> <td style="text-align: center;">2012</td> <td style="text-align: center;">\$625,675,220</td> </tr> <tr> <td style="text-align: center;">2013</td> <td style="text-align: center;">\$651,307,499</td> </tr> <tr> <td style="text-align: center;">2014</td> <td style="text-align: center;">\$675,386,929</td> </tr> </tbody> </table>	Year	Total Revenue		Company's total revenue	2012	\$625,675,220	2013	\$651,307,499	2014	\$675,386,929	
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	PSE	<p>PSE’s meter and billing correction tracking system specifically tracks billing corrections related to stopped meter and UEU problems. The system does not include an “other billing errors” category.</p>																											
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CORRECTED BILLING ISSUES RULEMAKING
DOCKET U-144155
COMMENT SUMMARY – OCTOBER 2015

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	CNGC	Same response as question number 1.																													
Response to staff question 3: The	PPL	<p>a. Please provide additional rationale and examples of why it is important to exclude non-residential customers. Pacific Power supports excluding nonresidential customers from the six-month limitation for adjustments for meter failures or</p>	Staff believes the companies have not shown a compelling reason for excluding nonresidential customers from the six month billing correction limitation.																												

rationale for requesting the exclusion of non-residential customers from the six month billing correction limitations is unclear.

malfunctions. It can be difficult to identify when a meter error or billing error occurs for nonresidential customers. The following are some examples of metering or billing errors that could occur with nonresidential customers that may go undetected by the utility:

- The meter stops during a period of curtailment or shut down and the customer does not notify the utility when normal operations resume.
- The customer modifies their facilities, requiring different metering equipment to properly measure and bill their usage, but does not notify the utility of the change.

In response to Staff’s concerns, Pacific Power is proposing in these comments a billing adjustment limitation for nonresidential customers.

b. 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.

	Seasonal Customer	Total Revenue	
	Number of accounts issued corrected bills exceeding six months	Total amount billed in excess of six months	Seasonal Customer Revenue
Year			
2012	2	\$92.00	\$12,429,049.14
2013	2	-\$626.94	\$12,823,928.67
2014	5	-\$69.14	\$14,161,537.96

Only schedule 40 customers are included. These customers are also included in other responses herein.

Avista agreed that the rule should be applied to both residential and nonresidential customers.

		<p>While seasonal nonresidential customers primarily use electric service during the “irrigation season”, the irrigation season varies for each customer. Factors such as the type of crop being grown, weather conditions, crop rotations, etc. can all affect when a customer starts and stops their irrigation season for the year. This variation can make it difficult to identify a meter failure or malfunction. For example, if the meter starts to slow or stops in the fall when irrigation seasons typically end, it may look no different than the seasonal nonresidential customer slowing down operations for the season. It would be cost prohibitive for the utility to send an employee out at the end of the irrigation season to verify whether the meter has failed or the seasonal nonresidential customer has simply stopped irrigating for the season. Additionally, access to meters can be an issue which prevents utilities from being able to resolve meter or billing issues promptly.</p> <p>Unassigned usage can also be difficult to address with seasonal nonresidential customers. If a new customer takes over the service at the end of the irrigation season but does not apply for service, they could have minimal usage during the off season. The usage may be so low that it does not prompt an investigation of the unassigned usage. It could be over six months before the seasonal nonresidential customer begins to irrigate, prompting the utility to investigate.</p>	
	Avista	<p>Avista believes the draft rules, as written, should apply to residential and non- residential customers. Typically, the terms that describe commercial customers are in reference to the rate schedule a customer is being billed for service. For example, “small business customer” or “commercial customer” refers generally to Avista’s Schedule 11, General Service customer. “Large Commercial Customer” generally refers to Avista’s Schedule 21, Large General Service customer and “Industrial Customer” generally refers to Avista’s Schedule 25, Extra Large General Service</p>	

		<p>customer. Avista is not able to separate seasonal commercial customers from all commercial customers, thus we are unable to provide the data requested.</p>													
	PSE	<p>PSE stated it is extremely difficult to distinguish whether changes in usage patterns are due to a business’s operational changes or a slowed/ stopped meter. In addition, non-residential customer billing adjustments represent a much higher billing amount (on average) than residential. The data in PSE’s response to question #4 below demonstrates this higher amount. In 2012, for example, the total average non-residential amount was \$2,414 versus \$248 for residential. In 2013, the total average non-residential amount was \$4,481 versus \$179 for residential. In 2014, the total average non-residential amount was \$362 versus \$56 for residential. Utilities need flexibility to address the causes of usage pattern changes for non-residential customers and to ensure the larger average amounts are fully addressed. Finally, another rationale for excluding non-residential meters is the additional time and resources needed to address the unique and customized nature of larger meter sets. This is particularly prevalent with larger, non-residential natural gas meters for industrial customers. These customized meter sets require additional time to be designed, scheduled, etc. to ensure precise and accurate measurement.</p> <table border="1" data-bbox="674 1045 1392 1398"> <thead> <tr> <th data-bbox="674 1045 803 1122">Year</th> <th colspan="2" data-bbox="803 1045 1212 1122">Seasonal Commercial Customers</th> <th data-bbox="1212 1045 1392 1122">Total Revenue</th> </tr> <tr> <td data-bbox="674 1122 803 1360"></td> <td data-bbox="803 1122 1005 1360">Number of accounts issued corrected bills exceeding six months</td> <td data-bbox="1005 1122 1212 1360">Total amount billed in excess of six months</td> <td data-bbox="1212 1122 1392 1360">Seasonal customer revenue</td> </tr> </thead> <tbody> <tr> <td data-bbox="674 1360 803 1398">2012</td> <td data-bbox="803 1360 1005 1398">3</td> <td data-bbox="1005 1360 1212 1398">\$13,630</td> <td data-bbox="1212 1360 1392 1398">n/a</td> </tr> </tbody> </table>	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	3	\$13,630	n/a	
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	3	\$13,630	n/a												

		2013	4	\$16,592	n/a		
		2014	4	\$18,318	n/a		
	NWNG	<p>There are a number of reasons to exclude non-residential customers from the six month billing correction limitation. These reasons include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> (1) The dollar amounts associated with meter failures or malfunctions tend to be much larger than is experienced with residential customers. For example, see the Company’s response to question two above, where two non-residential accounts resulted in more than \$147,000 that would have been written off if the six month rule had been in effect. Large write-offs like this ultimately serve to increase rates to other customers. (2) The non-residential meter set configurations can be complex with more components than the typical residential meter set. The more complex the meter set configuration, the more difficult it is to detect meter failures. As such, a malfunction could exist for longer periods of time without being detected. Once detected, the result could be under- or over-billings that are much larger than would ever be experienced in the residential customer class. (3) Many non-residential customers tend to have varying production schedules throughout the year, often with periods of extremely high and extremely low usage. This variability in usage makes it even more difficult to determine if in any given period the usage increase or decrease is the result of a meter failure or malfunction. <p>There were no seasonal customer accounts that were issued corrected bills that exceeded six months of usage. NWNG does not separately track revenues associated with seasonal customer use.</p>					

		<p>Any seasonal use customer, whether residential or non-residential, pose a problem in the Company’s ability to quickly identify a meter malfunction or failure. This is largely due to the fact that these customers could go several months – maybe even an entire 12 consecutive month period or more – with zero use. For the most part, these are customers that use natural gas only for space heating purposes. In the non-residential sector, this is often associated with freeze protection.</p> <p>It would not be prudent for the Company to assume that extended consecutive zero use reads (e.g. six months or more) is merely the result of the customer’s behavior. As such, NW Natural’s policy is to initiate an account review or meter investigation on zero-use meters where six months of consecutive zero use has been recorded. It would be unduly burdensome and costly for the Company to perform these investigations more frequently because in general, the zero use meter read is not attributable to a meter failure or malfunction.</p>	
	CNGC	<p>Errors with residential bills are more easily detected than errors with nonresidential bills because residential customers typically have an easily identifiable and fairly consistent annual load curve. A residential customer may have a fairly constant baseline load from a water heater and a more substantial heating load that increases as the weather gets cooler. Gas drier usage and stovetops do not use enough gas to create significant deviations in the residential load profile.</p> <p>By contrast, non-residential customers do not have a typical load profile. A non-residential customer may use gas for heating or for an industrial process. Adding or subtracting working hours or production runs could significantly change a non-residential customer’s usage. Nonresidential customers’ usage responds to economic and market</p>	

		<p>factors specific to that customer and not only weather. Because they may have atypical usage patterns when compared with either their own historic use or to other non-residential customer, detecting metering or billing errors through exception reporting is much more difficult.</p> <p>The term “seasonal” is not used in the company’s tariff but is used conversationally to refer to spikes in usage that are experienced during certain times of the year. For instance, wineries and other agricultural customers may have seasonal spikes in demand, but these spikes vary from year-to-year based on a number of factors such as the crop being grown and the crop yield.</p> <p>The company does not have a way to retrieve the requested data from its billing system.</p>																								
<p>Response to staff question 4: Please provide the most recent three years of data for corrected bills related to overbilling.</p>	PPL		Residential		Non Residential																					
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2012	24	(\$9,351)	5	(\$5,064)																						
						Staff acknowledges the additional information.																				

CORRECTED BILLING ISSUES RULEMAKING
DOCKET U-144155
COMMENT SUMMARY – OCTOBER 2015

		2013	27	(\$7,171)	1	(\$3,444)
		2014	62	(\$3,479)	10	(\$18,058)
PSE	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	13	-\$3,226	3	-\$7,242	
	2013	30	-\$5,363	1	-\$4,481	
	2014	33	-\$1,861	13	-\$4,704	
NWN	Year	Residential		Non Residential		
		# of accounts with corrected bill exceeding 6 months	Total amount of refunds in excess of 6 months	# of accounts with corrected bill exceeding 6 months	Total amount of refunds in excess of 6 months	
	2012	1	\$ 62	3	\$ 181	
	2013	8	\$ 287	3	\$ 326	
	2014	6	\$ 231	4	\$ 501	
CNGC	Because the company does not track over-billed reads with a unique field order type, the company does not have a system record of the number of occurrences, the reason for the occurrences, or the results of the investigations for such billing anomalies.					

<p>Response to staff question 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.</p>	<p>PPL</p>	<p><u>Identifying and Preventing Billing Errors</u></p> <p>The Company has several automated and manual processes that analyze billing and metering information to help prevent billing errors. Several of these processes are described below.</p> <p>Suspends Process The Company’s automated “suspends process” assists in identifying many potential billing errors including, but not limited to, misread meters, rate schedule errors, meter register inconsistencies and meter failures. There are currently over 50 different types of automated billing suspends that require a billing agent complete an electronic review of the bill prior to the statement being sent to the customer. Suspends may result in re-reads, meter site visits/exchanges or a telephone call to the customer to gather/clarify information before the statement is sent.</p> <p>System Edits The Company’s billing system has a number of built-in system edits that prevent incorrect meter installations based on the specific meter type being installed, including phase, billing multiplier, current/voltage transformer ratios, service profile, meter asset status, communication type, etc. These edits prevent errors from occurring during the initial setup and exchange of meters in the system.</p> <p>Verify Service Information (VSI) Process When an instrument-rated metering installation is initially installed, rewired, tested or a meter is exchanged, a verification service information (VSI) procedure is followed to ensure billing errors are avoided. The VSI process includes a full inspection of the installation, a review of</p>	<p>The companies have reported extensive quality control processes that analyze billing and metering information to help prevent billing errors.</p> <p>Staff believes that some additional refinements in the companies’ procedures could further reduce billing errors. This would include increased customer education and communication.</p>
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		<p>billing determinants, meter characteristics and voltage/current testing.</p> <p>Validation One-Line Team (VOLT) Process (Installations Over 1 MW) The Company follows a VOLT procedure that tracks the installation of any single meter measuring over 1 MW of load. The VOLT process is a cross-functional team audit with participants from the meter engineering, billing, account management and contract groups. The VOLT audit is performed prior to the first statement being sent to the customer to prevent any errors in the initial setup of an account. This procedure may also be implemented whenever significant changes occur at the site.</p> <p>Verification Reports Monthly or daily reports are reviewed to determine if customers are being billed on the correct rate schedule.</p> <ul style="list-style-type: none">• New customer BPA review• Separately metered new services (barn, garage, shop) BPA qualification review• Non-residential account type billing on residential rate schedule• New irrigation rate schedule account review• Missing or mis-matched data on the load screen review (indicator of possible incorrect rate schedule) <p>Quality Monitoring The Company's call centers monitor random customer calls and agent back-office work for quality and accuracy when customers apply for service. If an agent incorrectly sets up a customer's account or selects an incorrect rate schedule, the</p>	
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		<p>error is corrected and additional training is provided to the agent.</p> <p><u>Preventing Mislabeled Meter Bases</u> Accurate labeling of meter bases is the customer’s responsibility (WA Rule 8A). The company does everything it can to ensure customers are aware of this responsibility, including publishing guidelines in the Company’s Electric Service Requirements (ESR) booklet, which is available online at www.pacificpower.net/esr. Labeling of meter bases is addressed in the following sections of the Company’s ESR:</p> <ul style="list-style-type: none"> • 7.7.3, requirement 10 • 7.8.3, requirement 7 • 10.6, requirement 1 <p>The Company also has a “Multi-Meter Verification Process” for business accounts. When multiple meters are installed on a single business structure, such as a strip mall or individually metered business offices in a complex, a letter is sent to the initial customer that signs up for service to remind them to verify the meter information at the site is correctly reflected on their bill.</p>	
	Avista	<p>Avista has many procedures in place to prevent and identify billing errors from occurring. From a system perspective, meter installs, changes, or removals are primarily completed through the Company’s Mobile Dispatch System. With this application we are able to set validation rules to ensure data integrity. These rules help in preventing errors from being</p>	

		<p>entered in the system and to ensure that the proper equipment is being installed in the field. In addition, some of the specific procedures in place to prevent and identify billing errors are as follows:</p> <ul style="list-style-type: none">• Incorrect prorated bills – Avista’s Customer Care & Billing system has built in functionality for the automated proration of bills. This functionality insures that bills are prorated correctly.• Mislabeled meter bases – Avista requires all meter sockets in multi-unit dwellings with separate meters to be labeled. Avista will not install any meters at multi-metered facilities until each individual meter is properly labeled and each circuit is physically verified jointly by the installing electrician and Avista’s meter installer. The building owner is responsible for the proper identification of electric and natural gas meters, which includes making sure the building number/letter matches what was provided during the joint verification. In addition, for natural gas meters, each type meter is physically different from one another and labeled from the manufacturer with the meter size and model. When installing a natural gas meter, the meter installation field order will specify the size of meter required to properly serve the customer.• Incorrectly installed meters - Only Avista-owned metering equipment will be used to provide billing information. Avista uses Journeyman meter technicians who have completed three years of meter specific training to install meters. Each technician works with electricians and Customer Project Coordinators to provide the proper metering given the specific installation. When natural gas meters are installed, the natural gas service person verifies the piping and meter are level and plumb to ensure proper	
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		<p>operation of the meter. Additionally, the pressure regulator setting is verified under both flowing and non-flowing conditions (actual values are entered into the meter installation field order). Lastly, the test hands on the natural gas meter index are visually checked to ensure they show natural gas usage before completing the meter installation field order.</p> <ul style="list-style-type: none">• Incorrect billing rate schedules - For new installations, the rate schedule is entered by the employee in the office who creates the new premise (meter location) and field order. The meter technician reviews the billing rate schedule to make sure it is appropriate.• Incorrect billing multipliers – For electric meters, the billing multiplier is determined by the meter technician who installs the meter based on the installation. The multiplier is written on the meter and is also documented as part of the field order completion. In the field order, the meter multiplier entered must be “1” if there are no Current Transformers (CTs) present or the order will not be allowed to be completed. If there are CTs present, the multiplier must match the CT ratio before the order can be completed. These verifications prevent field technicians from making mistakes while entering the multipliers. For natural gas meters, the meter multiplier is programmed by the meter manufacturer. Avista randomly samples new batches of meter orders when they are received from the manufacturer to ensure they are properly programmed. Avista also verifies the meter multiplier is correct in the field when performing certain types of work on gas meters already installed.	
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	PSE	<p><i>WAC 480-90-178(5)(c) and WAC 480-100-178(5)(c)</i>: PSE proposes to eliminate this section from the draft rules because there are existing rules that establish requirements for utilities to develop and maintain procedures for meter testing, repairing and replacement of meters. It is unclear to PSE the value in requiring utilities to file a “plan” and provide ongoing updates for identifying and repairing meters to have on file at the Commission. The Commission can already request such information from utilities on its billing and metering procedures at any time, and therefore an additional requirement to file a “plan” is duplicative, burdensome and does not belong in the final rule. It is unclear what value will be gained by adding an additional administrative filing.</p>	<p>Staff disagrees the reporting requirements of the proposed rules in WAC 480-90-178(5)(c) and WAC 480-100-178(5)(c) are overly burdensome. Staff believes the one-time initial report with updates as necessary would be helpful for the following reasons: (1) It serves as a frame of reference when reviewing the companies’ procedures; and (2) The plans can be helpful in comparing best practices of the regulated companies.</p>
	NWNG	<p>Section (5)(c). NWNG is fundamentally opposed to the inclusion of this new section in this rule as it is currently proposed. Our concerns are set forth below:</p> <p>First, the requirements for identifying, repairing or replacing meters that are not functioning correctly are already governed by other rules – specifically WAC 480-90-343 and WAC 480-90-183. These rules have been in effect for many years, and as a result the Company has tariff provisions and associated well established procedures in place for ensuring compliance with these rules. Incorporating a seemingly new requirement in this rule serves only to create an unnecessary duplication of effort, and may ultimately only create potential conflict and confusion.</p> <p>Second, NWNG is concerned with Staff’s proposed requirement that a utility file its procedural document with the Commission. This new language imposes an unnecessary degree of oversight that seems to result in little more than the micro-management of utility practices. The additional reporting requirement proposed by Staff serves to add unnecessary administration for both the utilities and</p>	

		<p>for the Commission, given that the Commission Staff may, at any time, invoke the right to request a copy of the utility's procedures and practices should a concern arise. In short, the proposed requirement to file a procedure, and any updates to such procedure, with the Commission is potentially onerous and of questionable value.</p> <p>NWNG suggests that the proposed draft rule language in this section be deleted in the entirety, and that this section be revised as follows:</p> <p><u>A utility must develop and maintain procedures describing its practices regarding the issuance of corrected bills that result from (a) meter failure or malfunction; (b) unassigned meter usage; and (c) other billing errors, as defined in this rule, not later than May 1, 2016.</u></p> <p><u>The utility must submit a copy of such procedures to the Commission within ten (10) business days of receiving a request.</u></p> <p>In further comment, NWNG would not be opposed to incorporating language in its tariff that would generally describe its practices regarding the issuance of corrected bills as a means to comply with this new section of the rule.</p> <p>NWNG utilizes the following procedures to prevent / identify billing errors:</p> <p>a. <u>Incorrect prorated bills:</u> When there is a change in rates, the new billing rates are entered into the Company's Customer Information System (CIS) in a test environment where test bills for each rate schedule are generated and reviewed. Once tested and the bill calculation accuracy is verified, the test site is</p>	
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		<p>systematically moved to production (rather than re-entering values into production). Once moved to production, a sample of production bills is reviewed to again verify the rates and proration are calculating accurately. In addition, the Company's Account Services Department randomly samples bills on a weekly basis to review and verify the accuracy of all aspects of the bill.</p> <p>b. <u>Mislabeled meter bases</u>: For purposes of this response, NWNG assumes this item is in reference to a situation that we refer to as "crossed-meters" where the meters have been mislabeled, usually by a building contractor. To mitigate crossed-meter situations from occurring, the Company's field services team does the following:</p> <p>When a meter is set by a Company contractor, a NWNG Quality Assurance (QA) inspector will verify the physical meter number at the premise matches the meter number entered into the as-built paper report completed by the installation crew.</p> <p>When a meter is set by Company personnel, a NWNG QA inspector will verify that the meter number at the premise matches the electronic order issued by the Company's P-CAD system.</p> <p>Once verified, the meter numbers are entered into the CIS to activate the customer account.</p> <p>c. <u>Incorrectly installed meters</u>: The Company uses a variety of methods to help mitigate the occurrence of meter installation errors. These include:</p>	
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		<ul style="list-style-type: none"> • Meters come from the manufacturer with the Automated Meter Reading (AMR) device installed. The Company sample tests the devices upon arrival to confirm proper registration. • Any meter set (or meter change) order must pass certain predefined conditions. If the conditions are not met, the meter order is elevated for additional review. The conditions that would cause a meter order to escalate include: <ul style="list-style-type: none"> i. Meter pressure of old meter does not match newly installed meter. ii. Number of index digits does not match meter profile. iii. Meter number not eligible for install • If a meter fails to transmit a meter read for two consecutive months, a meter inspection order is automatically generated and investigated by field services. • At the time an account bills, the CIS bill logic auto checks for certain conditions. If the condition is not valid, a bill exception will be created and a billing clerk must review / resolve the condition before the bill will be released. Such conditions include: <ul style="list-style-type: none"> i. Meter pressure error (MTRPR) ii. Meter temperature compensation error (MTRTM) iii. Meter multiplier error (MLTPR) iv. Low / high use (various) v. No use (ZUSE) <p>d. <u>Incorrect billing rate schedules</u>: As new premises are initialized into the system, a NWNNG representative determines whether the account is residential or non-residential. The customer class associated with the rate schedule must match the customer class</p>	
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		<p>designated on the account. For example, residential Rate Schedule 2 cannot be selected if the customer class designation is commercial.</p> <p>As customer turnover occurs on an existing premise, the Customer Contact Center (CCC) representative (CSR) queries the customer to determine whether the existing rate schedule assignment is the appropriate rate schedule for service to the new customer. For residential and small commercial accounts there is just one rate schedule option for each (Schedule 2 for residential and Schedule 3 for commercial).</p> <p>Larger use non-residential customers (typically where usage is expected to be more than 2,000 therms per month) are handled by the Major Account Services Department as there are multiple rate options available. These customers are required to sign an election form to document which rate option they desire to be placed on. Clerk entry of these rate schedule elections is reviewed by a second individual to confirm that the account is properly set-up.</p> <p>At the time an account bills, a bill exception will be created if certain conditions exist. A billing clerk must review / resolve the condition before the bill can be released. Such conditions include:</p> <ul style="list-style-type: none">• Rate schedule not valid for state (RSWS)• Rate schedule not effective during billing period (RSCH)• Rate schedule requires contract but contract not found (CRRS)• Rate schedule does not agree with contract record (RSMM)	
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		<p>e. <u>Incorrect billing multipliers:</u> Meters are grouped by families as they are purchased and each family is assigned one meter multiplier value. This value follows the meter except where there is a need to change the meter multiplier, such as when certain attachments are added to the meter set.</p> <p>Each time an account bills, there is system logic in CIS to confirm that the meter multiplier associated with the meter agrees with an algorithmic formula. A bill exception stops any bill that fails this logic and must be reviewed / corrected by a billing clerk.</p>	
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	CNGC	<p>The company has the following processes and procedures for preventing and identifying billing errors:</p> <ol style="list-style-type: none"> a. Exception Reporting: A daily report listing abnormally high or low reads is automatically generated when a read is 90% lower or higher than the expected bandwidth of normal usage. Expected usage is 0.4 to 2.5 times estimated usage based on the demand at the premise for the prior three years. This report notifies the company of any dead meter, including meters that are functional but have no usage, and meters registering usage where there is no customer of record. The report is manually reviewed and anomalies are investigated. <ul style="list-style-type: none"> • The investigation may be a manual review of that customer’s historical usage or it may be a physical check of the meter. The analyst reviewing the report determines the necessary action for the bill in question. b. Unidentified usage: When unidentified energy usage is discovered through exception reporting, the company places a door hanger on the premise asking the occupant to establish service with 48 hours. If service is not established within that timeframe, the service is disconnected. c. Meter testing: In compliance with WAC 480-90-248 and rule 7 of the company’s tariff, the company systematically and repeatedly tests a statistical sample of its meters for compliance to the 2% tolerance established in WAC 480-90-338. d. Testing new rates: When new rates are entered into the customer billing system, they are entered into a test environment and are verified before they are transferred live to the billing system. e. Estimated bills: When bills are estimated, the company follows the procedure of using the usage patterns for the same timeframe for the prior three years. 	
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Appendix showing table mentioned in staff response to company comments (page 7) regarding residential and nonresidential service.

The amounts reported for nonresidential customers are very small in comparison to the companies' total revenues, and the Difference between the impact of corrected bills issued in excess of six months to non-residential customers and those issued To residential customers is not significant.

	Non-residential			Residential			Average annual revenue
	Number of accounts billed in excess of 6 months (2012-2014)	Average annual total amount billed in excess of 6 months (2012-2014)	Percent of average annual revenue	Number of accounts billed in excess of 6 months (2012-2014)	Average annual total amount billed in excess of 6 months (2012-2014)	Percent of average annual revenue	
Avista	8	\$12,944	0.002%	18	\$3,115	0.000%	\$650,789,883
PSE	267	\$467,684	0.015%	1,541	\$406,967	0.013%	\$3,184,100,333
NWNG	3	\$49,037	0.068%	4	\$51	0.000%	\$71,836,882
PPL	2	\$280	0.000%	7	\$1,010	0.000%	\$311,712,138
CNGC	Not reported	Not reported		Not reported	Not reported		