


Seattle Public Utilities - Policy & Procedures

Subject: Wholesale Water Customer Metering & Billing Dispute Policy & Procedures		Number: SPU-WCM-001
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1.0 OBJECTIVE

To outline a systematic approach for documenting, processing and resolving wholesale water customer metering and billing complaints and disputes.

2.0 ORGANIZATIONS AFFECTED

Seattle wholesale water customers
Seattle Public Utilities

3.0 REFERENCES

- 3.1 Individual Wholesale Water Supply Contracts
- 3.2 RCW 43.20.240 Public water systems -- Complaint process
- 3.3 RCW 80.28 Published rates to be charged
- 3.4 Seattle Municipal Code 21.04 as amended governing billing for water services
- 3.5 SPU Policy Standard and Administrative Charges Rule
- 3.6 SPU Strategic Business Plan

4.0 POLICY

- 4.1 Seattle Public Utilities will follow a standard procedure or protocol for documenting, processing and resolving wholesale water customer metering and billing disputes.
- 4.2 If any component of this policy conflicts with any applicable contractual agreement, the contractual agreement shall prevail. The remaining non-conflicting features of this policy shall remain in effect.

5.0 DEFINITIONS

For purposes of this policy, the following definitions apply:

- 5.1 Complaint - An expression of wholesale water customer dissatisfaction. A complaint is identified as "Step 1 in the Complaint/Dispute Resolution Process."
- 5.2 Dispute - Defined as a complaint that can not be resolved to the mutual satisfaction of both the customer and SPU at Step 1 in the process. To become a dispute a wholesale customer must submit in writing the specific nature of the dispute and it must be received within the 60-day payment period.
- 5.3 Executive Review – The SPU Executive Director and his/her designated support staff, including: the Wholesale Contracts Manager, Division Directors and the Executive Branch Director.
- 5.4 SPU Wholesale Billing Representative - The individual responsible for the customer accounting, billing and receivables for the wholesale water customer, usually the initial point of contact for billing issues.
- 5.5 SPU Wholesale Meter Representative - The individual responsible for the management, installation and maintenance of water meters serving the wholesale customer. Usually the initial point of contact for meter issues.
- 5.6 SPU Wholesale Customer Metering and Billing Dispute Team – The staff identified by the Wholesale Contracts Manager as responsible for ensuring the provisions of this policy are followed for any specific dispute.
- 5.7 Wholesale Water Customer - A customer who receives water from Seattle for the purposes of reselling water to its retail customers.
- 5.8 60-Day Payment Period – The period of time between the date the billing statement is printed and mailed to the customer and the bill due date as noted on the Billing Summary Sheet, as provided to the wholesale water customer.

6.0 RESPONSIBILITIES

- 6.1 SPU is responsible for:
 - Professional, courteous, timely investigation and response to billing and metering complaints and disputes;
 - Uniform and consistent application of billing and metering policy and procedures;
 - Acknowledging receipt of a complaint or dispute within 3 business days, and;
 - Verifying that each wholesale customer is informed about the procedures in this policy.
- 6.2 Wholesale water customers are responsible for:

- Notifying SPU metering and billing staff with complaints and disputes as quickly as possible, and at the minimum providing written notification with the specific nature of the dispute within the 60-day payment period;
- Providing all available information to SPU, whether written or verbal, that was used as a basis for the complaint;
- Paying the undisputed portion of the charges; and
- If a meter is tested per a request from the customer and the meter tests accurate, in accordance with AWWA standards, then the customer is responsible for the cost of the test.

7.0 COMPLAINT/DISPUTE RESOLUTION PROCESS

SPU wholesale water customers who have questions, complaints, dispute charges, or otherwise question utility actions reflected on SPU bills for water consumption are entitled to have their concerns heard and responded to. Seattle Public Utilities has a progressive complaint/dispute process consisting of the following steps:

7.1 SPU Review/Response

7.1.1 STEP 1. Informal Conference

Wholesale water customers may contact an SPU wholesale billing representative or an SPU metering representative, as appropriate to the concern. In many cases, questions or complaints will be addressed and resolved by the representative at the time of the call, or soon thereafter. If the representative is unable to resolve the customer's concerns, the wholesale customer may proceed to the next level of review.

7.1.2 STEP 2. SPU Manager Review

Wholesale water customers who are dissatisfied with SPU's response to an informal conference may ask for a Manager's Review. In some cases, the direct SPU Billing Manager, Meter Manager or the Wholesale Contracts Lead may resolve the issue. In other cases another SPU manager may be asked to review the information pertaining to the dispute. As part of this review the wholesale customer must provide written notification with the specific nature of the dispute within the 60-day payment period. In all cases, the Wholesale Contracts Manager will be notified, and if appropriate, assign the lead in resolving the dispute.

STEP 3. SPU Executive Review

Wholesale water customers who continue to be dissatisfied with SPU's response in STEPS 1 and 2 above, may ask for an

Executive Review. Step 3 includes a review by a member or members of SPU's Executive Team. A proposed solution is to be developed at the conclusion of Step 3.

STEP 4. Dispute Resolution Process in Supply Contracts
If a dispute remains unresolved after Steps 1 through 3 have been pursued, the wholesale water customer and SPU have the option to pursue the dispute resolution procedures detailed in the individual wholesale customer's water supply contract.

8.0 PROGRAM REVIEW

Periodic review of this policy shall be performed by the SPU Customer Service Branch as changes or conditions warrant in order to ensure that it remains current.

9.0 PROCEDURES

Procedures for documenting, processing and resolving complaints and disputes shall be contained in the Wholesale Water Customer Metering & Billing Complaint and Dispute Procedure Manual.

Wholesale Water Customer

**Metering and Billing
Complaint and Dispute**

PROCEDURE MANUAL

January 1, 2006

Seattle Public Utilities
Wholesale Water Customer
Metering & Billing
Complaint and Dispute Procedure Manual

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Seattle Public Utilities
WHOLESALE WATER CUSTOMER
Metering & Billing
Complaint and Dispute Procedure Manual

January 1, 2006

1.0 PURPOSE & SCOPE

The purpose of this procedure is to help provide all employees of Seattle Public Utilities (SPU) with quick and effective assistance in documenting, processing and resolving complaints and disputes related to billing and metering issues for SPU's wholesale water customers.

This procedure also provides detailed requirements, employee responsibilities and specific tasks, which must be performed to comply with this procedure. In addition, it is designed to meet the intent of Washington Administrative Code (WAC) requirements and AWWA (American Water Works Association) standards.

This procedure shall apply to all SPU wholesale water customers and be followed by all SPU employees. If any component of this procedure conflicts with any applicable contractual agreement, the contractual agreement shall prevail.

2.0 RESPONSIBILITIES

Executive Management (Department Director, Branch Executives, Division Directors):

Oversee implementation of these procedures in the utility, branch and division, as appropriate, including providing adequate support for implementing them.

Wholesale Contracts Manager (WCM):

Mobilize resources in resolving disputes, keep Executive Management apprised of the investigation and assign a lead to resolve disputes under the provisions of this procedure.

- Identify the appropriate lead to investigate the dispute, maintain a record of interactions and communicate this information to Wholesale Service Request Committee (WSRC) members;
- Discuss the results of the meter/billing complaint or dispute with key staff and develop an approach to communicate results and next steps with wholesale customers;

- Coordinate progress, identify risks/benefits and communicate findings and other pertinent information to key SPU staff if dispute remains unresolved;
- For disputes involving complex issues, or a significant payment to the wholesale customer, obtain Executive Management's support for staff recommendations; and
- Help inform SPU employees that work with wholesale customers about these procedures.

Billing and Metering Management:

Assist the Billing Representative, Metering Representative or Wholesale Contracts Lead in resolving disputes quickly, informing the Wholesale Contracts Manager of issues and resolving the dispute.

- Provide or arrange for any required training for any employees under their supervision who may need training in the use of billing or metering tools such as BANNER, CIDS, MAXIMO, or process tools.

Billing, Metering or Wholesale Contracts Leads:

Lead the investigation of a complaint or dispute. In many cases, questions, complaints and disputes will be addressed and resolved by the Billing Representative, Metering Representative or Wholesale Contracts Lead at the time of the initial call, or soon thereafter. The Wholesale Contracts lead will be identified by the Wholesale Contracts Manager to own and resolve the issue.

- Be familiar with these procedures;
- For complaints and disputes that are easily addressed proceed quickly to resolution, based on management's direction;
- Discuss the results of the initial meter/billing investigation with the Wholesale Contracts Manager, or his/her designee, and key SPU staff to develop an approach to communicate results and next steps with wholesale customers;
- Inform SPU Management, as appropriate, and the Wholesale Service Request Committee (WSRC) members as issues arise;
- Document and track written correspondence and oral conversations regarding the issue, including any information the wholesale customer may have which supports their claim;
- Discuss with the wholesale customer if operations have changed which might account for the discrepancy;
- Determine if further investigation is needed and mobilize resources, if appropriate;
- Review, historical data as appropriate, including through BANNER, CIDS, MAXIMO, or other sources and summarize key issues.
- Negotiate with the wholesale customer for a mutually agreed upon solution.

- Report to their supervisor and/or the Wholesale Contracts Manager, or his/her designee, any activities or conditions which pose a conflict to these procedures; and
- If a resolution can not be mutually reached, ensure the customer understands the 60-day notification requirement.

NOTE: SPU leads for wholesale billing and metering will follow the procedures as outlined herein in regards to the application and investigation of complaints and disputes. If the Billing or Metering Lead believes the issues are beyond the scope of their authority to address, they will contact the Wholesale Contracts Manager who will identify a lead to resolve the issue.

Wholesale Water Customers:

Wholesale water customers may dispute the accuracy of any portion of charges billed by Seattle within a 60-day payment period from the date of bill. The wholesale water customer will notify Seattle in writing of the specific nature of the dispute. Any other related requirements can be found in the terms and conditions of the customer's individual contract.

3.0 COMPLAINT/DISPUTE RESOLUTION PROCESS

STEP 1. Informal Conference

Wholesale water customers may contact an SPU wholesale billing representative or an SPU metering representative, as appropriate to the concern. In many cases, questions or complaints will be addressed and resolved by the representative at the time of the call, or soon thereafter. If the representative is unable to resolve the customer's concerns, the wholesale customer may proceed to the next level of review.

As a part of the STEP 1 Informal Conference, the SPU lead will:

- Contact the customer to evaluate if their usage has changed.
- Ask the customer if their operations have changed.
- Review historic meter testing and consumption records.
- Verify when the meter was last tested and review the results.
- Determine if new meter reads need to be obtained following the above mentioned steps.
- Attempt to verify that the meter is installed according to the manufacture's specifications.

STEP 2. SPU Manager Review

Wholesale water customers who are dissatisfied with SPU's response to an informal conference may ask for a Manager's Review. In some cases, the direct SPU Billing Manager, Meter Manager or the Wholesale Contracts Lead may resolve the issue. In other cases another SPU manager may be asked to review the information pertaining to the dispute. As part of this review the wholesale customer must provide written notification with the specific nature of the dispute

within the 60-day payment period. In all cases, the Wholesale Contracts Manager will be notified, and if appropriate, assign the lead in resolving the dispute.

STEP 3. SPU Executive Review

Wholesale water customers who continue to be dissatisfied with SPU's response in STEPS 1 and 2 above, may ask for an Executive Review. Step 3 includes a review by a member or members of SPU's Executive Team. A proposed solution is to be developed at the conclusion of Step 3.

STEP 4. Dispute Resolution Process in Supply Contracts

If a dispute remains unresolved after Steps 1 through 3 have been pursued, the wholesale water customer and SPU have the option to pursue the dispute resolution procedures detailed in the individual wholesale customer's water supply contract.

4.0 PROCEDURES

Potential Billing Issues and Responses

- Calculation errors
 - Make corrections and send corrected document to the customer.
- Typing errors
 - Make corrections and send corrected document to the customer.
- Payment not received within 60-days of the payment period.
 - Contact customer
- Payment misapplied
 - Create service order to request transfer of funds to appropriate accounts(s).
- Payments sent by customer, but not applied to account (lost).
 - Request customer to verify the check has been cashed.
 - Request a copy of the check, front and back. Note: The City's Treasurer's Office tracks the payment by coding on the back of the check.
 - Apply interest charges and/or late fees if the payment is not made by the due date on wholesale customer's billing summary.

Billing Adjustments

- Request to redistribute consumption.
 - Consider if customer has documentation, such as date meter shut off. Wholesale customer shouldn't expect this to occur on an ongoing basis.
- Old Water Allowance transfer
 - This needs to be approved by the Wholesale Contracts Manager, after consultation with SPU Finance staff.
- Waive or reduce base service charge
 - This needs to be approved by the Wholesale Contracts Manager, after consultation with SPU Finance staff.

Questions Regarding Potentially Malfunctioning Meters:

- Can the meter be tested as installed in the field in line?
- Is the meter unable to be tested?
- Is the meter installed in accordance with the manufacture's specifications?
- Is the meter installed incorrectly?
- If the meter cannot be tested in line, can it be tested in the shop?
- If the meter can be tested in the shop and not in the field as installed, then remove the mechanical meter, or the top assembly of a turbine meter for testing.
- Do the valves operate properly?
- Do we have to depend on the wholesale customer's valve to isolate our meter?

Note: Before testing the meter in the field as installed, or in the SPU shop, make sure the wholesale customer is aware of SPU's testing plans.

WHO PAYS FOR METER TESTS AND WHEN?

In a situation where a customer calls disputing the accuracy of SPU's billing or meter reads, claiming that SPU reads are inconsistent with the reads from their meter, and SPU has determined that:

- The meter is under/over registering beyond AWWA standards:
 - SPU pays for the test if the meter test results are outside of AWWA standards.
 - SPU will recalculate the under or over billed quantity and adjust the customer's balance due accordingly.
- The meter has not recently been tested (within 9 months):
 - SPU would test the meter at no cost to the customer and this would be considered the annual meter test.
- The meter has recently been tested (within 9 months) and was accurate, then SPU will retest the meter:
 - This work would be charged to the customer if the meter tested accurately.
 - This work would be charged to SPU if the meter failed the test.
- The meter cannot be tested in the field as installed and has to be brought into the SPU meter shop, or sent to a private testing lab:
 - This work would be charged to the customer if the meter tested accurately, including crew time, shipping costs and test costs; and, This work would be charged to SPU if the meter failed the test.
- The customer proposes an alternative testing method:
 - The request will be sent to key SPU staff for approval or denial;
 - The work would be charged to SPU if the meter failed the test; and,
 - The work would be charged to the customer if the meter tested accurately.

Meter Testing Procedures:

SPU tests to AWWA standards.

SPU cannot anticipate all instances where billing and metering disputes will result in investigations. However, SPU will work quickly and diligently with the individual wholesale customer to determine the appropriate steps necessary to resolve the issue to the mutual satisfaction of both the customer and SPU.

5.0 REQUIRED DOCUMENTS/RECORDKEEPING

Billing and Metering Representatives are responsible for maintaining complaint or dispute documentation. In the event that another staff member is assigned the lead, documents related to the complaint or dispute will be provided to the new lead, and he/she will be required to document the remainder of the dispute until resolution.

6.0 PROCEDURE REVIEW

Periodic review of this procedural manual shall be performed by the SPU Customer Service Branch as changes or conditions warrant in order to ensure that it remains current.

7.0 REQUESTING A DISPUTE RESOLUTION PER INDIVIDUAL CONTRACTS

Another option to SPU's progressive complaint and dispute resolution process as outlined in the Wholesale Metering and Billing Dispute Policy, Policy # SPU-WCM-001, the wholesale customer and SPU may pursue the dispute resolution procedures detailed in the individual wholesale customer's water supply contract at any time. Upon such action, the SPU Wholesale Contracts Manager must be notified to insure that both the customer and SPU staff understand the next steps per individual contract requirements.

8.0 CLOSING COMPLAINTS AND DISPUTES

- SPU commits to resolving and closing complaints and disputes quickly and in compliance with the procedures as outlined.
- Complaints and disputes are considered closed once SPU has responded to the wholesale water customer verbally, if a complaint, or in writing if a dispute, and SPU has received no response from the wholesale customer for 30 days. In this case SPU has no obligation to consider the complaint or dispute further as provided for in this procedure. Any agreement by SPU to do so will be at SPU's sole discretion.

9.0 REFERENCES

- The Revised Code of Washington (RCW) 43.20.240
- Washington Administrative Code (WAC) 80-28

- Seattle Municipal Code (SMC) 21.04

