

# SIGNATURE CONCURRENCE FORM FOR GENERAL MANAGER'S OFFICE

**Person Making Request:** J. Norman Dizon      **LOB/Branch:** Financial and Risk Service      **Phone #:** 206-733-9836

**For GM/CEO Signature:**

**Date Needed:** 04/05/21      If no date is given, we will assume a two-week turnaround is acceptable.

**If urgent request (less than 3 business days), please provide reason:**

**Please provide a brief description of the request:**

Approval for Director's Rule CS-390, Dispute Escalation for Retail Customers

## Document Type:

- Contract/MOA/RDNA/RCEC (please provide separate cover memo with contract request)
- Legislation
- Letter
- Property issue
- Travel request (CEO signature required for overnight travel - to be submitted 30 days prior to travel)
- Other (enter explanation below):

Director's Rule

Paula Laschober  
Paula Laschober (Apr 1, 2021 09:16 PDT)

04/01/2021

  
Idris Beauregard (Apr 1, 2021 09:55 PDT)

04/01/2021

**Deputy Director**

**Date**

*Please submit this form and all applicable information to the GM/CEO front desk. Your document will be logged for signature. You will receive an email when your document is ready for pick up.*

**Date Received by GM/CEO:** \_\_\_\_\_



**Date:** March 29, 2021

**To:** Mami Hara, General Manager/CEO  
Idris Beauregard, Deputy Director, People, Culture & Community Branch  
Paula Laschober, Deputy Director, Financial and Risk Services Branch

**From:** Aurora Mendoza, Corporate Performance   
Marcus Jackson, Customer Response Division   
Natasha Papsoueva, Corporate Performance   
Dee Reed, Utility Account Services   
Ned Worcester, Risk and Quality Assurance 

**Re:** Director's Rule CS-390, Dispute Escalation for Retail Customers

---

We are requesting approval to revise and renumber Policy & Procedure CS-104, Customer Billing and Service Disputes Within the Customer Service Branch. The new number and title are Director's Rule CS-390, Dispute Escalation for Retail Customers. Enclosed is the final draft for your review and signature.

#### **Background and Rationale**

SPU's retail customers may request to dispute SPU decisions related to utility charges. SPU has a process for escalating disputes that generally consists of four review steps by the following personnel:

- 1) Utility staff
- 2) Staff supervisor or lead
- 3) Manager
- 4) SPU's Hearing Officer

The Customer Response Division and Utility Account Services are responsible for upfront steps 1 to 3. As the final step in SPU's dispute escalation process, the Hearing Officer is responsible for conducting a review and issuing the final written administrative decisions on behalf of the utility.

SPU's dispute process (CS-104) was established in 2005 and has remained unchanged since then. In 2016, Risk and Quality Assurance audited the appeals and dispute process and provided specific recommendations. Under the proposed revisions in CS-390, SPU will provide retail customers with an easily navigable process for escalating their disputes to help ensure fair and equitable delivery of services. The proposed changes will:

- Require staff to *automatically* escalate denied disputes internally on the customer's behalf.
- Include updated language that is easy to read, accurately reflects current practices, and aligns with recently approved SPU Director's Rules and procedures.
- Clarify roles and responsibilities of SPU staff and customers for clearer distinctions between each step of the process.
- Clarify expectations for dispute reviews, documentation, and reporting.
- Reduce timeframes.

**Drafting and Vetting**

As the policy lead, Aurora Mendoza led the drafting of CS-390. After preliminary content was drafted on October 27, 2020, CS-390 went through multiple iterations and vetting. The following table details the reviewal schedule that CS-390 underwent:

| <b>Date</b>       | <b>Reviewer(s)</b>   | <b>Work Group/Division</b>   |
|-------------------|--|--|
| November 3, 2020  | Dan Ward   | Risk & Quality Assurance Division  |
| November 10, 2020 | Cathy Thielen  | Utility Accounts Division  |
| November 12, 2020 | Amy Bonfrisco  | Risk & Quality Assurance Division  |
| November 16, 2020 | Beverly Flowers  | Customer Response Division   |
| November 20, 2020 | Dan Ward   | Risk & Quality Assurance Division  |
| December 1, 2020  | Natasha Papsoueva  | Corporate Performance Division   |
| December 14, 2020 | Dan Ward<br>Amy Bonfrisco<br>Norman Dizon                          | Risk & Quality Assurance Division  |
| January 19, 2021  | Kahreen Tebeau   | Corporate Policy & Government Relations  |
| January 27, 2021  | Paula Laschober<br>Dan Ward<br>Ned Worcester                       | Finance and Risk Services Branch   |
| January 29, 2021  | Amy Bonfrisco  | Risk & Quality Assurance Division  |
| February 1, 2021  | Steve Hamai  | Environment Justice and Social Equity  |
| February 10, 2021 | Norman Dizon   | Risk & Quality Assurance Division  |
| February 16, 2021 | Debra Reed<br>Cathy Thielen  | Utility Accounts Division  |
| February 17, 2021 | Marcus Jackson<br>Beverly Flowers                                  | Customer Response Division   |
| March 22, 2021    | Ned Worcester<br>Marcus Jackson<br>Natasha Papsoueva<br>Debra Reed | Risk & Quality Assurance Division<br>Customer Response Division<br>Corporate Performance Division<br>Utility Accounts Division |

We published a draft of CS-390 in late February to early March of this year in the Seattle Daily Journal of Commerce. We did not receive any comments from the public and incorporated some received internally.

**Approval**

Please sign electronically as prompted. We are aiming for an effective date of **April 7, 2021**. Upon approval, we will file the rule with the Office of the City Clerk, and post it to the SPUweb [Policy Library](#), as well as to [seattle.gov](http://seattle.gov).

If you have questions or concerns, please contact [Aurora Mendoza](#) . Thank you.



# Director's Rule

|  |                                |                                   |
|--|--------------------------------|-----------------------------------|
| <b>Title</b><br>Dispute Escalation for Retail Customers  | <b>Number</b><br>CS-390        | <b>Rev. no.</b><br>0              |
| <b>Responsibility</b><br>Financial and Risk Services; People, Culture and Community  | <b>Supersedes</b><br>CS-104    | <b>Pages</b><br>3                 |
| <b>General Manager/CEO Approval</b><br><br><small>Mami Hara (Apr 1, 2021 11:10 PDT)</small> | <b>Approved</b><br>Apr 1, 2021 | <b>Effective</b><br>April 7, 2021 |

**1. PURPOSE**

To establish a uniform Director's Rule for initiating and responding to retail customer's billing and service disputes.

**2. DEFINITIONS**

*Customer.* an owner of residential or commercial property within SPU's retail water, wastewater, drainage, and solid waste service area as defined in [FIN-160, Customer Account and Billing Management](#).

*Timely.* Predefined deadlines and timeframes as defined in [FIN-160, Customer Account and Billing Management](#) and related billing policies and procedures.

**3. GENERAL RULES**

- Provide customers upfront with a navigable dispute process for escalating their disputes to promote fair and equitable delivery of services.
- Provide an independent interpreter through SPU's services for interpretation, teleprinters/teletypewriters (TTY), or Telecommunications Device for the Deaf (TDD in cases where there is a language, speech, or hearing barrier).
- Ensure timely, accurate, efficient, and effective delivery of utility services that bring value to our customers.
- Guide billing decisions in accordance with state and local laws, and organizational goals and objectives.
- Advance alignment and consistency with related customer billing policies.

**4. DISPUTED AND UNDISPUTED CHARGES**

- Undisputed charges should be paid at the time the dispute is initiated.
- Customers disputing utility charges or services will continue to receive services provided the customer continues to pay all undisputed amounts, including amounts due under a pay plan or payment arrangement.
- Credit and collection actions will remain suspended until SPU has responded to the customer's dispute in accordance with this Director's Rule.
- If a dispute is denied, credit and collection action for payment of charges will resume.

## 5. INITIATION AND TIMEFRAME OF A DISPUTE

Customers can dispute a bill by contacting SPU by any one of these methods:

- Use our [Customer Service Request online form](#).
- Call an SPU customer service representative at (206) 684-3000.
- Visit the Customer Service Center in the lobby of the Seattle Municipal Tower, 700 Fifth Avenue, Seattle, WA 98104.
- Mail your letter to:  
Seattle Public Utilities  
Attention: Customer Response Division  
PO Box 34027  
Seattle, WA 98124-4027

Standard processing time for initiating and resolving a dispute is 20 business days upon receipt of a dispute. SPU will inform the customer throughout the process if the timeframe needs an extension, particularly for more complex disputes.

## 6. ROLES AND RESPONSIBILITIES

In addition to the responsibilities described in [FIN-160 Customer Account and Billing Management](#), SPU and customer responsibilities in the dispute escalation process are described as follows:

### **SPU Retail Customers shall be responsible for:**

- Initiating disputes in a timely manner upon receiving a bill that contains disputed charges, or upon notification of a pending utility action or service matter that a customer is disputing.
- Clearly describing the nature and reason for the dispute, dollar amounts, dates, or specific action(s) being disputed and what corrective action or relief is being sought.
- Responding within 10 business days of receiving staff's communications.
- Escalating disputes to the next step within 10 business days of receiving a decision on a dispute. SPU's progressive dispute escalation process, which generally consists of the following:
  - Utility staff review
  - Supervisor/Lead review
  - Managerial review
  - Hearing Officer review
- Cooperating in good faith by being responsive and providing SPU staff with invoices, receipts, diagrams, photos, videos, or other supplementary materials upon request.
- Requesting interpreter services through SPU when needed.

### **SPU Employees shall be responsible for:**

#### ***Intake Process***

- Initiating review within 2 business days of receiving a customer dispute.
- Informing the customer throughout the process if the timeframe needs an extension, particularly for more complex disputes.
- When the initial dispute is denied, escalating disputes internally from one level to the next level, up to the Hearing Officer.
- Timely acknowledging disputes, assisting and directing customers through the dispute process, making appropriate referrals, and noting account records.
- Providing written and verbal explanations of the dispute resolution process to customers.
- Timely informing customers of updates to their dispute's status, including following up with customers (via telephone, email, or letter) to convey decisions.

- Entering clear and accurate notes on customer's account that document all customer disputes, as well as utility actions, responses, referrals, and decisions.
- Ensuring that any delegating to another employee, supervisor, manager, or to the Hearing Officer is successful.
- Ensuring that appropriate account adjustments have been made and/or pay plans are in place to resolve the issues in dispute.
- Providing interpreter services through SPU when needed.

### ***Appeal Process***

- Timely acknowledging any requests (written notice, email, or verbal) by issuing a hearing confirmation packet to the customer.
- Conducting an objective and independent review of the dispute by considering all relevant facts, business records and information provided by the customer, SPU staff, and any other relevant individuals or entities.
- Providing the customer with the option for a hearing.
- Issuing a final written administrative decision summarizing the relevant facts, policies, and applicable rules and regulations that were relied upon to arrive at such decision.
- Noting the final decision in the customer's contact notes.

Under [FIN-160 Customer Account and Billing Management](#), the General Manager/Chief Executive Officer has the ultimate review and decision authority for any customer dispute.

## **7. REPORTING**

On an annual basis, the Deputy Director of Financial and Risk Services Branch shall submit an appeal report to the General Manager/Chief Executive Officer that tracks appeals and monitors policy impacts for further analysis and decision making.

## **8. AUTHORITY/REFERENCES**

- [FIN-160, Customer Account and Billing Management](#)
- [CS-320, Billing Adjustments for Retail and Wholesale Customers](#)
- [CS-325, Leak Adjustment for Retail Customers](#)
- [CS-340, Waivers for Retail Customers](#)
- [CS-360, Pay Plans and Payment Arrangements for Retail Customers](#)
- [Seattle City Workplace Values and Expectations](#)