




# Director's Rule

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