



ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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March 19, 2021

SENT VIA WUTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: Docket UE-210137 Puget Sound Energy Proposed Revision to Tariff WN U-2 Schedule 129, Crisis Affected Customer Assistance Program (CACAP-2) to provide additional bill assistance to customers impacted by the COVID-19 Pandemic.

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in advance of the March 25, 2021 Open Meeting. These comments are in response to Puget Sound Energy's filing of proposed changes to the Company's tariff WN U-2, Schedule 129, Crisis Affected Customer Assistance Program (CACAP). Public Counsel appreciates the in-depth discussion and work put in through the Low Income Advisory Group, and PSE's efforts to elicit feedback from stakeholders.

In accordance with Order 01 in Docket U-200281, PSE has developed another bill payment assistance program that will provide relief for qualified customers with arrearages resulting from the economic crisis caused by the COVID-19 Pandemic. In 2020, PSE established CACAP to provide relief to customers facing hardship. This proposed program, known as CACAP-2, sets different eligibility criteria and expands the funds available to assist customers who have fallen behind on their bills and have been unable to make regular payments due to the persisting crisis. Public Counsel believes these additional programs will assist the most vulnerable customers reduce their arrearages and keep their power on during the continuing public health and economic crisis.

Public Counsel's Recommendation

Public Counsel recommends the Commission approve the proposed tariff revisions, which incorporate the CACAP-2 program into the Company's low-income assistance tariff.

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COMMISSION

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Customers have multiple pathways to receive assistance in CACAP-2, which is intended to reach those with arrearages and an annual household income at or below 200 percent of the Federal Poverty Level. Qualifying customers may receive assistance bill assistance equal to their arrearage amount, up to a maximum grant of \$2,500, and may apply more than once during a 12-month period until the maximum benefit is reached.

PSE will automatically enroll customers who have a past-due balance on their account of more than 60 days and have received any form of bill assistance in the last two program years, including the current year. The Company anticipates almost 8,000 customers will be auto-approved. Those with an arrearage less than 60 days past due who have received bill assistance in the current program year will be required to apply and be automatically approved. PSE will work with the community action agencies in their area to administer the program to customers who have not previously qualified for a low-income assistance program and do not meet the above criteria for qualification.

Public Counsel appreciates PSE's efforts to develop and implement this program; however, we strongly encourage the Company to begin work to develop a permanent and robust arrearage management program and other low-income offerings. We expect that there will be long lasting impacts from the COVID-19 Pandemic and economic crisis that will not be addressed by the dollars set aside for this short-term program. Public Counsel believes that it is important to develop comprehensive programs to help customers keep their power on in the event of future public or personal crises.

Additionally, Public Counsel urges PSE to provide the data required under Order 01 in Docket U-200281 in advance of the May Open Meeting at which the Commission will evaluate the disconnection moratorium. Providing the data ahead of the May Open Meeting will allow the Commission and stakeholders to review and analyze the data to understand how debt assistance programs have reached customers.

Again, we appreciate the opportunity to submit these comments. If you have any questions about this filing, please contact Shay Bauman at (206) 379-4211 or via e-mail at Shay.Bauman@atg.wa.gov.

Sincerely,

/s/ *Lisa W. Gafken*

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