

December 21, 2015

Steven V. King
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket No. U-144155

Dear Mr. King,

The Energy Project (TEP) submits the following comments concerning Washington Utilities and Transportation Commission's ("Commission") June 22, 2015 Notice of Opportunity to Submit Written Comments issued in Docket U-144155.

As a longtime advocate for low-income households throughout Washington State, TEP is pleased to see the Commission is considering modifying the rule governing the timeframe for which investor owned utilities are allowed to collect payment from customers for retroactive bills. The current practice of allowing utilities to bill retroactively for up to three years poses a significant threat to low-income residential customers, who in many cases struggle to pay their monthly utility bills. For low-income customers, paying a utility bill that has accrued for up to 36 months would be a financial hardship that puts these households at risk of food insecurity, bankruptcy, or even eviction.

The affordability of utility bills is a problem that affects low-income households nationwide. As noted in a recent study, "Nearly a third of the low income consumers' households were unable to pay their full electric bill on time at least once in the past year (30%), with a median of two months in which the household's bill was not paid in full."¹ Modifying the existing rule of a 36 month retroactive billing timeframe to a six month timeframe will be a significant step toward ensuring that low-income households will be protected against receiving a large retroactive bill that could have devastating impacts to their financial well being. TEP supports the Commission's recommended change to a six-month adjustment on corrected bills.

¹ Smart Grid Consumer Collaborative, Spotlight on Low Income Consumers II (April 2014)

the
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a project of:

opportunity
council 

TEP appreciates the opportunity to provide comments on this important topic. Please feel free to contact me at TEP with any questions or additional information requests pertaining to this filing.

Sincerely,

A handwritten signature in black ink, appearing to be 'SC', written in a cursive style.

Shawn Collins
Director, The Energy Project