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PUGET SOUND ENERGY

The Energy To Do Great Things

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Via electronic mail – records@utc.wa.gov

May 10, 2010

Mr. David W. Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Subject: Docket No. U-100523
Rulemaking to Consider Paperless Billing for Electric and Gas Customers.
Comments of Puget Sound Energy, Inc.

Dear Mr. Danner:

Puget Sound Energy, Inc. (“PSE” or the “Company”) submits these comments in response to the April 9, 2010, Notice of Opportunity to File Written Comments. These comments address the issue of whether the Commission should develop a new rule and/or modify existing Rules in order to provide Customers with an option of receiving various documents in electronic format.

Nationwide, an increasing number of utilities are offering paperless billing, with utility customer adoption rates growing each year and more customers paying online.¹ We find this particularly relevant to our customers, since the Pacific Northwest is known for having a high percentage of Internet users, in comparison with other U.S. regions.²

Puget Sound Energy Recommendation

Companies should have the option to provide Customers or other interested parties bills, notices of tariff revisions, bill inserts, adjudicative proceeding documents, and any reports required by settlement stipulations by electronic means, in lieu of the use of paper copies. The benefits of allowing this choice would be: 1) increased customer choice; 2) improving the flow of information; 3) savings on mailing costs; and 4) savings on printing costs. Rather than proposing duplicative language regarding electronic billing to each of these rules, the Commission could consider a single new rule in WAC 480-90 and one in 480-100 addressing electronic delivery of bills and other documents such as the first two suggested rules below. The following two suggested new rules and four changes to existing rules are drafted as examples of tying the suggested WAC 480-90-xxx and 480-100-xxx into existing rules.

Suggested new rule language:

WAC 480-90-xxx

A utility shall have the option to provide an applicant or customer or other interested parties bills, notices of tariff revisions, bill inserts including inserts containing information required to be provided to customers or applicants by WAC or RCW or Commission Order, adjudicative proceeding documents, and any reports or information required by settlement stipulations by electronic means, in lieu of the use of paper copies sent by U.S. Mail, provided that the customer or applicant has so requested. Where an applicant or customer requests billing by electronic means, utilities may include all items normally included with bills sent by U.S. Mail with the electronic bill.

¹ E Source Announces Results from E-Business Metrics Survey - Study Finds Paperless Billing Adoption for Utilities Is Now 9.6% and 18.0% of Utility Payments Are Made Online. E-Source, 2009, [http://www.esource.com/esource/getpub/public/pdf/press_releases/ES_PR_EBiz_Metrics_3-10.pdf?bcsi_scan_D93EF5AA08308DE4=ITZoTS9GFKkcpHBP1QSUfb8cN8UBAAAA5z7vAA=&bcsi_scan_filename=ES PR_EBiz_Metrics_3-10.pdf](http://www.esource.com/esource/getpub/public/pdf/press_releases/ES_PR_EBiz_Metrics_3-10.pdf?bcsi_scan_D93EF5AA08308DE4=ITZoTS9GFKkcpHBP1QSUfb8cN8UBAAAA5z7vAA=&bcsi_scan_filename=ES_PR_EBiz_Metrics_3-10.pdf), accessed on May 5, 2010.

² Spooner, Tom. Internet Use by Region in the United States. Pew Internet & American Life Project, August 27, 2003, http://www.pewinternet.org/~media/Files/Reports/2003/PIP_Regional_Report_Aug_2003.pdf, accessed on May 4, 2010.

WAC 480-100-xxx

A utility shall have the option to provide an applicant or customer or other interested parties with bills, notices of tariff revisions, bill inserts including inserts containing information required to be provided to customers or applicants by WAC or RCW or Commission Order, adjudicative proceeding documents, and any reports or information required by settlement stipulations by electronic means, in lieu of the use of paper copies sent by U.S. Mail, provided that the customer or applicant has so requested. Where an applicant or customer requests billing by electronic means, utilities may include all items normally included with bills sent by U.S. Mail with the electronic bill.

WAC 480-90-178(4)

A utility shall have the option to provide customers or other interested parties bills as provided by WAC 480-90-xxx

WAC 480-100-178(4)

A utility shall have the option to provide customers or other interested parties bills as provided by WAC 480-100-xxx

Suggested modifications to existing rule language (the same suggestions are made for the corresponding rules in WAC 480-90):

WAC 480-100-194

Each electric utility offering service under tariff must publish *or provide electronically* all proposed changes to its tariff for at least thirty days, as required by RCW 80.28.060. For any proposed tariff change that would increase recurring or per-occurrence charges or restrict access to services (e.g., discontinue a service, or limit access to service by imposing a new usage level on existing services), a utility must fulfill the requirements of subsection (1), (2), or (3) of this section. For any other proposed tariffs, the utility must fulfill the requirements of WAC 480-100-195. The utility will not be required to accomplish publication under this section if it has agreed to suspend its tariff filing and to provide notice as provided under WAC 480-100-197.

WAC 480-100-194(1)

Thirty-day notice to individual customers. To comply under this method, the utility must, at least thirty days before the stated effective date of the proposed change, mail *or provide electronically* the posting to each customer that would be affected by the proposed change. The posting must include the information listed in subsection (4) of

this section.

WAC 480-100-194(3)(a)

(3) Reduced publication with shortened notice to individual customers. To comply under this method, the utility must:

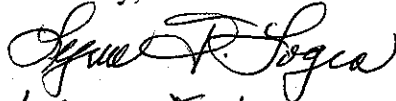
(a) Mail or provide electronically the posting to each customer that would be affected by the proposed change at least fifteen days before the stated effective date of the proposed change;

WAC 480-100-103

(3) The utility must provide to each applicant relevant rate information and a brochure that explains the rights and responsibilities of a utility customer. The brochure must include, at a minimum, information about the utility's regular business hours, the utility's mailing address, the utility's toll-free number, the twenty-four hour emergency number(s), and an explanation of the utility's processes to establish credit, deposits, billing, delinquent accounts, disconnection of service initiated by the utility, cancellation of service by the customer, the dispute process, and the commission's informal complaint procedures to be followed if the customer remains dissatisfied with the utility's dispute process. *The utility may provide any of this information in an electronic format.*

PSE appreciates the opportunity to present its comments on the benefits of developing a new rule or modifying existing rules on this subject. Please direct any questions regarding these comments to Lynn Logen at (425) 462-3872 or at lynn.logen@pse.com or the undersigned at (425) 462-3495.

Sincerely,



Lynn F. Logen
Tariff Consultant

for

Tom DeBoer

Director – Federal and State Regulatory Affairs