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April 8, 2020

VIA UTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, WA 98503

Re: *Tariff Revision, Schedule 129, Crisis Affected Customer Assistance Program,*
Dockets UE-200331 and UG-200332

Dear Mr. Johnson:

On April 6, 2020, Puget Sound Energy (“Company” or PSE) filed a tariff revision for low-income bill assistance programs in response to the ongoing COVID-19 public health crisis and related economic hardship. The Company seeks a less than statutory notice to revise their low-income bill assistance tariff to include an emergency grant for customers who face economic hardship as a result of the pandemic, known as the Crisis Affected Customer Assistance Program (CACAP). The Company’s filing does not make any changes to the existing low-income bill assistance program, Home Energy Lifeline Program (HELP). Public Counsel appreciates the Company’s efforts to respond to the crisis on a short timeline and looks forward to further collaboration with stakeholders to develop further programmatic responses.

PSE met virtually with stakeholders to discuss crisis response on April 2, 2020, and again on April 7, 2020. Prior to the April 2 meeting, the Company contacted Public Counsel to indicate that they would take steps to address the crisis, but did not have specific details to provide. The Company presented the CACAP program during the April 2 meeting and most stakeholders, including Public Counsel, were learning of the program’s details on the fly without any documentation from PSE. The Company scheduled a second meeting on April 7 to further discuss stakeholder concerns about CACAP, which had been formally filed the previous day. Stakeholders were not notified of the April 6 filing ahead of the second meeting and, thus, did not have time to formally review the filing. Based on discussion during the April 7 meeting, Public Counsel anticipates that PSE will offer revisions to their filing to address stakeholder concerns. At the time of this letter’s filing, the Company has not provided a revised tariff filing.

The shared goal of the Company and stakeholders should be to get assistance to customers facing economic hardship during this crisis as quickly and efficiently as possible. At the same time, crisis response should also include ongoing bill assistance programs, such as HELP, and not unintentionally harm PSE’s most economically vulnerable customers. Public Counsel looks forward to and expects close collaboration on this issue and will be present during the April 10

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To: Mark L. Johnson
Re: Dockets UE-200307 and UG-200308
Date: April 3, 2020
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Open Meeting. Questions can be directed to Corey Dahl, at (206) 464-6380 or corey.dahl@atg.wa.gov.

Sincerely,

/s/ Corey J Dahl
COREY J. DAHL
Regulatory Analyst
Public Counsel Unit
Washington State Office of the Attorney General.