



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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March 18, 2022

**NOTICE OF OPPORTUNITY TO FILE WRITTEN COMMENTS**  
**(By Friday, April 29, 2022, at 5 p.m.)**

Re: Rulemaking to consider potential long-term changes and improvements to customer notice, credit, and collection rules, including permanent elimination of late fees, disconnection and reconnection fees, and deposits,  
Docket U-210800

TO ALL INTERESTED PERSONS:

On March 18, 2022, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider potential long-term changes and improvements to customer notice, credit, and collection rules, including the permanent elimination of late fees, disconnection and reconnection fees, and deposits. The Commission filed the CR-101 under Docket U-210800.

The Commission seeks stakeholder input to inform its inquiry, including general comments related to the scope and purposes of this rulemaking. Electric and natural gas companies subject to the Commission's jurisdiction are expected to respond to the questions below. Other interested stakeholders are invited to submit comments in response to the questions in this notice.

**Questions**

For the purpose of this Notice, "low-income customers" refer to customers who have received any form of energy assistance in the 2018 and 2019 calendar years.

**Disconnection and Reconnection**

1. Does your company currently have a residential disconnection and/or reconnection fee in its filed tariff?
  - a. If so, please provide citations to all appropriate tariff references.
2. Please provide the following information regarding the fees your company collected in 2018 and 2019, respectively:
  - a. Please provide the total dollar amount collected from residential customers for

- disconnection fees and reconnection fees each year, identifying each fee category separately.
- b. Please provide the total number of residential customer accounts and the number of customer accounts assessed disconnection fees or reconnection fees each year. Please identify each fee category separately, include only reconnection fees for previously disconnected customers, and exclude new customers reconnecting at an existing service address.
  - c. Please provide the percentage of retail revenue your company derived from residential customer disconnection fees and reconnection fees each year, identifying each fee category separately.
  - d. If these disconnection fees and reconnection fees were removed from the company's tariff and recovered in base rates instead, how much would residential bills increase based on your company's currently approved rate spread? Please provide both a percentage increase and an average residential customer bill increase amount.
3. Please provide the following information regarding the cost of disconnection and reconnection in 2018 and 2019, respectively, identifying each fee category separately.
- a. What is the total cost the company incurred disconnecting residential customers each year?
  - b. What is the total cost the company incurred reconnecting residential customers each year?
  - c. What is the average annual cost for disconnection and reconnection by year?
  - d. If your company has deployed advanced metering infrastructure (AMI), please provide separately a cost breakdown of disconnection and reconnection fees for residential customers with AMI meters installed. Please also provide a side-by-side comparison of costs incurred both to disconnect and reconnect non-communicating meters with costs incurred to disconnect and reconnect AMI meters.
4. Please provide the following information related to residential disconnections for non-payment in 2018 and 2019, respectively.
- a. The number of disconnections
  - b. The average duration of disconnection
  - c. The average duration of disconnection for non-payment for low-income customers each year?
5. Please provide the following information regarding disconnections among low-income residential customers:
- a. In each of 2018 and 2019, what percentage of total residential customer disconnection fees and reconnection fees were charged to low-income customers? Please identify the percentage for each fee category separately.
  - b. What percentage of customers facing disconnection successfully applied for and

received energy assistance that allowed them to avoid disconnection in 2018 and 2019, respectively?

6. Please identify barriers you have encountered to payment for low-income customers, members of highly impacted communities, and/or vulnerable populations. For the companies, what steps has your company taken to address identified barriers, if any? Please describe the results of these steps and provide any data you have relied upon for this analysis.

### **Deposits**

7. Does your company currently collect deposits from residential customers?
  - a. If so, please identify all references in your tariff governing residential customer deposits.
8. Please provide the following information regarding the residential customer deposits collected by your company in 2018 and 2019, respectively:
  - a. Please provide the total dollar amount collected for residential customer deposits each year.
  - b. How many customer accounts paid deposits each year?
  - c. What percentage of retail revenue did your company derive from residential customer deposits each year?
  - d. How many customers used part or all their deposit to offset account balances?
  - e. What percentage of customers who used part or all their deposit to pay for account balances each year requested reconnection within 12-months of disconnection?
9. Please provide the following information regarding deposits among low-income customers in 2018 and 2019, respectively:
  - a. What percentage of customers who paid deposits were low-income customers?
  - b. If possible, please identify the percentage of customers who paid deposits who are members of a highly impacted community or vulnerable population.

### **Late fees**

10. Does your company's tariff currently include a late fee for residential customers?
  - a. If so, please identify all the appropriate tariff references.
11. Please provide the following information regarding the late fees your company collected in 2018 and 2019, respectively:
  - a. Please provide the total dollar amount collected in late fees for each year.
  - b. How many residential customer accounts paid late fees each year?
  - c. What percentage of retail revenue did your company derive from residential late fees each year?

- d. If late fees were no longer collected and were to be recovered in base rates instead, how much would residential bill increase based on your current approved rate spread? Please provide both a percentage increase and an average residential customer bill increase amount.
12. Please provide the following information regarding late fees affecting low-income customers in 2018 and 2019, respectively:
    - a. What percentage of late fees were charged to low-income customers each year?
    - b. If possible, please identify the percent of customers charged late fees in each year who were members of a highly impacted community or vulnerable populations.

### **Credit and Collection**

13. Please provide all references in your company's tariff, and citations to all applicable rules and regulations, governing the credit and collection processes used by your utility.
14. Please provide the following information regarding credit and collection:
  - a. A detailed narrative describing your company's credit and collection process. As part of this narrative, please identify both internal and external processes and explain how they operate, including any voluntary customer service principles;
  - b. If applicable, the number of customers sent to collections in each of 2018 and 2019; and
  - c. If applicable, the number of low-income customers who had account balances sent to collections in the year the customer received energy assistance.

### **Disconnection Notices**

15. Has your company identified opportunities to improve customer notice rules? Please describe those opportunities and the steps your company is taking to implement them.
16. Please provide a list of all languages in which your company provides translated disconnection notices.
17. How does your company determine in which language(s) the customer should receive written communications (particularly in relation to the disconnection notice)?
18. Has your company identified any barriers in the process of providing notices to customers?
  - a. If so, please identify and describe these barriers.
  - b. Has your company taken steps to address any identified barriers?
  - c. Have the steps taken either reduced the number of disconnections or otherwise yielded results in terms of improving the disconnection process? If so, please provide the results and any analysis your company has conducted of the results.

19. Are you aware of any policies, rules, or guidance concerning equity in developing or providing customer notice in use by other companies or state commissions? If so, please identify the policies, rules, or guidance, referencing the company or state commission that has adopted the policy, rule, or guidance.
20. Are you aware of any best practices or examples from other jurisdictions or other utility sectors that the Commission should consider in this proceeding regarding late fees, disconnection fees, reconnection fees, deposits, credit and collection practices, and customer notices? If so, please identify these best practices or examples, referencing the company or jurisdiction that has adopted these practices.

The Commission invites initial written comments in response to these questions and will conduct a workshop to discuss these issues.

The CR-101, as filed with the Code Reviser, is available for inspection on the Commission's website at <https://www.utc.wa.gov/casedocket/2021/210800/docsets>. If you are unable to access the Commission's web page and would like an electronic copy of the CR-101 emailed to you, please contact the Records Center at (360) 664-1234.

## WRITTEN COMMENTS

Pursuant to WAC 480-07-250(3), written comments must be submitted in electronic form, specifically in searchable .pdf format (Adobe Acrobat or comparable software). As provided in WAC 480-07-140(5), those comments must be submitted via the Commission's web portal at [www.utc.wa.gov/e-filing](http://www.utc.wa.gov/e-filing). If you are unable to submit documents via the portal, you may submit your comments by email to the Commission's Records Center at [records@utc.wa.gov](mailto:records@utc.wa.gov) or by mailing an electronic copy to the Commission's Records Center on a flash drive, DVD, or compact disc that includes the filed document(s). Comment submissions should include:

- The docket number of this proceeding (Docket U-210800).
- The commenting party's name.
- The title and date of the comment or comments.

The Commission will post on its website all comments that are provided in electronic format. The website is located at [www.utc.wa.gov/casedocket/2021/210800/docsets](http://www.utc.wa.gov/casedocket/2021/210800/docsets).

If you are unable to file your comments electronically the Commission will accept a paper document. If you have questions regarding this rulemaking, you may contact staff lead Andrew Roberts at (360) 664-1101, or by email at [andrew.roberts@utc.wa.gov](mailto:andrew.roberts@utc.wa.gov).

Stakeholders will have further opportunity for comment. Information about the schedule and other aspects of the rulemaking, including comments, will be posted on the Commission's

website as it becomes available. If you wish to receive further information on this rulemaking you may:

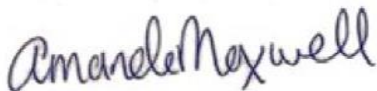
- Call the Commission's Records Center at (360) 664-1139
- Email the Commission at [records@utc.wa.gov](mailto:records@utc.wa.gov)
- Mail written comments to the address below

When contacting the Commission, please refer to Docket U-210800 to ensure that you are placed on the appropriate service list. The Commission's mailing address is:

Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE, Lacey, WA 98503  
P.O. Box 47250  
Olympia, WA 98504-7250

#### NOTICE

**If you do not want to comment now, but do want to receive future information about this rulemaking, please notify the Executive Director and Secretary in one of the ways described above and ask to be included on the Interested Persons (IP) list for Docket U-210800. If you do not ask to be added to the IP list, you will not receive further communications about this rulemaking.**



AMANDA MAXWELL  
Executive Director and Secretary