Disconnection Workshop U-210800, Customer Notice and Fees Rulemaking

Comments for workshop on June 23, 2023

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Puget Sound Energy Comments

- PSE currently faces staggering and growing arrearage balances. Disconnection should certainly be a last resort to address a past due balance, however, the current credit and collections system is built around disconnects as an option.
- The primary focus of reform for the credit and collections process should be on how to motivate customers to address and remit timely payment on their bills or take advantage of the many assistance programs that will help them do that.
- The status quo of freezing credit and collections processes is not working – and this may indicate that eliminating disconnections as an optional last resort may not be in the best interests of all customers.



PSE has reached a substantial level of arrearages and customers past-due



Source: U-200281

Past due customers and amounts



Assistance programs

Energy assistance distributed between March 2020 and December 2022



Energy assistance locks decreased during disconnect moratorium





Payment arrangements decreased during disconnect moratorium

How quickly does reconnection happen?

PSE has disconnected less than 1% of customers who at some point found themselves past due during 2023.

Reconnection requires a customer to initiate the process:

- 61% of disconnections where the customer initiates a reconnection, were reconnected same day
- 70% of disconnections where the customer initiates a
 reconnection, were reconnected either same day or next day



PSE's energy assistance programs for incomequalified customers

PSE's energy assistance programs portfolio





9

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Outreach

Mission:

Ensuring that all customers, no matter their income level, language proficiency or where they live, have access to financial assistance, energy saving solutions, along with clean energy options.

Goals:

- Providing bill assistance & bill arrangements for income qualified customers who are behind on their bills
- Overcoming language barriers through multilingual outreach
- Reaching customers in Named Communities to achieve awareness of program offerings and increase engagement
- Utilizing our community partners to extend our reach and provide trusted advocacy



Multilingual engagement

We are using multilingual advertising and community outreach to reach all in-need customers:

- Developing close relationships with key local non-profits serving non-English proficient communities, to help advocate for PSE assistance programs
- Utilizing our bilingual community-based outreach team, with 5 native Spanish speakers
- All energy & bill assistance advertising campaigns now integrated using Spanish & English
- Creating digital and print collateral in Spanish, Russian, Chinese, Vietnamese & Korean
- Participating in Spanish, Chinese and Vietnamese events, with native language speakers



Integrated campaigns reaching Named Communities

Reaching these communities that are facing heightened environmental burdens, combined with socioeconomic and health challenges, PSE developed initiatives tailored to address their localized needs. Examples of a few of these campaigns:

- Senior campaign outreach activities at local senior centers, utilizing radio, direct and community newspaper in reaching these hard-to-reach rural customers.
- Vietnamese/Chinese campaign held events at selected community centers, utilizing native language speaking associates and utilizing in-language collateral.
- Spanish campaign leverages strong relationships with non-profits serving the Hispanic community to hold classes on available assistance options. Campaign also includes presence at multiple community events, advertising on Spanish radio, social media, newspapers.
- Tribal campaign localized campaigns working with tribal food pantries and social services.



Focus on customer assistance and support

Disconnections should remain as a last resort option. The primary focus of reform for the credit and collections process should be on preventing disconnections by making customers aware that they are financially responsible for receiving energy services, and motivating and assisting them to pay their bills through:

- o Increased access to assistance programs through self-service options
- Adopting rules like those in Oregon that provide for changes to the rules defining disconnection of service to ensure vulnerable populations are protected
- Adjustments to the language defining what actions a utility must take before disconnecting a customer that offers to pay cash at the door
- Waiving select charges for low-income customers
- Extension of the period of time required to notify customers of a disconnection of service due to nonpayment
- o Continued implementation of Disconnect Reduction Plans

