

EXHIBIT A

Wallace, Carol

From: Cook, Corey (UTC) <corey.cook@utc.wa.gov>
Sent: Wednesday, July 31, 2024 3:36 PM
To: Sasville, Suzanne; Wallace, Carol; Burch, Theresa
Cc: Yochi Zakai; charlee@nwenergy.org; Shaylee Stokes ; Dreyer, Jean Marie (ATG); Dahl, Corey J (ATG)
Subject: Follow-Up to 7/9/24 LIAG discussion

CAUTION - EXTERNAL EMAIL

Phishing? Click the PhishAlarm "Report Phish" button.

Carol, Theresa, Suzanne, Puget Sound Energy, et al.,

I am reaching out on behalf of Staff, The Energy Project (TEP), and NW Energy Coalition (NWECC) regarding Puget Sound Energy's (PSE, Puget, or Company) compliance with Docket UG-230470, Order 01, Condition 4 (the Order), which requires PSE to enroll 70,000 customers in its low-income programs to ensure its low-income customers receive the benefits of PSE's CCA Compliance efforts.

In May 2024, TEP took this issue to PSE directly to request extension of the enrollment period beyond the 6-8 months when customers were initially enrolled. Puget appeared to be agreeable to extending the enrollment period to allow PSE to make additional outreach efforts to these customers as well as giving additional time for these customers to contact PSE and complete their bill discount rate (BDR) enrollment.

PSE described its efforts to meet the 70,000 enrollment target which included, among other things, "targeted communications inviting and encouraging [enrollees] to complete the self-attestation applications."^[1] Staff understood PSE's efforts to be compliant with the Order, Condition, and RCW 70A.65.130(2)(c). On June 20, 2024, Staff submitted a Compliance Letter to the Commission supporting PSE's Compliance Filing.

However, on July 9, 2024, at Puget's scheduled Low-Income Advisory Group (LIAG) meeting, it explained that any customers (more than 50,000 out of 70,000) who have not reached out to the Company by a certain date in August 2024, would be disenrolled from any discounts; including a CCA-related low-income flag for those same customers.

Staff is disheartened by PSE's lack of effort to hold its low-income customers harmless from CCA-compliance and its willingness to undo the commendable work it took to reach this enrollment target. Considering PSE's outreach efforts thus far have been two emails, it does not appear PSE is putting forth an earnest effort to be compliant with the spirit of Order 01. We also note the harms of disenrollment would be exacerbated by the upcoming winter season and increased rates.

We are collectively asking PSE to voluntarily do the following, at a minimum, as a show of good faith towards its LIAG and low-income customers:

1. Immediately discontinue any efforts to disenroll customers from its BDR or Low-Income CCA flags.
2. Begin targeted outreach efforts, beyond emails, to the customers who have not yet submitted a paper application to PSE.

- a. Outreach efforts should, at a minimum, include U.S. Postal Service mail to all customers; targeted telephone calls to a subset of the most vulnerable 20% of customers. PSE should first contact all customers who were past-due at any time in the last 24 months.
 - i. Factors for determining vulnerability beyond the initial 24-month past-due threshold should include: past-due amount owed and age of debt, prior obligation, and disconnection status.
 - b. PSE should also work with the LIAG to determine what, if any, additional outreach efforts are appropriate for reaching these customers.
3. PSE should continue to pass along the benefits of its CCA low-income credit to all customers identified above for a minimum of two years from the initial date of enrollment.
 - 4.

Staff interprets the 70,000-customer condition of the Order to be a minimum, or baseline, requirement of enrollment; not a threshold to be met at a singular point in time. It is unreasonable for PSE to believe that its disenrollment of these 50,000+ customers is compliant with Order 01, RCW 70A.65.130, or the Company's CCA requirements.

It is worth noting that PSE's actions to reach these customers would not satisfy the bare minimum late-payment noticing requirements in WAC 480-100 and 480-90. Consequently, Staff believes the requests made here are reasonable. We look forward to collaborating on this ongoing work with PSE and the LIAG, helping to ensure PSE's continuing compliance with applicable laws, rules, regulations, and Commission Orders.

We appreciate PSE taking the time to review our concerns. We would appreciate a response no later than Wednesday, Aug. 7, 2024.

If you have any questions or concerns, I am available to assist you.

Thanks,

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This email/letter states the informal opinions of commission staff, offered as technical assistance, and are not intended as legal advice. We reserve the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff's opinions are not binding on the commission.

^[1] *Wash. Utils. & Transp. Comm'n v. Puget Sound Energy*, Docket UG-230470, Compliance Filing of Puget Sound Energy, ¶ 14 (April 25, 2024).