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**STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

IN THE MATTER OF THE JOINT
APPLICATION OF

NO. U-180680

PUGET SOUND ENERGY, ALBERTA
INVESTMENT MANAGEMENT
CORPORATION, BRITISH COLUMBIA
INVESTMENT MANAGEMENT
CORPORATION, OMERS ADMINISTRATION
CORPORATION, AND PGGM
VERMOGENSBEHEER B.V.

**IBEW LOCAL 77 COMMENTS
REGARDING PUGET SOUND
ENERGY'S APPLICATION TO
SELL NON-CONTROLLING
INTEREST IN PUGET
HOLDINGS LLC**

FOR AN ORDER AUTHORIZING PROPOSED
SALES OF INDIRECT INTERESTS IN PUGET
SOUND ENERGY

1. International Brotherhood of Electrical Workers, Local 77 ("IBEW Local 77") submits these comments in response to the Commission's *Notice of Opportunity to File Written Comments*, dated September 21, 2018. IBEW Local 77 appreciates the opportunity to expand further on its concerns as expressed in the previously filed *Petition to Intervene*, dated September 19, 2018. The proposed transfer of Puget Sound Energy ("PSE") should be more closely scrutinized by the Commission.

1 2. IBEW Local 77 has been committed to improving the lives of working men and
2 women in the electrical trades for over 121 years while serving the people of Washington State.
3 IBEW Local 77 members work in various positions including: linemen, substation, metermen,
4 call center representatives, relay operators, hydro operators, tree trimmers, and many other
5 classifications. IBEW Local 77 represents over 800 full-time, part-time, and temporary
6 employees at PSE. IBEW Local 77 has a bargaining relationship with PSE dating back over
7 seventy (70) years. Over the course of these decades, it has been IBEW Local 77 members who
8 keep PSE running on a day-to-day basis. These members pride themselves on providing safe
9 quality service to customers and the public.

10 3. IBEW Local 77 is committed to serving PSE's customers. IBEW Local 77
11 members employed by PSE are charged with serving the public. Without customers, there are
12 no jobs for members. Likewise, IBEW Local 77 members want to ensure customer safety and
13 satisfaction. This goal, however, may be negatively impacted by the proposed transfer.

14 4. The proposed transfer will have a direct effect on IBEW Local 77 members
15 whose quality of work depends on their health, safety, and job satisfaction. Accordingly, IBEW
16 Local 77's work will have an attendant effect on PSE's customers, who expect the highest level
17 of customer satisfaction regarding their electrical needs. As a result, IBEW Local 77's concerns
18 about their employment directly affect the public interest and this proceeding.

19 5. Since changing ownership, PSE has increasingly allowed technology to drive its
20 responses to severe weather storm events. Because of changing climate, storm events occur
21 more frequently and last longer. Increasingly, PSE has elected to use out-of-classification,
22 untrained, and unskilled workers to respond to these events. At the same time, PSE has used
23 technology-based software to peg outages during storms. While this is a helpful tool, it lacks
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1 human intervention, contributing experience, and responsiveness. Utilizing untrained and out-
2 of-classification workers, combined with a computer program to respond to such storm events, is
3 dangerous for the safety of those individuals and the public. IBEW Local 77 is concerned that
4 the pattern of changes following a transfer in ownership will accelerate these unsafe trends.

5 6. IBEW Local 77 also represents PSE's Call Center employees. These employees
6 handle customer questions, outages, emergencies, and many other issues. The IBEW Local 77
7 Call Center employees are the public-facing representatives of PSE. Increasingly, PSE has
8 reduced Call Center staffing while increasing job duties. This naturally affects the public
9 because they telephone the Call Center to report issues and have questions answered. When the
10 Call Center is understaffed and existing employees are overworked, the customer suffers. IBEW
11 Local 77 is concerned that the proposed transfer could increase the pressures on Call Center
12 employees to increase profit at the expense of customer service and responsiveness, resulting in
13 customer dissatisfaction.

14 7. PSE has also moved toward electronic metering. Through this process meters are
15 read digitally; the meter is not actually observed by any person. In lieu of an employee seeing
16 the meter each month, the computer merely reports back its information electronically. This
17 system also allows PSE to remotely terminate a customer's service. IBEW Local 77 is
18 concerned about the safety of this process. If a meter is not observed by a person for an extended
19 period of time, there is no guarantee it is not damaged or been tampered with. This could
20 necessarily affect employees, the public, and customers. Whether the transfer in ownership will
21 accelerate this automation process is unclear, but should be a concern to the Commission.

22 8. There has been no indication what changes PSE will implement regarding power
23 generation. IBEW Local 77 is concerned about member and public safety. The Commission
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1 should ensure that any proposed changes to generation adequately consider the safety of IBEW
2 Local 77 members and the public.

3 9. The Commission may also use this opportunity to bring more transparency to
4 PSE's capital investments. There has been little transparency in which projects are categorized
5 as capital improvements rather than ordinary maintenance. Sufficient resources should be
6 devoted to maintaining the safety and reliability of PSE's infrastructure. Greater transparency in
7 this process would benefit both IBEW Local 77 members and the public.

8 10. IBEW Local 77 is also concerned that the transfer will lead the new and/or
9 changed ownership to demand higher profits at the expense of employee safety, health, and
10 welfare. IBEW Local 77 desires to maintain its current pension and other benefits. In the past,
11 new ownership has contributed to negative effects for members at PSE. This has led to a lesser
12 customer experience. IBEW Local 77 members strive to have satisfying and competitive jobs. It
13 is in PSE's best interest to have a well-trained and consistent workforce. This naturally affects
14 the public who interact directly with IBEW Local 77 members. Members are rightly concerned
15 that the transfer in ownership will lead to a reduced pension/retirement benefit. The Commission
16 should ensure PSE sufficiently funds and guarantees the pension benefit into the future.

17 11. Because of the proposed transfer, IBEW Local 77 is concerned about preserving
18 its contracted work. IBEW Local 77 and United Association Local 32 have a direct relationship
19 with PSE. IBEW Local 77 represents eight hundred (800) full-time, part-time, and temporary
20 workers employed directly by PSE. Unlike IBEW Local 77 and United Association Local 32,
21 the Washington and Northern Idaho District Council of Laborers ("Laborers") have no such
22 direct relationship with PSE. In a similar, but unrelated matter, the Laborers intervened with the
23 purpose of increasing work and changing the scope of subcontracted assignments. IBEW Local
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1 77 is concerned the Laborers may make a similar effort here. Importantly, the Laborers do not
2 represent any employees at PSE. To the extent that the Laborers wish to use the transfer
3 proceeding to acquire additional work opportunities, the Commission should prohibit such
4 requests. This is not an appropriate forum for the Laborers to acquire subcontracted work.


5 12. IBEW Local 77 members are currently, and have historically, been employed by
6 PSE to perform all electrical utility work. IBEW Local 77 members have likewise been
7 employed by subcontracts to perform construction and utility-related work. As the current CBA
8 is effective through March 2020, IBEW Local 77 members have been contracted as the exclusive
9 source of electrical-related labor for PSE, and for good reason. IBEW Local 77's well-
10 established training programs provide on-the-job training and specialized education that ensures
11 the safe quality of work performed by its members meets PSE's and the consumer's
12 expectations. The same cannot be guaranteed for other groups hoping to undercut the long-
13 standing relationship between IBEW Local 77 and PSE. The Commission should therefore
14 disregard any claimed interest that Laborers or any other non-signatory labor union may have in
15 the current matter.
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17 13. PSE has also demonstrated hostility, and sometimes retaliation, against IBEW
18 Local 77 members. Oftentimes, this retaliation has related to complaints about safety, working
19 conditions, and treatment of employees. The public is similarly affected by complaints related to
20 safety and employee working conditions. The union wants to ensure the transfer in ownership
21 does not increase these disturbing trends.

22 14. IBEW Local 77 wants to ensure the Commission considers its concerns before
23 making any decision to approve the Joint Applicants' transfer. Additional study and examination
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1 are necessary to this proceeding. IBEW Local 77 requests the Commission take its concerns into
2 consideration in making any decision.

3 DATED this 24th day of October, 2018.

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