

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

No. UE-151871 and UG-151872
(Consolidated)

**PUGET SOUND ENERGY'S
RESPONSE TO PUBLIC COUNSEL'S
AND COMMISSION STAFF'S JOINT
OBJECTION TO PUGET SOUND
ENERGY'S RESPONSE TO BENCH
REQUEST NO. 1 AND MOTION TO
STRIKE**

1 Puget Sound Energy (“PSE” or the “Company”) provides the following response to
Public Counsel’s and Commission Staff’s Joint Objection to PSE’ Response to Bench Request
No. 1 and Motion To Strike (“Joint Motion”) pursuant to WAC 480-07-375(4).

2 First, PSE’s Response to Bench Request No. 1, as filed, is responsive to questioning from
the Bench regarding the number of PSE customers that would meet the financial metrics and
be eligible for the lease service. As part of the colloquy around this request, PSE was asked to
provide “whatever process that is either in place today or will be in place under Schedule 75,
how many customers would be eligible”¹ Thus, PSE disagrees with the statement in the
Joint Motion that PSE’s response to Bench Request No. 1 was “unresponsive and
unauthorized.”²

3 Second, in preparing the response to Bench Request No. 1, the PSE Lease Solutions team
first learned that PSE had implemented, on a company-wide basis, new propensity to pay
screening criteria, which would have a positive impact on the eligibility for the leasing service.

¹ TR (Commissioner Jones): 430:14-17.

² Joint Motion at 1.

Generally speaking, the new propensity to pay criteria is beneficial to customers as it allows the Company to look more broadly at an individual customer's payment history and propensity to pay to inform the collections process. While this new propensity to pay criteria was not designed for the leasing service, it will have a positive impact on the eligibility criteria for the leasing service in addition to other benefits it provides to customers. Therefore, in an effort to be transparent and responsive to questions raised from the Bench, PSE included this new propensity to pay screening criteria in its response to Bench Request No. 1.

4 The Commission may exercise its discretion whether to consider the updated information in its deliberations in this case. PSE has no objection to the Commission considering the credit worthiness criteria that PSE and other parties relied on in preparing testimony and exhibits in this case; similarly, PSE has no objection to the Commission considering the updated propensity to pay criteria that the Company has more recently adopted. Both sets of screening criteria are reasonable and demonstrate that the majority of customers meet the financial criteria to participate in the leasing service.

5 There will be changes to PSE's business operations, from time to time, as is the case with any business enterprise. When the PSE employees working on the leasing service learned of the business process change relating to propensity to pay screening criteria, while in the process of responding to Bench Request No. 1, they provided this updated information to the Commission. In its response to Bench Request No. 1, PSE also provided the percentage of customer eligibility based on the credit worthiness screening criteria PSE used when developing the leasing service tariff sheets. The Commission may exercise its discretion in

determining whether to consider the updated financial eligibility data based on propensity to pay screening criteria along with the credit worthiness screening criteria as originally filed.

6 Respectfully submitted this 16 day of August, 2016.

PERKINS COIE LLP

By: 

Sheree S. Carson, WSBA No. 25349
David S. Steele, WSBA No. 45640
The PSE Building
10885 N.E. Fourth Street, Suite 700
Bellevue, WA 98004-5579
Telephone: 425.635.1400
Facsimile: 425.635.2400
Email: SCarson@perkinscoie.com
Email: DSteele@perkinscoie.com

Attorneys for Puget Sound Energy