

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**RULEMAKING TO CONSIDER  
PAPERLESS BILLING AND NOTICES  
FOR ELECTRIC AND NATURAL GAS  
CUSTOMERS**

DOCKET NO. U-100523

**INITIAL COMMENTS OF PUBLIC COUNSEL  
May 10, 2010**

1. The Public Counsel Section of the Washington Attorney General's Office (Public Counsel) submits the following comments for consideration in the above-captioned rulemaking proceeding. This rulemaking has the potential of impacting the breadth and effectiveness of communications between electric and natural gas utilities and their customers. While more and more commercial communication is occurring electronically, it is important to ensure that essential communications are carried out in the manner most likely to provide the essential information to customers. Thus, Public Counsel urges the Commission to proceed with caution.
2. As a general matter, Public Counsel does not object to electronic forms of notices, bills, or other customer communications. However, electric and natural gas utilities should be required to obtain affirmative, written consent of a customer before providing bills, notices, and other information solely in electronic form. Moreover, for certain key communications, paper

form should be required regardless of whether a customer has consented to electronic communications. These key communications include at a minimum: (1) notices of disconnection, (2) information regarding winter low-income payment program, and (3) notices of general rate case filings (including notice of public comment hearings).

3. Public Counsel also does not object to electronic submission of reports so long as Public Counsel, and/or any other interested party, can request and will be provided at no cost a paper copy from the utility.

4. Public Counsel thanks the Commission for the opportunity to participate in this rulemaking and looks forward to continued involvement as draft rules are considered.