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August 1, 2013

**VIA ELECTRONIC FILING**

Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

**ATTENTION: Records Center**

Re: Docket U-131087 – Inquiry to Consider Whether Changes to WAC 480-100-128(6)(k) and 480-90-128(6)(k) are Warranted

Cascade appreciates the opportunity to provide comments regarding possible changes to WAC 480-90-128(6)(k). Cascade supports a modification to the current rule as proposed (in red-line):

WAC 480-90-128(6)

(k) A utility representative dispatched to disconnect service ~~must~~ may accept payment of a delinquent account at the service address.<sup>5</sup> If cash is accepted the utility representative ~~but~~ will not be required to give change for cash paid in excess of the amount due or owing. The utility must credit any overpayment to the customer's account. The utility may charge a fee for the disconnection visit to the service address if provided for in the utility's tariff.

Cascade believes it should be at the discretion of the utility on whether or not to collect on a delinquent account at the door during a disconnect visit. Cascade supports its proposed language change from "must" to "may" with the following points:-

- Customers have substantially more options to pay bills than ever before such as mailing a payment, online payments, automatic payments via credit card payment over the phone and on line, and more access to payment locations.
- Currently nothing prevents the utility from just disconnecting service without an interface with the customer either at the premise or by remote disconnect (if the utility has the technology).
- Having the ability to not collect in the field means the utility has the ability to curb bad behavior. For example, there are customers that routinely pay only when faced with actual disconnection. Disconnecting after the repeated notices as provided for in this chapter of the rule demonstrates to customers that there are actual consequences to not

paying bills. For customers really unable to pay their bills, other options and avenues need to be pursued before the situation gets to the actual point of disconnection anyway.

- Customers who wait to pay until the service technician is at the door are not typically low income customers with financial hardships because they must pay an additional \$10 for making payment at the time of disconnection.

Cascade is proposing a second change to the rule to add clarification in order to meet Cascade's current operations. Cascade has interpreted the current language to mean as it is proposing. If cash is collected in the field then no change will be given. Cascade has not interpreted the current language to mean that cash must be accepted. This is demonstrated by Cascade's filing in Docket UG-042905 to its collection rules to only accept checks or money orders in the field. This filing was allowed to go into effect on January 1, 2005. Cascade's reasoning in support of the tariff change was the safety of its service technicians. Cascade is not aware of a single customer complaint about not collecting cash in the field during the last 8.5 years that the tariff has been in place.

Cascade, at a minimum, requests that either the rule be clarified on the point about cash or the Commission affirms Cascade's interpretation of the rule.

Cascade looks forward to the continued dialog at the workshop on August 15.

Please direct all correspondence or questions to me at (509)734-4593.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Parvinen", with a long horizontal line extending to the right.

Mike Parvinen  
Director, Regulatory Affairs