

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Formal Complaint of	DOCKET U-250858
ABDUL-RASHID: ABDUL-RAHMAN©,	ORDER 01
Complainant,	FINAL ORDER DENYING REVIEW OF NOTICE DECLINING TO INITIATE AN ADJUDICATION
v.	
PUGET SOUND ENERGY	
Respondent.	

**BACKGROUND**

- 1 On August 18, 2025, the Washington Utilities and Transportation Commission (Commission) received a formal complaint (Complaint) from Abdul-Rashid: Abdul-Rahman© (Abdul-Rahman©) against Puget Sound Energy (PSE). Abdul-Rahman© states in the Complaint that they are the executor for the Estate of Abdulrahman Abdulrashid (Estate).<sup>1</sup>
- 2 On November 11, 2025, Administrative Law Judge Ann Paisner issued a Notice Declining to Initiate Adjudicative Proceeding (Denial) pursuant to Washington Administrative Code (WAC) 480-07-305.
- 3 On November 14, 2025, Abdul-Rahman© filed a Response to Notice Declining to Initiate Adjudicative Proceeding (Response).
- 4 On December 24, 2025, the Commission issued a Notice of Opportunity to Respond.
- 5 Abdul-Rahman©’s Complaint provides details relating to three main allegations as follows:
  1. PSE deliberately misrepresented or manipulated the proper legal name of the customer account on billing statements, which should be the

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<sup>1</sup> Complaint at 1, 20; *see also*, Staff Memo Summarizing Staff’s Findings, Formal Complaint, Abdul-Rashid Against PSE, at 2 (Sept. 26, 2025) (hereinafter “Staff Memo”).

Estate, through an “artificial separation of components of names in an attempt to fabricate a debtor entity or create commercial joinder”;

2. PSE overcharged the account in an April 2025 bill for electric and gas usage that does not align with seasonal or historical averages; and
3. PSE improperly failed to rebut, honor, or record the Estate’s submission of “remittance coupons (Accepted for Value)” or “A4V” as lawful tender in payment of the amounts owed on the account in violation of accounting principles and fair billing standards.<sup>2</sup>

6 The Denial outlines Staff’s Memo and findings regarding the Complaint and denies Abdul-Rahman©’s request to initiate an adjudication because the Complaint failed to set forth the grounds for their formal complaint, the basis for Commission jurisdiction, and the Commission’s authority to grant the relief requested.<sup>3</sup> Specifically, the Denial found the Complaint did not set forth that PSE engaged in any impropriety or wrongdoing under law, regulation, Commission order, or tariff in PSE’s naming of the account associated with the Complaint.<sup>4</sup>

7 Further, in regard to the Complaint’s claims regarding payment, the Denial found the Commission does not regulate specific forms of payment a utility may or may not accept or whether the estate may be named as a customer.<sup>5</sup> The Denial also included discussion that Commission rules do not require historical usage to be used for utility billing over actual metered usage.<sup>6</sup>

8 In his Response, Abdul-Rahman© writes “the Estate must respectfully correct several material inaccuracies and omissions in the investigative record that directly affect the jurisdictional findings and decision not to initiate adjudication.”<sup>7</sup> Abdul-Rahman© offers a series of perceived needed corrections, arguments, and demands. First, the Response states the Staff Memo contains an incorrect property determination and refers to a Statutory Warranty Deed recorded on October 9, 2025, transferring property ownership from Abdul-Rahman© and Getachew Kewser Kassa to the estates of each individual.<sup>8</sup>

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<sup>2</sup> Notice Declining to Initiate Adjudicative Proceeding, at 1 (hereinafter “Denial”); *citing* Complaint at 2-9, 12-15, 20-30.

<sup>3</sup> Denial, at 4.

<sup>4</sup> Denial, at 4-5.

<sup>5</sup> Denial, at 5.

<sup>6</sup> Denial, at 5.

<sup>7</sup> Response, at 1.

<sup>8</sup> Response, at 2.

The Response alleges this materially impacted the Denial on standing.<sup>9</sup> Next, the Response alleges that the Staff Memo and Denial failed to include the Estate's attempts to enter a bilateral commercial contract with PSE.<sup>10</sup>

9 The Response next states that PSE updated the account associated with the property to include the Estate as the named customer, zeroed out the account, and then "resurrected a non-existent debt" which lacked a billing event, meter justification, and conflicted with PSE's internal system.<sup>11</sup> The Response then alleges that PSE sold the debt during an active dispute, which the Response alleges violates RCW 19.16, 15 U.S.C. § 1692c, 1692e, and WAC 480-100-128(12).<sup>12</sup>

10 Next, the Response alleges there is no written meter testing documentation for the electric meter test that was conducted and the natural gas meter test that was declined by Abdul-Rahman©.<sup>13</sup> The Response then provides a docket number for a Pierce County Superior Court case to confirm Abdul-Rahman©'s identity and capacity as executor of the estate and a statement the estate is conducting an internal audit due to inconsistencies in "utility billing and creditor handling of the public transmitting utility accounts."

11 The Response concludes by asking for the Commission to reinstate an adjudication or turn over the full investigative file and supporting documentation within ten days.

12 No entity responded to the Commission's Notice permitting responses.

### DISCUSSION

13 The Commission construes pleadings and motions liberally "with a view to effect justice among the parties."<sup>14</sup> "The commission will conduct any administrative review of a decision not to conduct an adjudicative proceeding using the same procedures applicable to review of initial orders set forth in WAC 480-07-825." Given the requested relief, we interpret the email sent by Abdul-Rahman© as a petition for administrative review. WAC 480-07-825 provides "[a] party may challenge any finding of fact, conclusion of law, remedy, or result in an initial order by petitioning for administrative review. A party also

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<sup>9</sup> Response, at 2.

<sup>10</sup> Response, at 2.

<sup>11</sup> Response, at 2-3.

<sup>12</sup> Response, at 3.

<sup>13</sup> Response, at 3-4.

<sup>14</sup> WAC 480-07-395(4).

may petition for administrative review to challenge the reasons stated in support of any result reached in an initial order.”

14 We review petitions for administrative review *de novo*.<sup>15</sup>

15 In reviewing the decisions reached in an Initial Order, the Commission may exercise all discretion available to the presiding officer, except as limited by law.<sup>16</sup> In this review, the Commissioners personally consider the whole record or such portions as the parties cite in post-hearing pleadings.<sup>17</sup>

### ***Decision***

16 Abdul-Rahman© asks the Commission to consider or correct several alleged factual mistakes, misinterpretations, or omissions, which Abdul-Rahman© argues materially impacted the decision to not initiate an adjudication.

17 We first note, that some of the alleged factual inconsistencies are things that occurred after the Complaint was filed.<sup>18</sup> Others are simply not contained in the Complaint.<sup>19</sup> “A formal complaint must be in writing and must clearly and concisely set forth the grounds for the formal complaint, the relief requested, and the commission's jurisdiction to commence an adjudication and grant the requested relief.”<sup>20</sup> Said differently, a Complaint must clearly set forth the facts and circumstances for which an alleged violation has occurred. Inherent to this is that all facts upon which a Complaint is based must be set forth. It is the burden of the Complainant to allege facts sufficient to show that an actual case and controversy exist. Inclusion of facts not plead in the Complaint in the Response is improper, and an amended complaint should have been filed.

18 Next, the Complaint must state the relief that is requested. Here, the requested relief is to accept a form of tender not accepted by PSE, to require full accounting, require PSE to

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<sup>15</sup> RCW 34.05.464(4); *City of Kennewick v. Port of Benton*, Order 04, Den. Pet. for Recons., Pet. for Stay, and Pet. for Reh'g (June 24, 2014).

<sup>16</sup> RCW 34.05.464(4).

<sup>17</sup> RCW 34.05.464(5) (“The reviewing officer shall personally consider the whole record or such portions of it as may be cited by the parties.”) *See also* *Bowing v. Board of Trustees*, 85 Wn.2d 300, 534 P.2d 1365 (1975) (finding the statutory term “personally review the record” does not mean to “read” the record.”).

<sup>18</sup> *See*, Response, at 2 (discussing the transfer to the estate through warranty deed).

<sup>19</sup> *See, e.g.*, Response, at 3 (discussing attempts to contract with PSE and the zeroing out of an account).

<sup>20</sup> WAC 480-07-370(1)(b).

send Abdul-Rahman©'s bills to the Commission, and suspend collection activity for unpaid balances. Again, the relief requested must be within the realm of relief the Commission has statutory authority to provide. None of the actions requested are within the Commission's authority. For instance, the Commission does not receive bills on behalf of customers, nor does it pay said bills,<sup>21</sup> nor does the Commission generally enforce violations of mail fraud or the Uniform Commercial Code. Finally, the Complaint must set forth the Commission's jurisdiction to adjudicate the claims. The Complaint primarily cites to law the Commission has no jurisdiction to enforce, and where Commission statutes or rules are provided, no facts are alleged to support a claim that PSE has violated those provisions of law. Specifically, the Response alleges that WAC 480-100-128(12) was violated when PSE apparently sold its bad debt on this customer account to a collections agency. We assume the factual components did occur in our review, however, WAC 480-100-128(12) does not exist. There does not appear to be any prohibition on a utility doing as PSE has done here. Further, WAC 480-100-128(9) and (10) state as follows:

**(9) Payments at a payment agency.** Payment of any past-due amounts to a designated payment agency of the utility constitutes payment when the customer informs the utility of the payment and the utility has verified the payment. The utility must promptly verify the payment upon notification from the customer.

**(10) Remedy and appeals.** A utility may not disconnect service while the customer is pursuing any remedy or appeal provided by these rules or while engaged in discussions with the utility's representatives or with the commission. Any amounts not in dispute must be paid when due and any conditions posing a danger to health, safety, or property must be corrected. The utility must inform the customer of these provisions when referring the customer to a utility supervisor or to the commission.

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<sup>21</sup> While WAC 480-100-128(4)(k) does state that “[a]ny customer may designate a third party to receive a disconnection notice or notice of other matters affecting the customer's service. The utility must offer all customers the opportunity to make such a designation,” the Commission is not such an agency and does not accept bills on behalf of customers. Such a circumstance generally arises from “the utility is providing service to a nursing home, boarding home, adult family home, group care facility, intermediate care facility for individuals with intellectual disabilities, intensive tenant support residential property, crisis residential center for children, or residential care facility licensed or certified by the department of social and health services (DSHS), the utility must provide a notice of pending disconnection to the DSHS secretary and to the customer. Upon request of the DSHS secretary or designee, the utility must delay the disconnection for at least five business days past the original disconnection date to allow DSHS to take the necessary steps to protect the interests of the patients residing at the facility.” WAC 480-100-128(4)(j)(ii).

- 19 Together, these provisions prohibit disconnection during an ongoing dispute – which has not been alleged to have occurred – and contemplate that payments can be made to a third party payment agency with notice to the utility.
- 20 Even if we interpret the Response as an amended Complaint, and consider all of the alleged facts are true, the reasoning provided in the Denial for the Commission’s lack of jurisdiction to provide the relief sought and the explanation as to why the Complaint fails to state a claim still holds true. Accordingly, we adopt the Denial’s reasoning as our own and find that Administrative Review and the initiation of an adjudication in this matter should be denied.

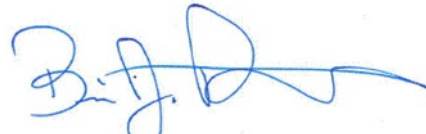
**ORDER**

THE COMMISSION ORDERS THAT:

- 21 (1) Abdul-Rashid: Abdul-Rahman©’s Petition for Administrative Review is DENIED.

DATED at Lacey, Washington, and effective February 13, 2026.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION



BRIAN J. RYBARIK, Chairman



ANN E. RENDAHL, Commissioner



MILTON DOUMIT, Commissioner

**NOTICE TO PARTIES: This is a Commission final order. In addition to judicial review, administrative relief may be available through a petition for reconsideration, filed within 10 days of the service of this order pursuant to RCW 34.05.470 and WAC 480-07-850, or a petition for rehearing pursuant to RCW 81.04.200 and WAC 480-07-870.**