



**Re: In the Matter of Docket No. U-200281 – Front and Centered Response to Public Counsel’s Petition for Reconsideration and Petition for Stay**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

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06/28/21 13:41  
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UTIL. AND TRANSP.  
COMMISSION

June 25, 2021

Dear Mark L. Johnson:

In support of Public Counsel’s petition, Front and Centered urges the Commission to reconsider Order #03 and extend the moratorium on utility disconnections for nonpayment through September 30. The Order was issued on the basis of erroneous findings regarding the adequacy of utility outreach activities and Commission protective measures to secure equitable access to a vital service. The lasting impacts of systemic failures to address disparities in energy access requires additional time and attention to address without wrongfully defaulting to a false narrative where disconnections and notices thereof are benevolent and even morally obligatory. A utility disconnections moratorium is not a permanent solution, but it is a necessary part of one.

Please let us know if you have any questions as you reconsider the Order and how to appropriately support utilities and customers in the wake of the pandemic.

Sincerely,

Mariel Fernandez Thuraisingham  
Clean Energy Policy Lead  
Front and Centered  
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