



WASHINGTON WATER SERVICE

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July 7, 2021

Mark Johnson
Executive Director and Secretary
Utilities and Transportation Commission
Via electronic delivery

RE: Docket # U-200281 – Washington Water Service Company

Dear Mr. Johnson,

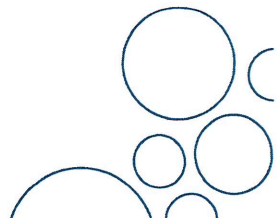
On June 25, 2021, the Washington Utilities and Transportation Commission (“UTC”) served a copy of UTC’s Staff Water Utility Options COVID-19 Recovery Appendix B (“Appendix B”) which sets forth a COVID-19 recovery plan for water utilities under Docket U-200281. Regulated water companies were given the opportunity to provide feedback in the form of written comments by July 7, 2021. Washington Water Service Company (“WWSC”) supports UTC’s efforts to develop a COVID-19 transition plan for the water industry and hereby submits the following comments for consideration.

Resumption date and disconnection moratorium (Section A, Item 3 of Appendix B)

Since Appendix B was served, Governor Inslee issued proclamation 20-23.16 on July 2, 2021, to extend the State of Emergency and continue the prohibition of disconnecting, refusing to reconnect, and charging late fees until termination of the State of Emergency or 11:59 p.m. on September 30, 2021, whichever comes first. Accordingly, WWSC recommends that the Resumption Date in Appendix B be modified from July 31, 2021 to October 1, 2021 to align with Governor Inslee’s proclamation. Consistent with Section A 4e of the UTC Staff Third Revised Term Sheet COVID-19 Response Appendix A guidelines issued on July 2, 2021, for electric and natural gas utilities, WWSC requests that the disconnection procedures outlined in WAC 480-110-355 and the utility tariff resume on October 1, 2021. Establishing a similar disconnection process for energy and water utilities will prevent confusion for customers requiring payment assistance in both sectors.

Should the requirement to notify Commission Staff of disconnection after the Resumption Date move forward, WWSC proposes that companies be required to notify Commission Staff prior to disconnecting any customer for debt incurred between March 1, 2020 and September 30, 2021. Shut-offs for any debt after September 30, 2021, would not require notification to Commission

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Staff. Instead, these situations would employ pre-COVID-19 non-payment and shut-off procedures. WWSC believes this approach will provide the relief needed for those facing financial hardships due to the pandemic and facilitate the return to standard operating protocol.

Missing of payments (Section D, Item 2b)

Item 2b of Section D currently states that missing two consecutive payments does not constitute default on a payment plan. This leaves the criteria for default vague and open for interpretation or ill use. For example, it is unclear if missing two consecutive payments, followed by one payment and two more consecutive months of missed payment would result in default. Rather than indicate what a default is not, WWSC recommends the language be modified to define the conditions for which default would occur (i.e. missing three payments) and thereby trigger the shut-off process.

Cost recovery (Section F)

In addition to the principles UTC Staff recommends for COVID-19 deferred accounting, WWSC notes that federal programs, such as the Consolidated Appropriations Act of 2021 (“CAA”) and the American Rescue Plant Act of 2021 (“ARPA”) might be available to provide assistance for utility customers with overdue bills. WWSC therefore recommends that any efforts to conduct shut-offs or write off debt for debt incurred between March 1, 2020 and September 30, 2021 be made after available aid, if any, is applied.

Conclusion

WWSC remains committed to assisting customers financially impacted by COVID-19. For the reasons stated above, WWSC respectfully asks UTC to incorporate its remarks in the final draft of Appendix B.

Kind Regards,



Matthew Brown, P.E.
General Manager, Washington Water

