

November 2, 2009

Mr. David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

RE: Docket Nos. UE-072300 and UG-072301; Application for Approval of Amendment to Service Quality Index Benchmark: Disconnection Ratio

Dear Mr. Danner,

The Energy Project is responding to the PSE filing to propose to revise the Service Quality Index benchmark for the Disconnection Ratio to an annual benchmark of 0.038 disconnections per customer when the WUTC disconnection policy would permit service curtailment for non-payment of amounts due. The Proposed Order #14 of the WUTC to modify this benchmark from 0.030 is of concern to us and the low-income households we represent before the Commission.

Though we understand the Company's need and interest in raising this benchmark due to the economic upheaval of our times, we also are too familiar with the same causal impact the economy has had directly on our low-income clients and the growing number of households now in poverty due to this economic crisis. To propose a fix for the utility without accommodating the needs of the ratepayers directly affected is out of balance. We have greatly appreciated PSE's HELP program to assist low-income households in their service area, and the recent increase in that budget. Unfortunately, there are the great majority of low-income ratepayers in PSE's service area that cannot benefit from these funds because the amount budgeted for the program is exhausted before they can participate. Then, too, we believe there are most likely a high number of households who are just above eligibility for the HELP program who will be affected as well.

The Energy Project is interested in participating with the appropriate stakeholders to consider alternative approaches before raising the bar on the benchmark. We do not have enough information and are therefore not convinced that all alternative approaches, which we believe were a condition of the original filing, have been mobilized or exhausted.

Therefore, we are recommending that the WUTC adopt a short term lifting of the benchmark to 0.038 conditioned upon the convening of a work group sanctioned by the

Commission to review this issue. This work group should convene and complete its work and report to the Commission within 6 months of the approval of this order. Based on the findings of the report the Commission could adopt a final order.

Respectfully submitted,

Chuck Eberdt
Director
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