

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	DOCKET UG-210931
Puget Sound Energy	ORDER 01
Seeking Exemption from the Provisions of WAC 480-90-178(5)(a) Relating to Billing Corrections	GRANTING EXEMPTION

BACKGROUND

- 1 On December 3, 2021, Puget Sound Energy (PSE or Company) filed with the Washington Utilities and Transportation Commission (Commission) a petition requesting an exemption from WAC 480-90-178(5)(a) (Petition).
- 2 WAC 480-90-178(5)(a) requires natural gas companies to issue a corrected bill upon finding that an underbilling or overbilling occurred. The bill must be issued within 60 days from the date the utility discovered that an account had been underbilled or overbilled. Corrections to accounts that have been underbilled are limited to six months from the date the error occurred.
- 3 In its Petition, PSE seeks an exemption from the requirement to issue a corrected bill limited to six months from the date of the error occurred to allow the Company to correct 301 underbilled accounts. Absent the exemption, PSE would have to manually adjust 215 accounts to capture the six-month period from the date the error occurred. PSE further explains that creating the detailed letters required by WAC 480-90-178(6) would take several months to complete, which would create a poor customer experience. Accordingly, PSE seeks permission to correct the 301 billing errors by applying the underbilled charges to each customer’s usage that occurred in the six months between April and September 2021. This would allow PSE to send a detailed notification letter simultaneously to all 301 customers explaining the bill adjustment prior to receiving the bill.
- 4 On January 11, 2022, PSE amended its Petition to request an exemption from the requirement that the Company issue a corrected bill within 60 days from the date the utility discovers the error. Due to the complicated billing collection process, PSE requests an extension of the December 31, 2021, deadline to issue corrected bills.

5 Commission staff (Staff) reviewed the request and has been in communication with the
Company. Staff recommends that the Commission grant PSE's request for exemption
from WAC 480-90-178(5)(a) because the exemption will benefit customers and reduce
the Company's administrative burden.

DISCUSSION

6 Pursuant to WAC 480-07-110, the Commission may, in response to a request or on its
own motion, grant an exemption from its own rules when consistent with the public
interest, the purposes underlying regulation, and applicable statutes. The Commission
applies this same standard when considering exemptions from its rules for natural gas
companies.¹

7 The Company requests an exemption from WAC 480-90-178(5)(a), which requires that a
natural gas utility

must issue a corrected bill upon finding that an underbilling or
overbilling occurred as a result of a meter failure, meter
malfunction, meter with unassigned energy usage, or any other
situation where energy usage was not billed or was
inaccurately billed. The utility must use the rates and rate
schedule in effect during the billing period(s) covered by the
corrected bill. The utility must issue the corrected bill within
sixty days from the date the utility discovered that an account
had been underbilled or overbilled.

8 We agree with Staff that the exemption should be granted. We find that PSE's request is
reasonable and will ensure that the Company can address the billing corrections faster
and with clearer, more understandable explanations for customers, thereby reducing
customer uncertainty. The requested exemption will also reduce the administrative
burden of processing the corrected bills. We appreciate PSE's investigation of the 301
underbilled accounts and its efforts to work with Staff to reach a satisfactory resolution.
Using the alternate six-month period proposed by PSE may benefit customers who were
under billed by using their summer gas usage to calculate the corrected bills instead of
presumably higher winter gas usage.

9 We also find that PSE's request for additional time to issue the corrected bills is
reasonable, recognizing that the Petition was filed prior to the 60-day deadline and the

¹ WAC 480-90-008.

Company could not move forward until this matter was heard and decided. Accordingly, grant the Company's Petition for exemption and allow PSE to issue corrected bills as described in the Petition within 30 days of the date of this Order.

FINDINGS AND CONCLUSIONS

- 10 (1) The Commission is an agency of the State of Washington vested by statute with the authority to regulate rates, rules, regulations, practices, accounts, securities, transfers of property and affiliated interests of public service companies, including gas companies.
- 11 (2) PSE is engaged in the business of providing gas services within the state of Washington and is a public service company subject to Commission jurisdiction.
- 12 (3) PSE is subject to WAC 480-90-178(5)(a), which requires gas companies requires natural gas companies issue a corrected bill upon finding that an underbilling or overbilling occurred. The bill must be issued within 60 days from the date the utility discovered that an account had been underbilled or overbilled. Corrections to accounts that have been underbilled are limited to six months from the date the error occurred.
- 13 (4) Under WAC 480-90-008, the Commission may grant an exemption from the provisions of any rule in Chapter 480-90 WAC, if consistent with the public interest, the purposes underlying regulation and applicable statutes.²
- 14 (5) This matter came before the Commission at its regularly scheduled meeting on January 27, 2022.
- 15 (6) After reviewing PSE's petition filed in Docket UG-210931 on December 3, 2021, as amended on January 11, 2022, and giving due consideration, the Commission determines that the exemption is reasonable and should be granted.

² See WAC 480-07-110.

ORDER

THE COMMISSION:

- 16 (1) Grants Puget Sound Energy's petition for exemption from WAC 480-90-178(5)(a) after the effective date of this Order.
- 17 (2) Retains jurisdiction over the subject matter and Puget Sound Energy to effectuate the provisions of this Order.

The Commissioners, having determined this Order to be consistent with the public interest, directed the Secretary to enter this Order.

DATED at Lacey, Washington, and effective this January 27, 2022

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

AMANDA MAXWELL
Executive Director and Secretary