



April 17, 2024

### **Via Electronic Filing**

Attn: Jeff Killip, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
P.O. Box 47250  
Lacey, WA 98503

**Re: NW Energy Coalition's Comments on Puget Sound Energy's (PSE) Proposal to Increase the Annual Cap for Program Year 2023-2024 in Schedule 129 of Tariff No. WN U-60 (Docket UE-240194/UG-240195)**

Dear Director Killip:

The NW Energy Coalition ("NVEC" or "Coalition") appreciates the opportunity to file comments. **We support PSE's proposal to increase the annual cap for the current program year (2023-2024) of their Home Energy Lifeline Program (HELP).**

Over the past year, NVEC has collaborated diligently with PSE and other members of PSE's Low-Income Advisory Committee (LIAC) to redesign PSE's low-income bill assistance programs as laid out in Final Order 24 in PSE's 2022 general rate case (Docket UE-220066/UG-220067).<sup>1</sup>

Consistent with the rate case order, PSE implemented its new Bill Discount Rate (BDR) program<sup>2</sup> on October 1, 2023 and is currently working with its LIAC to implement a new arrearage management program (AMP) by October 1, 2024.

The new BDR program and pending AMP innovatively change the way that utilities in Washington and across the nation can meaningfully address energy affordability for their

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<sup>1</sup> Please see Condition 37 on pages 21-23 (Section G. Low Income Issues) of Final Order 24 in UE-220066. [UTC Case Docket Orders Page | UTC \(wa.gov\)](#)

<sup>2</sup> [PSE | Bill Discount Rate](#)

customers. Together in combination with other bill assistance that PSE customers may receive— via PSE HELP, PSE payment plans, the Salvation Army Warm Home Fund, and the federal LIHEAP program— PSE customers are intended to have a household energy burden no higher than six percent. This more personalized approach to designing and providing bill assistance creates the opportunities customers need to have affordable bills month after month and better enables them to manage any arrearages they incur.

As we have recently surpassed six months of program implementation, PSE has worked to achieve substantial enrollment into the program. The Company is making steady progress towards its goal of enrolling 70,000 customers, as ordered by the Commission in Order 01 of Docket UG-230470. We believe the Commission should ensure that sufficient funding is available to meet PSE's vulnerable customers' needs.

PSE collaborated with the LIAC— which includes the Company and representatives from Community Action Agencies, The Energy Project, Public Counsel, and the NW Energy Coalition— to develop this proposal. NWEAC acknowledges that this collaboration aligns with condition 37(f) of Order 24 in Dockets UE-220066/UG-220067.

During LIAC collaboration, PSE presented data that showed that the enhanced bill assistance programs have been successful in enrolling record numbers of customers. We believe that in order for PSE to continue to expand the reach of its bill assistance programs and achieve its goal of enrolling 70,000 customers, an increase to the annual cap for this program year is needed.

We conclude in noting that this request is reasonable as the need has been demonstrated and the Commission has approved similar mid-program year requests for PSE's peer utilities in the past, including for Cascade Natural Gas in Docket UG-230551 and Northwest Natural Gas in Docket UG-230614.

Thank you for considering our comments.

Respectfully submitted,

*/s/ Charlee Thompson*

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