

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

---

DOCKET UE-240004 and UG-240005  
*(Consolidated)*

EXHIBIT SNS-6

PSE Response to TEP DR 52

August 6, 2024

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-240004 & UG-240005  
Puget Sound Energy  
2024 General Rate Case**

**THE ENERGY PROJECT DATA REQUEST NO. 052:**

**RE: Credit and Collections**

Please describe in detail PSE’s current policies and practices with regard to disconnection of customers eligible for disconnection of electricity and natural gas service, including, but not limited to:

- A. What policies and procedures—including state statutes, state regulations and internal policies—does PSE follow when deciding whether to disconnect a customer?
- B. Is PSE organizing or prioritizing customers for potential disconnection according to phases or groups? If yes, please explain in detail, including how customers are assigned to different groups or phases.
- C. Is the disconnection approach different for PSE low-income customers, e.g., are low-income customers placed in a specific group or phase for disconnection?
- D. Is PSE using Experian or other third-party data to identify low-income customers for placement in a group or phase for disconnection?
- E. Does PSE’s response to parts B through D differ from that provided as PSE’s Response to TEP DR 038 in Dockets 220066-67? If so, how does it differ?

**Response:**

Puget Sound Energy (“PSE”) objects to The Energy Project Data Request No. 052 to the extent it requests information that is publicly available or obtainable from some other source that is more convenient, less burdensome, or less expensive. PSE also objects to this request to the extent that it calls for a legal conclusion or opinion.

Notwithstanding these objections, and subject thereto, PSE responds as follows:

- A. The policies and procedures that PSE follows when deciding whether to disconnect a customer are as follows: Schedule 80; Gas Rule No. 9; chapter 480-90 WAC; chapter 480-100 WAC.

PSE also continues its current process of monitoring daily weather forecasts to determine which service territories will experience extreme weather and therefore be exempt from disconnection for non-payment. This includes looking at the following day's forecast 24 hours in advance and halting credit disconnections for non-payment for any day where the daily average temperature is at or below 32°F, at or above 90°F, or where any inclement weather warning has been issued by the National Weather Service.

Lastly, PSE has an internal policy and procedure where it may halt disconnections for non-payment in any part of its service territory experiencing an event such as a power outage where PSE has opened its Emergency Coordination Center, wildfires, and/or when wildfires have increased the Air Quality Index to a level that presents health concerns to PSE employees or PSE's communities.

- B. PSE segments the collections ("dunning") process (the process prior to disconnection) based on a customer's Total Solutions Incorporated ("TSI") propensity to pay score, and by a past due arrearage limit. However, if a customer enters the dunning process, they are then treated the same throughout the process up to disconnection. Please see Attachment A to PSE's Response to The Energy Project Data Request No. 052 for the current phased approach to dunning. The customer counts and dollars past due in the attachment are subject to change.
- C. During the pandemic, PSE removed low-income customers from the dunning process, as there was a significant amount of funding available through multiple programs to manage customer arrearages. In the current phased approach to dunning included as Attachment A, low-income customers who meet the past due arrearage limit move back into the dunning process starting in Phase 2.
- D. PSE does not use Experian or other third-party data to identify low-income customers for placement in a group or phase for disconnection.
- E. PSE's responses to B through D above differ from PSE's responses to The Energy Project Data Request No. 038 in Dockets 220066-67 A through C in the following ways:
- The response to (B) adds the current phased approach to dunning as an attachment.
  - The response to (C) adds that low-income customers are included in phase 2 of the current phased approach.
  - The response to (D) was updated to reflect current practice.

**ATTACHMENT A to PSE's Response to  
The Energy Project  
Data Request No. 052**

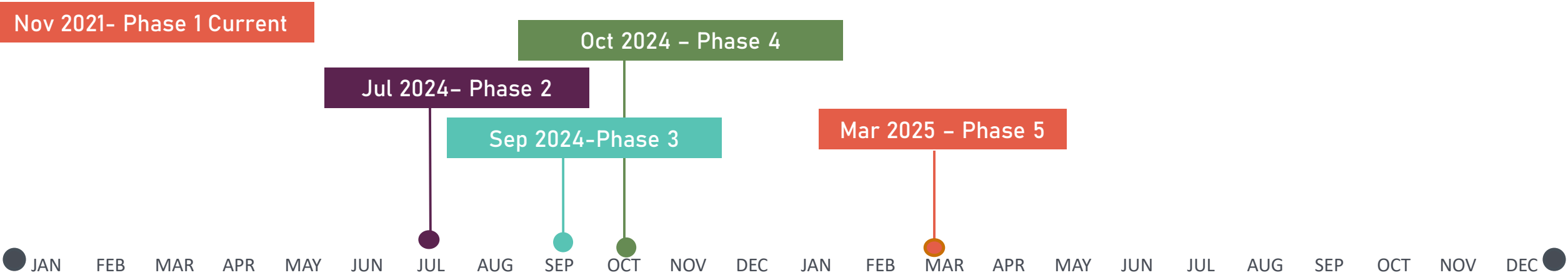
---

# Proposal: Dunning Timeline (July 2024)

---



# DUNNING TIMELINE PROPOSAL



2024 JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC 2025

PHASE #	\$ THRESHOLD	INCOME THRESHOLD	EST NEW CUSTOMERS DUNNING*	\$ PAST DUE*	EST NEW CUSTOMERS REACHING DISCONNECT QUEUE*	EST NEW CUSTOMER DISCONNECTS FOR NON-PAYMENT*
Phase 1 (Current)	>\$1,000	above 200% FPL	27,184	\$ 58,608,991	11,417	1256
Phase 2	>\$1,000	below 200% FPL ("SP")	14,039	\$ 33,449,833	5,896	649
Phase 3	\$750 - \$999	above and below 200% FPL	20,588	\$ 17,896,683	8,647	951
Phase 4	\$500 - \$749	above and below 200% FPL	27,978	\$ 17,253,093	11,751	1293
Phase 5	\$250 - \$499	above and below 200% FPL	48,693	\$ 17,538,969	20,451	2250

<sup>1</sup>Tentative timeline, subject to change based on customer behavior, CCC calls and disconnection queue volume.  
<sup>2</sup>Estimated customers and dollars past due are based on arrearages as of 4/30/2024 and include known and estimated customers removed from dunning.  
<sup>3</sup>PSE expects this number to change as customers pay, enter into a payment plan, or seek assistance.  
<sup>4</sup> Phase dunning program ends at phase 5 at \$250 per UE-220066 et al - Order 32 18 Granting Petition to Amend Final Order 24 10