

Exhibit No. \_\_\_ (RP-12C)  
Docket: U-110808  
Witness: Rayne Pearson  
REDACTED VERSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET U-110808

EXHIBIT TO  
REBUTTAL TESTIMONY OF

Rayne Pearson

STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

*Pages 6-15 of Attachment A to  
PSE's response to Public Counsel's Data Request No. 029*

July 6, 2012

*Confidential Per Protective Order  
Redacted Version*

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**From:** Jackson, Aundrea  
**Sent:** Thursday, May 19, 2011 9:57 AM  
**To:** Williams, Felicia; McClenahan, Kristina  
**Subject:** FW: 26 Account Review - Corrections Taken

Got a minute to review this at 10:30?

*Aundrea Jackson*  
Manager, Customer Access Center  
Puget Sound Energy  
O: 425-424-6596  
C: 425-417-6118

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**From:** McClenahan, Kristina  
**Sent:** Thursday, May 19, 2011 9:47 AM  
**To:** Jackson, Aundrea; Archuleta, Gilbert  
**Cc:** Booker, Sarah  
**Subject:** 26 Account Review - Corrections Taken

Hi there,

I have attached the updated version explaining where we are at in the correction process. I am not sure if Action Required is the correct name of this field any longer. Let me know if you have any questions.

Thank you,

6/25/2012

Kristina McClenahan  
Supervisor Customer Services  
Customer Access Center  
PUGET SOUND ENERGY  
425-424-6757 or 81-6757  
[www.pse.com](http://www.pse.com)

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ID	Acct	Name	Payment Type	Analysis	Action Required
A		[REDACTED]	PSE Help Multi-Service Center	<p>If current process had been in place when this disconnect happened the move in date would have been 10/13/09. The pledge of \$878.00 would apply towards deposit + reconnect fee and charges forward leaving a prior balance of \$994.94. Based on past usage the account would have a credit and 3/4/10 \$13 visit fee would be waived. 3/26/10 pledge of \$263.00 would add to active product credit. 8/2/10 disconnect would not have occurred, and prior obligation on that product not necessary, which resulted in bad debt of \$269.23. Customer payments 3/4/10 \$260.00, 6/1/10 \$202.61, 8/3/10 \$178.00 would have also applied to active product assignment, avoiding 8/2/10 disconnect.</p> <p>If our current process had been in place when this disconnect happened the move-in date would have been 9/30/09. The pledge of \$964.00 would apply towards deposit + reconnect fee and charges moving forward. At that time a credit of \$653.00 would be on new product and prior obligation balance of \$757.11. Customer made 6 payments totalling \$1076.08 which would have paid off total prior obligation debt. 3 pledges totalling \$2677.00 received and would have applied towards future charges.</p>	<p>Pledge moved on 11/11/09 to account 777370535 as [REDACTED] primary. Prior Balance in Collections due to customer move out 12/15/09, no contact from customer. No further action needed.</p> <p>Corrections in process: Prior obligation inserted for 10/26/09 disconnect and pledge posted to new product. Pulled back prior obligation balances from collection agency. Customer payments moved to prior obligation balances. Statement reviewed and customer to be contacted with explanation and offered arrangements.</p> <p>Prior obligation inserted for 10/21/09 disconnect and all payments redirected to pay off prior obligation debt. Pledges moved to cover new product assignment. Statement is being reviewed for accuracy, contact to customer in process to explain corrections.</p>
B		[REDACTED]	PSE Help Opportunity Council		
C		[REDACTED]	PSE Help Kiteap Community Resources		

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D	Pledge Review	<p>[REDACTED]</p> <p>PSE Help Kitsap Community Resources</p>	<p>Account was not processed as prior obligation as originally intended. Customer was offered prior obligation for reconnection on 10/29/09 for amount of \$1360.33 and then received PSE Help Pledge of \$1000.00. Customer then advised additional \$360.33 necessary for reconnection- customer paid that amount. If our current process had been in place, the move-in date would have been 10/3/09. The pledge of \$1000.00 would apply towards deposit + reconnect fee and charges moving forward. The customer now has a choice to allow payment of \$360.33 to pay towards then prior obligation debt of \$1550.37 or towards future charges. Customer made 6 payments totalling \$3672.70, including \$360.33- which would have paid off prior obligation debt. Additional pledge of \$1000.00 awarded 2/2010.</p>	<p>Prior obligation inserted for 10/29/09 disconnect and all payments redirected to pay off prior obligation debt. Pledges moved to cover new product assignment. Statement is being reviewed for accuracy, contact to customer in process to explain corrections.</p>
E	Pledge Review	<p>[REDACTED]</p> <p>Puyallup Indian Tribe</p>	<p>If our current process had been in place when this disconnect happened the move in date would have been 10/5/09. The pledge of \$72.27 would apply to the charges forward of \$1,689.46 because a prior was processed on 8/4/10, however this prior may not have been necessary if we followed our current process. Payments received including the pledge from 10/5/09 until the prior of 8/4/10 total \$2,057.88. We charged 7 visits at \$13.00 = 91.00 which we would need to remove because the account would have been current. However, the installment arrangement for the prior balances would have been - \$572.27 minus deposits held (\$262) would be \$310.27. With payments received during that time the installment would be paid in full and a credit of \$58.15 on the account to move forward toward the new prior processed in August 2010 but would not have been necessary.</p>	<p>Corrections in process, prior obligation inserted for 10/09 disconnect, reversal of August 2010 prior obligation. Pledge moved to cover new product assignment. Statement reviewed for accuracy and once complete customer contacted with detailed explanation.</p>
F	No Pledge	<p>[REDACTED]</p> <p>Personal Payment of \$300.00</p>	<p>Customer disconnected for \$550.00 for usage and Balance Transfer from previous address [REDACTED] Disc on 10/23/09. On 10/28/09 prior was offered. Customer paid \$300.00 which was more than he was quoted for prior obligation.</p>	<p>No action necessary</p>

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<p>**** Analysis- The customers obtained service fraudulently August 7 disconnect by violating WAC 480-100-123(4) admitting a fraudulent act per the terms of this rule. At that point WAC 480-100-128 (2)(a)(i) applies which allows the company to collect all service used as a result of the fraud. In this situation, the customer attempted to defraud the company of the entire balance due to reconnect and therefore that becomes the fraud amount.</p> <p>This interpretation of this room mate rule violation was discussed with Staff on February 10, 2009.</p> <p>**Credit disconnect 10/29/09- If current process had been in place at time of disconnect the move-on date would be 9/3/09. The pledge of \$1000.00 would apply to deposit+ reconnect fee and charges moving forward. Credit of \$405.00 on the new product assignment and prior obligation balance of \$67.40. 3 customer payments to apply towards prior obligation debt. Balance transfer of \$868.40 to be removed and placed back on original account- payment plan opportunity would be offered. Customer has ended</p>	<p>PSE Help Kitsap Community Resources</p>	<p>Corrections in process; Prior obligation inserted from disconnection on 10/29/09. Pledge moved to new product assignment. Customer payments moved to prior obligation debt. Off cycled a statement for review, will contact customer to review corrections and offer arrangements.</p>
<p>G Pledge Review</p>	<p>CAMP - PSE Help</p>	<p>Credit Adjustment in process; moved pledge to cover new product assignment. Pullback 200.83 from collections to apply credit from late fees. Contact customer to review statement and offer arrangements on prior obligation balance.</p>
<p>H Pledge Review</p>	<p>Customer Payment of 913.04 and (\$100 paid previously)</p>	<p>No correction necessary as customer is current on their bills and payments applied accurately.</p>
<p>I</p>		

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J	Disconnect	[REDACTED]	No payment	<p>Payment arrangements denied on 10/22/09 as customer had not made payment last 5 months and did not qualify for payment assistance. Service was disconnected 10/29/09. Customer did not call until 11/14/09. No demonstration that could not pay, however without review of phone call - unsure what conversation was. Service ended date of disconnect 10/29/09 as no reconnect requested.</p> <p>If our current process had been in place when the disconnect happened the move-in date would have been 9/28/09. The pledge of \$640.00 would apply towards deposit + reconnect fee and charges moving forward. At that time a credit of \$503.00 would be on the new product assignment and prior obligation balance of \$339.69. One customer payment of \$100.00 would have applied to prior obligation balance, as based on past usage credit from pledge would still be active. Customer has since moved, however balance transfer has occurred for unpaid charges at the service address in review. Balance transfer would need to be reversed and payment plan offered on those charges. The customer abruptly disconnected the call and the agent was unable to offer alternate actions for reconnection. The full disconnect amount was paid by the customer.</p>	<p>No correction necessary as customer has moved. No payments made for the duration time the account was open 5/9/09-10/29/09. Balance sent to bad debt and would have been sent regardless of process taken, as no effort to make payments or seek assistance.</p>
K	Pledge Review	[REDACTED]	PSE Help Opportunity Council	<p>Correction in process; insert prior obligation, correct pledge to new product assignment. Contact Customer to review correction and offer customer a payment plan to avoid collection action.</p>	<p>Correction in process; insert prior obligation, correct pledge to new product assignment. Contact Customer to review correction and offer customer a payment plan to avoid collection action.</p>
L	Disconnect	[REDACTED]	Customer payment	<p>No action required as customer has moved. Balance of 388.95 is in collections.</p>	<p>No action required as customer has moved. Balance of 388.95 is in collections.</p>
M	Disconnect	[REDACTED]	Customer payment	<p>If our current process had been in place at the time of disconnect happened the customer would have been provided all actions available for reconnection. Full disconnect amount of \$726.13 + reconnect fee. Deposit to \$431.00 + reconnect fee, 1/2 deposit + reconnect fee. Energy assistance information would have been provided. This is rental home, and service since ended 1/31/10.</p>	<p>No action required as customer no longer at address. Balance of \$223.15 is in collections.</p>

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N	Pledge Review	PSE Help Snohomish County	<p>at disconnected for 952.42 on 10/23/09. Pledge of customer paid 100.00 at the same time. If current process followed: Move in 9/30/09 usage until move out 7/15/10 is 1,223.58 - total pledges and payments on account since disconnect = 2,012. The prior obligation amount would be 1,044.51 we would reallocate the payments from customer during that time of \$660 to this amount making prior on closed product owing \$384.51, the deposit 269.00 would apply back on the new product assignment with pledge of 909 and 443.00 paying towards the 1223.58 leaving a credit on the new product 128.42 (we could not refund to customer as this was prior and Pledge paid deposit initially).</p> <p>If our current process had been in place when the disconnect happened the move-in date would have been 10/6/09. The pledge of \$609.00 would apply towards deposit + reconnect fee and charges moving forward. At that time a credit of \$318.00 would be on the new product assignment and prior obligation balance of \$437.72. 4 additional pledges since time of disconnect, totalling \$655.00 along with one customer payment of \$40.00 would leave current balance owed of \$300.47. Payment plan opportunity would be offered on prior obligation balance.</p>	<p>Correction in process; insert prior obligation, correct pledge to new product assignment. Move customer payments to cover prior obligation amounts. Contact Customer to review correction and offer customer a payment plan to avoid additional collection action.</p>
O	Pledge Review	PSE Help Metropolitan Development Council	<p>If our current process had been in place when the disconnect happened the move-in date would have been 10/1/09. The pledge of \$746.00 would apply towards deposit+ reconnect fee and charges moving forward. At that time a credit of \$635.00 would be on the new product assignment and prior obligation balance of \$678.47. No additional payments or pledges and service ended 12/31/09 as customer moved out. Outstanding credit from paid/secured deposit and pledge would then apply to unpaid prior obligation balance, adjusting to \$434.97. Unpaid balance of \$302.23 sent to collection agency. No attempt from customer to pay towards past due balance.</p>	<p>Corrections in process, prior obligation inserted for disconnection. Pledge moved to cover new product assignment. Customer payments moved to cover prior obligation balance and current charges. Statement review for accuracy and once complete customer contacted with detailed explanation.</p>
P	Pledge Review	PSE Help Kitsap Community Resources	<p>Corrections in process, prior obligation inserted for 10/20/09 disconnection. Pledge moved to cover new product assignment. Statement review for accuracy and once complete customer contacted with detailed explanation.</p>	<p>Corrections in process, prior obligation inserted for 10/20/09 disconnection. Pledge moved to cover new product assignment. Statement review for accuracy and once complete customer contacted with detailed explanation.</p>

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Q	Pledge Review	PSE Help Pierce County Community Service	<p>If our current process had been in place when the disconnect happened the move-in date would have been 10/21/09. The pledge of \$1000.00 would apply towards deposit + reconnect fee and charges moving forward. At that time a credit of \$688.00 would be on the new product assignment and prior obligation balance of \$877.22. 2nd pledge of \$1000.00 awarded in 12/09 \$1086.49 would have been credit, factoring bills. 7/10 disconnect would not have occurred. \$37 reconnect fee waived and late fees reversed. Customer payment adding to large credit. 11/10 disconnect would not have occurred. \$37 reconnect fee waived and late fees reversed. Customer payments to be redirected to prior obligation balance, bringing \$79.43 as possible payment plan amount. Customer ended service 2/11.</p>	<p>Corrections in process; Prior obligation inserted for 10/22/09 disconnect. Pledges and payments directed to prior obligation balance. Statement review for accuracy and once complete customer contacted with detailed explanation.</p>
R	Pledge Review	PSE Help Multi-Service Center	<p>If our current process had been in place when the disconnect happened the move-in date would have been 10/8/09. The pledge of \$543.00 would apply towards deposit + reconnect fee and charges moving forward. At that time a credit of \$300.00 would be on the new product assignment and prior obligation balance of \$484.98. Additional pledge of \$466.00 received 3/10 then credit of \$352.74. 3/25/10 disconnect would not have occurred. \$37 reconnect would be reversed as well as all late fees. New disconnect occurred 2011 however was valid due to lack of customer payments or additional pledge. Prior obligation processed on that product assignment accurately.</p>	<p>Corrections in process, prior obligation inserted from 10/21/09 disconnect. Pledges and customer payments moved to the new product assignment. Statement review for accuracy and once complete customer contacted with detailed explanation.</p>
S	Pledge Review	PSE Help CAMP	<p>If current process had been in place when the disconnect happened the move-in date would have been 9/28/09. The pledge of \$594.00 would apply towards deposit + reconnect fee and charges moving forward. At that time a credit of \$445.00 would be on the new product assignment and prior obligation balance of \$462.12. Additional pledges of \$315.00 and \$505.00 received and used for reconnection of service. Credits would have carried forward and avoided 3/20/10 disconnect. 10/2010 disconnect is valid due to lack of payment/pledge however pledge used for reconnect so prior obligation would be inserted.</p>	<p>Corrections in process, prior obligation inserted from 10/21/09 disconnect. Pledge moved to the new product assignment. Statement review for accuracy and once complete customer contacted with detailed explanation.</p>

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T	Pledge Review	[REDACTED]	PSE Help Kitsap Community Resources	<p>If current process had been in place when the disconnect happened the move-in date would have been 10/7/09. The balance of \$488.00 would apply towards deposit + reconnect fee and charges moving forward. At that time a credit of \$299.00 would be on the new product assignment and prior obligation balance of \$583.41. 6/2010 disconnect is valid and customer opted not to process as prior obligation, and simply pay the disconnect amount. Subsequent pledges received would be applied to the new product assignment moving forward and 5 subsequent payments directed to pay off prior obligation debt.</p>	<p>Corrections in process, prior obligation inserted due to 10/21/09 disconnect. Pledge redirected to cover charges on new product assignment, and customer payments moved to pay off prior obligation debt. No need to contact customer as these adjustments will not effect their zero balance owing.</p>
U	Pledge Review	[REDACTED]	DSHS Olympia	<p>Customer disconnected for the deposit 302.00. Disc 10/29/09 pledge of 407.72 received that day. Additional pledges made to the account in 2010 no disconnects.</p>	<p>No action is required as customer moved out April 5, 2010 and a refund check was issued in May Refunded \$371.09 to customer, we received this check back unable to contact customer.</p>
V	Pledge Review	[REDACTED]	PSE Help Metropolitan Development Council	<p>If current process had been in place when the disconnect happened the move-in date would have been 10/3/09. The pledge of \$1000.00 would apply towards deposit + reconnect fee and charges moving forward. At that time a credit of \$668.00 would be on the new product assignment and prior obligation balance of \$706.39. 4/16/10 field visit would have not occurred due to credit, \$13.00 fee should be reversed. 7/1/10 disconnect is valid due to non-payment. Subsequent pledges received would be applied to the new product assignment from initial prior obligation and subsequent payments directed to prior obligation debt.</p>	<p>Corrections in process; Prior obligation inserted due to disconnection on 10/22/09. Pledges moved to new product assignment. Customer payments moved to pay off prior obligation balance. Statement review and customer contacted to review corrections.</p>
W	Pledge Review	[REDACTED]	MSC Pledge PSE Help	<p>Disconnected on 10/22/09 for 918.30. Pledge of 845.00. Correction would be messy but with new prior process would have processed Move in for prior date 10/8/09. Deposit of 367.00 would apply to prior obligation balance 989.42 leaving a remaining balance of 622.42 for installment. Pledge of 845.00 minus new deposit of 214.00 and reconnect fee of 37 = 594 credit. Charges from 10/8/09 - 3/9/10 = 724.20 = 130.2 due. Disconnected 4/1/10 for 776.57 (should have been for 130.20 past due amount). Prior Obligation quoted and accepted by customer. No other disconnections on account</p>	<p>Corrections in process; Prior obligation inserted due to disconnection on 10/22/09. Pledges moved to new product assignment. Customer payments moved to cover prior obligation balance. Pull back from collections. Statement review and contact to customer to review corrections and offer arrangements.</p>
X	Pledge Review	[REDACTED]	Da Vita Dialysis	<p>Customer disconnected on 10/15/09 for 227.31 (due to an NSF payment). Disconnected again on 1/20/10 for 140.19, 2/18/10 for 163.37, 7/9/10 for 158.59, 9/1/10 for 139.47, 2/4/11 for 255.51. Currently up for disconnect for 261.51. All pledges that have applied since 2009 have paid prior to a disconnection of service.</p>	<p>Corrections in process; Prior obligation inserted from disconnection on 10/15/09 due to pledge. Customer contacted to discuss correction and review of statement.</p>

Y	No Pledge	DSHS	<p>Disco 10/21/09 for 224 (deposit), DSHS called to pledge on account 10/22/09, another pledge of 1,000 on 11/4/09 if access was followed: 305.89 would have been prior amount, current account balance would be 40.16, however, there was a disconnect done in 10/10, no pledge however prior was not offered and customer paid 300, Service currently disconnected as of March 24, 2011. No contact from customer.</p>	<p>Corrections in process; Prior obligation inserted from disconnection on 10/21/09. Pulled back from collections. Customer payments moved to cover prior obligation balance. Statement review for accuracy and contact to customer to review corrections and offer arrangements.</p>
Z	No Pledge	Customer payment	<p>Disconnected on 10/19/09 for 450.91. On 10/21/09 reconnect payment made of 350.00, arrangements made on balance of 718.88, went delinquent due to non pay on 11/6/09 for 368.88. Disconnected on 1/5/10 for 309.41 Prior obligation was offered 1/7/10 due to disconnect customer paid less than disconnect amount by 14 cents should have processed as prior. Balance of 526.11 minus deposit of 272.00 = 254.11 would be prior obligation balance owing. Payments of 789.00 prior to disconnect (4/29/10 for 270.32) usage charges of 687.98 and deposit of 272 = 959.98, total 170.98 disconnect would have happened. Customer paid full disconnect amount no prior obligation would have been necessary with new process. Payments of \$570 prior to disconnect (9/24/10 for 398.11) usage charges and late fees of 701.86, total 131.86 disconnect would have happened. Customer paid more than disconnect amount no prior obligation would have been necessary with new process. Payments of \$1,072 received prior to disconnect (May 12, 2011 for 414.67) usage charges and late fees of 1189.72 disconnect would have had</p>	<p>Corrections in process; Prior obligation inserted from disconnection on 10/19/09. Leaving \$286.95 into a prior obligation balance. Statement review and contact to customer to review corrections and offer arrangements.</p>

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