

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

**DOCKETS UE-090704 and
UG-090705 (*consolidated*)**

**NW ENERGY COALITION'S ANSWER
TO PUGET SOUND ENERGY, INC.'S
PETITION FOR RECONSIDERATION**

1. Puget Sound Energy, Inc. ("PSE") has filed a Petition for Reconsideration ("Petition") with respect to a single issue. PSE had sought to increase the annual level of low-income electric and gas bill assistance funding by the corresponding percentage increase to the residential class that the Commission approved.¹ In Order 11 in these proceedings, the Commission approved increases to PSE's residential rate schedules but did not address the bill assistance issue.

¹ PSE Initial Brief at ¶ 146.

2. The NW Energy Coalition (“Coalition”) supports the Petition. The Commission’s rules permit a party to seek reconsideration of an order that is erroneous or incomplete.² Reconsideration of Order 11 is appropriate because the Order is incomplete – it does not address the issue of low-income bill assistance that PSE had raised.

3. Further, the bill assistance issue is critically important. It is essential that PSE provide funding and other services in order to mitigate the impacts of electric and gas rates on low-income customers. For this assistance to be meaningful, though, the funding and services must at least keep pace with the company’s rates, including any changes that the Commission authorizes. That is the point of PSE’s original filing and the Petition – to increase bill assistance funding by the same percentage increase that the Commission approved for the residential class in Order 11.

4. State law permits the Commission to approve increases in bill assistance funding, and the increase that PSE requests is consistent with this direction.³ The Commission approved an increase to Avista’s low-income rate assistance program, stating:

“We agree with Public Counsel and The Energy Project that establishing an increase for LIRAP funding guaranteed to keep pace with or possibly exceed any approved rate increase is in the public interest. The current economic recession has placed increased pressure on low income households and resulted in the creation of more low income households. Though even this increased level of LIRAP funding may not be adequate to meet all the needs of low income households, the proposed approach to LIRAP funding is consistent with RCW 80.28.068 and will have minimal impact on the bulk of other ratepayers.”⁴

² WAC 480-07-850(1)-(2).

³ RCW 80.28.068.

⁴ *WUTC v. Avista Corporation, d/b/a Avista Utilities*, Docket Nos. UE-090134, UG-090135, and UG-060518, Order 10 at ¶ 37 (December 22, 2009).

5. With regard to the procedural issue that Staff may raise, *i.e.*, that low-income bill assistance funding should be considered in a later proceeding, the Coalition believes that the Commission should not wait to increase the funding level. Again, it is important that bill assistance for low-income customers keeps pace in a timely manner with the rate increases that the Commission has already approved for PSE's residential class. We urge the Commission to grant the Petition and approve the increase in bill assistance funding that PSE requests.

Dated this 16th day of April, 2010.

NW ENERGY COALITION

By: _____

David S. Johnson, Attorney
Danielle Dixon, Senior Policy Associate