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October 21, 2019

SENT VIA UTC WEB PORTAL

Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Sq. Loop SE
P.O. Box 47250
Lacey, Washington 98503

Re: Open Meeting Items, October 24, 2019: Natural Gas Rate Increases
Puget Sound Energy - UG 190789 (Item F.18)
Avista Utilities – UG 190703 (Item F.3)
Cascade Natural Gas – UG 190733 (Item F.14)
Northwest Natural Gas – UG 190765 (Item F. 7)

Dear Mr. Johnson:

The Energy Project is writing to express concern about the impact of the PGA-related increases in the above dockets on low-income ratepayers of Washington’s natural gas utilities. For the largest utilities, PSE, Avista, and Cascade, the increases are in double digits, in the 13-14 percent range, when combined with other simultaneously scheduled changes. We appreciate that some of the filings include amortizations to spread the impact. Even with this effort, however, these increases still exceed the traditional 10 percent trigger for “rate shock,” and they will take effect on November 1 at the beginning of the heating season, further exacerbating the negative impact on energy affordability for low-income households.

While The Energy Project does not have a recommendation regarding the mechanics of the PGA filings themselves, we are requesting that the utility companies take this opportunity to provide additional notice to their customers and communities of the availability of low-income energy assistance and weatherization programs. Utility company bill assistance programs provide a critical means for low-income households to cope with rate increases of this magnitude. The Energy Project’s review of the customer notices filed in the various dockets indicate that the availability of assistance was either not mentioned in the notice at all (PSE, NNG), or was “buried” in other text rather than being highlighted (Avista, Cascade).¹ While the companies do provide general information about assistance programs on an ongoing basis, in these circumstances, additional enhanced notice to the public in affected communities would be timely and beneficial.

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Date: October 21, 2019
To: Mark Johnson
Re: UG 190789, UG 190703, UG 190733 & UG 190765
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The Energy Project respectfully requests that PSE, Cascade, Avista, and NNG commit to providing additional enhanced notice of natural gas bill assistance in conjunction with approval of the PGA filings. In addition to sharing information about the increases with Community Action Agencies, The Energy Project is reaching out to the utilities to discuss potential outreach and marketing efforts to address this increase.

Thank you for considering this recommendation. Director Shawn Collins will be in attendance at the Open Meeting on October 24. The Energy Project respectfully requests that these dockets be moved from the No Action agenda so that discussion of this issue can occur.

Sincerely,

/s/ Simon J. ffitch, WSBA No. 25977
Simon J. ffitch
Attorney at Law
for The Energy Project

SJf:cjb

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¹ The company notice filings do not indicate whether customers were informed about the availability of bill assistance by separate methods at the time of the rate increase notice.