

**EXH. CLW-10T  
DOCKETS UE-240004/UG-240005 et al.  
2024 PSE GENERAL RATE CASE  
WITNESS: CAROL L. WALLACE**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**Docket UE-240004  
Docket UG-240005  
(consolidated)**

**In the Matter of the Petition of**

**PUGET SOUND ENERGY**

**For an Accounting Order Authorizing  
deferred accounting treatment of  
purchased power agreement expenses  
pursuant to RCW 80.28.410**

**Docket UE 230810  
(consolidated)**

**PREFILED REBUTTAL TESTIMONY (NONCONFIDENTIAL) OF**

**CAROL L. WALLACE**

**ON BEHALF OF PUGET SOUND ENERGY**

**SEPTEMBER 18, 2024**

**PUGET SOUND ENERGY**  
**PREFILED REBUTTAL (NONCONFIDENTIAL) OF**  
**CAROL L. WALLACE**

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**PUGET SOUND ENERGY**

**PREFILED REBUTTAL TESTIMONY (NONCONFIDENTIAL) OF  
CAROL L. WALLACE**

**LIST OF EXHIBITS**

- Exh. CLW-11     PSE Customer Language Translation Stats
- Exh. CLW-12     PSE Residential Customer Protections
- Exh. CLW-13     PSE Call Center Translation Services

1 **PUGET SOUND ENERGY**

2 **PREFILED REBUTTAL TESTIMONY (NONCONFIDENTIAL) OF**  
3 **CAROL L. WALLACE**

4 **I. INTRODUCTION**

5 **Q. Are you the same Carol L. Wallace who submitted Prefiled Direct Testimony**  
6 **on February 15, 2024 on behalf of Puget Sound Energy “PSE”) in this**  
7 **proceeding?**

8 A. Yes, on February 15, 2024, I filed the Prefiled Direct Testimony of Carol L.  
9 Wallace, Exhibit CLW-1T and eight supporting exhibits (CLW-1T through CLW-  
10 9).

11 **Q. What is the purpose of your rebuttal testimony?**

12 A. My rebuttal testimony responds to the Prefiled Direct Testimony of Shaylee N.  
13 Stokes, Exh. SNS-1T, Prefiled Direct Testimony of Roger D. Colton, Exh. RDC-  
14 1T and Prefiled Direct Testimony of The Joint Environmental Advocates, Exh.  
15 MT-CT-1T. Specifically, my testimony will respond to the following:

- 16 1. I respond to the testimony regarding lack of collaboration within PSE’s Low  
17 Income Advisory Committee (“LIAC”). I will also address the request to hire a  
18 neutral facilitator to run the LIAC meetings.
- 19 2. I demonstrate what customer demographic data PSE currently collects. I also  
20 discuss PSE’s concerns regarding demographic data and the proposed approach.

1 Lastly, I address the concerns regarding collection of specific customer language  
2 preferences.

- 3 3. I address the concern about PSE's existing disconnection policies and procedures  
4 being inequitable, including clarification of how PSE's dunning process  
5 determines which customers will enter the process. I also address concerns  
6 regarding the various types of outreach, and clarify the difference between  
7 dunning outreach and other, explaining the use of postal mail and/or e-mail.
- 8 4. Lastly, I explain the reasoning behind PSE's proposed change to the affordability  
9 metrics and why PSE feels that this data is sufficient.

10 **II. LOW INCOME ADVISORY COMMITTEE**

11 **Q. How often does PSE meet with the LIAC?**

12 A. PSE has regularly scheduled LIAC meetings every other month, with off-cycle  
13 meetings scheduled as needed for projects or other special circumstances.

14 **Q. Has PSE interacted with the LIAC outside of these regularly occurring**  
15 **meetings?**

16 A. Yes, PSE's involvement with the LIAC goes beyond the regularly scheduled  
17 meetings with the full Committee. With PSE's Bill Discount Rate project, PSE  
18 asked for volunteers from the full LIAC to participate in a small working group  
19 that would be more heavily involved in the project. PSE worked with this small

1 working group throughout the requirements and design process. As it seemed to  
2 work well and allowed for more in depth conversations with the representatives of  
3 the LIAC than sessions with the full group, PSE did this same approach with our  
4 Arrearage Management Plan project and used LIAC feedback to add requirements  
5 and make changes to the program structure.

6 **Q. Does PSE agree with Stokes' assertion that there is a lack of collaboration in**  
7 **the LIAC meetings and input is not heard?<sup>1</sup>**

8 A. No, and I can share two examples. The first example of a change that PSE made  
9 was for the Arrearage Management Plan project. PSE had proposed that  
10 customers would exit the program after two missed or late payments. After  
11 discussion with the team and input from committee members, PSE generally  
12 agreed, and changed the requirement to three missed or late payments. In  
13 addition to increasing to three missed payments, the group agreed to apply the  
14 arrearage forgiveness immediately after the customer becomes current, as  
15 opposed to the original plan to apply it at the end of the 12-month term. The  
16 second example was for the Bill Discount Rate, where PSE incorporated LIAC  
17 feedback and increased the maximum income allowed from 0-50% Area Median  
18 Income or 200% Federal Poverty Level to 80% Area Median Income or 200%  
19 Federal Poverty Level by adding a sixth tier, increased the percentage discount  
20 from 30% to 40% for Tier 2, and went beyond an ask to change T1 to include 10

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<sup>1</sup> Stokes, Exhibit SNS-1T at 8:9-16.

1 or 15% FPL to have it include 20% FPL. During this process, PSE also walked  
2 through each point of feedback received and provided additional data as requested  
3 by the LIAC.

4 **Q. Stokes' states that PSE did not consult with its LIAC<sup>2</sup> regarding the UTC**  
5 **order to have at least 70,000 gas customers receiving the Climate**  
6 **Commitment Act Prioritized Credits by the end of 2023.<sup>3</sup> Is this true?**

7 A. No. The LIAC was made aware multiple times (9/18/2023, 12/12/2023,  
8 5/14/2024, 7/9/2024) of how PSE intended to reach this goal and the timeframe  
9 was also stated in the compliance filing that was approved. Staff filed a letter in  
10 response to PSE's compliance filing stating it believed PSE satisfied the Order.  
11 The Energy Project also filed a letter in response to the compliance filing that it  
12 recommended an extension and additional outreach but did not request that  
13 approval of the compliance filing be contingent on PSE agreeing to that extension  
14 and completing additional outreach. Both the filing from Staff and from TEP  
15 indicate that they had read and were aware of how PSE met the target, including  
16 the two communication points and the August 31, 2024, end date, and the filing  
17 was still approved. The Commission's acknowledgement letter confirmed the  
18 compliance report filed by PSE is in compliance with the Order, but made no  
19 mention of TEP's request. PSE met with The Energy Project, NW Energy

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<sup>2</sup> *Snokes*, Exhibit SNS-1T at 10:1–12:5.

<sup>3</sup> *Wash. Utilities and Transp. Com. v. Puget Sound Energy*, Dkt. UG-230470, Order 01 Allowing Climate Commitment Act Tariff Revisions to Become Effective Subject to Conditions, at ¶ 20 (Aug. 3, 2023).

1 Coalition, and Staff in May. During that meeting, PSE was agreeable to exploring  
2 whether to extend the enrollment period beyond August 31, 2024, but made it  
3 clear that the decision would need to be escalated beyond the PSE representatives  
4 at the meeting. PSE thoroughly discussed and explored the options internally  
5 before deciding not to extend. The internal decision was made in time for the July  
6 LIAC meeting, and as PSE believed all members of the LIAC would be interested  
7 in the outcome, PSE shared the decision at that meeting and provided opportunity  
8 for LIAC members to provide any feedback or follow up requests in that meeting.  
9 No additional requests, such as to do a third round of follow up, were made at that  
10 time.

11 **Q. Is PSE open to bringing in a neutral facilitator to run its LIAC meetings as**  
12 **requested by Stokes?<sup>4</sup>**

13 A. Yes, PSE would welcome a neutral facilitator for its LIAC meetings if the  
14 company can add this cost to its Schedule 129 tariff. Per the 2023 GRC settlement  
15 agreement, “PSE will not recover new types of costs in its Schedule 129 tariff  
16 riders without first consulting the LIAC and making a subsequent filing for  
17 Commission approval.”<sup>5</sup> PSE needs cost reimbursement as meetings with the  
18 LIAC can be much more frequent than those with the EAG – for instance, the  
19 small working groups’ sessions were extensive for projects discussed above.

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<sup>4</sup> Stokes, Exhibit SNS-1T at 16:6-8.

<sup>5</sup> *WUTC v. PSE*, Dockets UE-220066/UG-220067 and UG-210918 (consolidated), Final Order 24/10, Appendix A at 22, item f (Aug. 26, 2022).



1 **Q. Does PSE have an estimated cost to obtain a neutral facilitator?**

2 A. PSE has not done additional research on costs other than to look at what is done  
3 currently with the EAG. That cost is \$170,000 – \$240,000 per year, which  
4 includes facilitation, meeting support and equity forum listening event  
5 coordination, and planning. LIAC costs would potentially be slightly less for just  
6 the facilitation and meeting support; however, as stated above, it would be more  
7 meetings per year than the EAG currently holds.

8 **III. COLLECTION OF CUSTOMER DEMOGRAPHIC DATA**

9 **Q. Do you agree with JEA’s assertion that PSE does not collect any customer**  
10 **demographic data?<sup>6</sup>**

11 A. No. PSE collects four of the nine pieces of demographic data listed by JEA,<sup>7</sup> as  
12 well as some others, and has since 10/1/2023. On the PSE HELP/BDR  
13 application, PSE asks for the following:

- 14 • Housing status (own/buy, subsidized, rental);
- 15 • Housing type (1 to 3 family; 4+ family, hi-rise, mobile, RV);
- 16 • Household income including income sources;

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<sup>6</sup> Thuraisingham and Thompson, Exh. MT-CT-1T at 32:4-6.

<sup>7</sup> Thuraisingham and Thompson, Exh. MT-CT-1T at 32:6-22.

- Household members including the age of each member (collected by asking for DOB);
- Disabled (yes/no)

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4 **Q. Do you agree with Stokes' assertion that PSE claimed to not have support to**

5 **collect demographic data in April, 2023?**<sup>8</sup>

6 A. Yes. PSE had been working with the LIAC to develop the list of demographic

7 questions that would be asked, but did not have the technology to support keeping

8 the data secure and anonymized. PSE does not want demographic data tied to a

9 specific customer account or application, as it is not needed in order for customers

10 to receive our services. The e-mail referenced in Exh. SNS-3 was in the context

11 of having a project requirement to collect demographic data removed for this

12 reason.

13 **Q. Is PSE opposed to collecting additional demographic data for its customers?**

14 A. No. PSE understands the value of collecting demographic data to show program

15 effectiveness and agrees that collecting the demographic data points listed by JEA

16 makes sense, with limitations for information security and customer privacy. In

17 order to properly collect the data and protect customers, PSE would want to

18 launch a small project to develop the tools to collect data securely. Bandwidth to

19 do this work in recent years has been limited due to the demands of COVID, Bill

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<sup>8</sup> Stokes, Exhibit SNS-1T at 9:8-15.

1 Discount Rate, and Arrearage Management work. PSE would like to take the  
2 time needed to properly scope and define this work so it does not add additional  
3 undue burden to customers in the application process. PSE would propose to  
4 accomplish collection of demographic data by adding a link to the end of the  
5 application process asking customers if they would be willing to share some  
6 information in order to ensure that we are serving our customers in need. The link  
7 would separate the customer's responses from their application, maintaining  
8 security and ensuring that we are not exposing our customers to unnecessary risk  
9 with their personal data.

10 **Q. Stokes indicated that CAAs need demographic data in order to secure**  
11 **funding and identify customers.<sup>9</sup> Can PSE share voluntary demographic**  
12 **data with the CAAs?**

13 A. Yes, PSE would be able to share with the agencies demographic data at a zip code  
14 level for those customers that have been served and have responded. Should PSE  
15 be required to provide information on customers in a more granular manner, PSE  
16 could run into additional costs, requirements, and risks related to its obligation to  
17 safeguard customer information under WAC 480-100-153. Aggregated data on  
18 the zip code level should sufficiently balance the concerns of all parties involved.

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<sup>9</sup> Stokes, Exhibit SNS-1T at 18:16-20.

1           **IV.     COLLECTION OF CUSTOMER LANGUAGE PREFERENCE**

2       **Q.     Do you agree with Stokes’ concerns regarding PSE collection of language**  
3       **preferences?<sup>10</sup>**

4       A.     PSE agrees with Stokes’ concerns in part. PSE does not have an official company  
5       policy regarding when to provide services in other languages. However, PSE  
6       does not agree with Stokes’ statement that PSE’s language data shows that the  
7       company is not doing enough to support non-English speaking customers. 8.5%  
8       of PSE’s residential customer base speak one of the 6 languages that are available  
9       as translation on pse.com as a primary language. However, PSE data continues to  
10      show that web translation via PSE.com or Google is rarely used. In fact, from  
11      April 1, 2023, to April 30, 2024, PSE translation data showed that 97.8% of  
12      58MM (total of 57.8MM) page views used no translation (English) on pse.com.  
13      See Exhibit CLW-11 for a summary of this information.

14      **Q.     Does PSE have any language translation data that could demonstrate its**  
15      **customers’ need?**

16      A.     Yes. Exhibit CLW-13 has 2022, 2023 and 2024 YTD call center data where  
17      translation services were requested, demonstrating that Spanish is the highest  
18      language need second to English.

19      **Q.     Does PSE have plans to collect language preferences from customers?**

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<sup>10</sup> Stokes, Exhibit SNS-1T at 35:6–36:12.

1 A. Yes, and this functionality is scheduled to release in September 2024. Language  
2 preferences will be stored in PSE's customer information systems.

3 **Q. How does PSE plan to use this language preference data?**

4 A. PSE will use this data for targeted in-language marketing communications and  
5 engagement in customers' stated preferred language through PSE's owned  
6 channels, including email and direct mail. It will also provide PSE with additional  
7 data about customer language needs that can be aggregated for use in other  
8 communication channels, such as social media and advertising, and it will help  
9 inform which languages PSE should develop its communications in to reach the  
10 largest number of customers in their preferred language. By early 2025, if the  
11 customer's preferred language is Spanish and the customer enters the dunning  
12 process, then the customer's urgent and final notices will both be in Spanish. For  
13 other preferred languages, or when there is no preferred language selected, these  
14 notices will continue to be in English.

15 **Q. Stokes asserts that the Commission should order PSE to not only track**  
16 **language preferences but also provide communications and information in**  
17 **those languages when available.<sup>11</sup> Can PSE accomplish this?**

18 A. PSE will be able to send certain communications in a customers preferred  
19 language. PSE data shows that translation services are not broadly used, other

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<sup>11</sup> Stokes, Exhibit SNS-1T at 36:18-20.

1 than Spanish. Therefore, initial efforts to customize communications will focus  
2 on Spanish. PSE is currently limited in which communications can be translated  
3 and sent in languages other than English. Transactional communications that  
4 come directly from the Customer Information System (move-in, move-out,  
5 program enrollments like Renewable Natural Gas), will continue to be sent in  
6 English. The system does not have the capability to host multiple copies of each  
7 notification and subsequently choose the correct one when it is sent. This would  
8 require a large investment and customization to change.

9 **Q. Outside of existing language translation services and plans to capture**  
10 **language preferences, what else is PSE doing to support customers who do**  
11 **not speak English as a primary language?**

12 A. Starting October 1, 2024, the PSE HELP, Bill Discount Rate, and Past Due Bill  
13 Forgiveness applications accessed from pse.com and through paper will be  
14 available in English or Spanish. The application has a new field to ask for the  
15 customer to select English or Spanish for their preferred language for their  
16 application. Customers who select email as their preferred communication method  
17 for their application will then receive those emails in their preferred language of  
18 English or Spanish.

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**Q. Is PSE willing to develop a language access plan as recommended by Stokes?<sup>12</sup>**

A. Yes, PSE is willing to develop a language access plan. PSE is working to determine what a realistic timeframe for developing the plan would be and what could be accomplished. PSE does not believe it can meet the aggressive timeline of June 1, 2025 for developing a language access plan.<sup>13</sup> Additionally, PSE disagrees that LIAC and EAG should be the only collaborators for building the language access plan. PSE wants to be sure that it develops a plan that incorporates feedback from multiple avenues, including feedback it receives directly from customers at in-language community events, and that the plan is carefully developed to consider the best interests of all of our customers and any additional considerations, like technical feasibility. For additional information on language access plans please see the Prefiled Rebuttal Testimony of Troy A. Hutson, Exh. TAH-10T.

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<sup>12</sup> Stokes, Exhibit SNS-T1 at 36:14-16.

<sup>13</sup> Stokes, Exhibit SNS-T1 at 38:17-39:10.

1                   **V.     PSE DISCONNECTION POLICIES AND PROCEDURES**

2   **Q.     Does PSE agree with Stokes' assertion that PSE's disconnection policies are**  
3   **inequitable?<sup>14</sup>**

4   A.     PSE does not agree with Stokes' assertion that PSE's disconnection policies are  
5   inequitable.

6           Puget Sound Energy believes its existing disconnection policies and procedures  
7           include an equity lens across the treatment of customers. If a customer does enter  
8           the dunning process, they have protections<sup>15</sup> and programs available to help get  
9           customers back on track. This is true of each customer who enters the dunning  
10          process, whether they have suddenly fallen on hard times and need quick help to  
11          get back on track, they are experiencing longer term financial hardship, or they  
12          are income eligible and needing assistance. Further, PSE has been growing these  
13          programs with the introduction of the Bill Discount Rate in 2023 and the new  
14          arrearage management program, Past Due Bill Forgiveness, which will be  
15          available starting on October first, 2024.

16   **Q.     Does PSE use criteria unrelated to a customer's current arrearages in order**  
17   **to determine their propensity to pay, as Stokes indicates?<sup>16</sup>**

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<sup>14</sup> Stokes, Exhibit SNS-1T at 26:1-2.

<sup>15</sup> See Wallace, Exh. CLW-12.

<sup>16</sup> Stokes, Exhibit SNS-1T at 27:5-15.



1 A. PSE's dunning policies and procedures consider customers who are taking  
2 ownership of their account management and those who are not. As we use our  
3 propensity to pay model, its sole intention is to help segment customers into two  
4 aspects, customers who are displaying good payment behaviors and those who are  
5 not displaying good payment behaviors. PSE uses a third party technology, Total  
6 Solutions Inc. ("TSI") for propensity to pay modeling. A residential or  
7 commercial customer with a TSI segment of "Good" or "Satisfactory" does not  
8 enter the dunning process when they have missed a payment and reached the  
9 dunning dollar limit threshold. TSI segmenting of "Good" or "Satisfactory" does  
10 not mean that the customer's behaviors are flawless, but rather that the customer's  
11 payment behaviors are generally positive despite the occasional late payment.  
12 This segmentation accounts for the occasional set back to reduce the number of  
13 customers that may otherwise move into the dunning process.

14 TSI segmenting has been designed to be another safety net or protection for  
15 customers. Should a customer make a payment late or miss payments for a couple  
16 of months but then get caught up, their rolling history shows that their payment  
17 behaviors are consistent or improving over time and they are getting back on  
18 track. TSI segmenting is a method of generalizing these behaviors and thus  
19 prevents customers who are typically actively managing their account from  
20 entering the dunning process altogether, which is exactly what PSE wants.

1 A customer with a segment of “Poor” or “High Risk” will enter the process if they  
2 also meet the dunning dollar limit threshold. The customers in these segments are  
3 either not paying, or maintain consistent partial payments leaving an arrearage to  
4 accumulate month over month. PSE strongly believes these customers need to  
5 enter the dunning process, so they receive targeted past-due outreach that is  
6 tailored to each customer’s situation. PSE is then able to educate these specific  
7 customers on what options are available to them. PSE wants customers to know  
8 what is readily available to them and that it’s not too late to get back on track and  
9 avoid the service disconnection.

10 **Q. Stokes recommends prioritizing customers for disconnections using only two**  
11 **factors, current arrearage amount and length of time in arrearage.<sup>17</sup> Will**  
12 **this have a positive impact on the number of customers up for disconnection?**

13 A. No. The method of segmenting customers acts as another safeguard for  
14 customers. The proposed change would have a negative impact on thousands of  
15 customers, who would then enter dunning whereas with PSE’s existing  
16 methodology they would not. Making the change as requested by Stokes would  
17 be one that is not only harmful to thousands of additional customers entering the  
18 dunning process and potentially being subject for disconnection, it would also  
19 remove that additional safeguard for customers who are currently segmented as  
20 “Good” and/or “Satisfactory” including: 63 percent known low income

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<sup>17</sup> Stokes, Exhibit SNS-1T at 32:14-15.

1 customers, 70 percent estimated low income, 67 percent deepest need, 67 percent  
2 highly impacted communities, and 69 percent who fall in all of the above  
3 characteristics. See Table 1 below.

4 **Table 1**

TSI Score Segment	% Known Low Income	% Estimated Low Income	% Deepest Need	% Highly Impacted Communities	% Known Low Income, Estimated Low Income, Deepest Need, or Highly Impacted Community
1 (Good)	50%	51%	53%	45%	49%
2 (Sat)	13%	19%	14%	22%	20%
3 (Poor)	8%	12%	6%	15%	14%
4 (High Risk)	28%	13%	22%	14%	13%
None	2%	5%	4%	4%	5%
Total	100%	100%	100%	100%	100%

5  
6 **Q. Is PSE willing to conduct an equity review of disconnection practices as**  
7 **Stokes requests?<sup>18</sup>**

8 A. Yes, PSE would welcome the opportunity to conduct a thorough equity review of  
9 disconnection practices. PSE would want to engage with a neutral third party that  
10 are disconnection practice experts to conduct this review. Disconnection spans  
11 across all customer classes, so a broad review is needed. PSE would need cost

<sup>18</sup> Stokes, Exhibit SNS-1T at 32:16-17.

1 reimbursement, as disconnection is a complex process and this type of review  
2 would be a large effort.

3 **Q. Stokes asks the Commission to order PSE to provide hard copy notices to**  
4 **customers at risk of disconnection.<sup>19</sup> Does PSE already provide these notices?**

5 A. Yes. For disconnection notices, PSE follows WAC 480-100-128 and 480-90-128  
6 requirements. The dunning process is a separate process from other targeted  
7 outreach. Similar to what is referenced by Stokes, PSE already sends hard copy  
8 notices to customers in the dunning process. PSE has chosen to continue to use  
9 postal mail outreach for all customers in dunning, and it may also include email as  
10 an additional form of communication if the customer has selected that as their  
11 preference. PSE would like to continue to have the flexibility to communicate  
12 with our customers in both methods of outreach where it's applicable.

13 Stokes is referring to Puget Sound Energy's process for outreach pursuant to  
14 Order 32/18.<sup>20</sup> When PSE is conducting targeted outreach, we may determine  
15 what form of outreach to use based on what the customer has selected as their  
16 preferred form of communication, either email or postal mail. In the referenced  
17 outreach, PSE used both email and mailed postcards.

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<sup>19</sup> Stokes, Exhibit SNS-1T at 32:18-19.

<sup>20</sup> Stokes, Exhibit SNS-1T at 31:11-13.

1 **Q. Does PSE agree with Colton’s assertion that the company’s lack of authority**  
2 **to disconnect service for non-payment does not lead to non-payment?**<sup>21</sup>

3 A. No. PSE resumed dunning on a subset of customers in arrears beginning in May  
4 2022. Customers were beginning to receive targeted outreach by phone, mailed or  
5 emailed notices, and field collection visits. Colton states that federal COVID  
6 relief assistance was no longer available, but there was. There were many  
7 additional assistance funding sources on-going from May 2022 to today that  
8 continued to help substantially reduce or eliminate past-due balances for income  
9 qualified customers.<sup>22</sup> While PSE has seen and continues to see good progress  
10 since resuming dunning efforts, the efforts are on all customers in the dunning  
11 process who are faced with a past-due balance, it’s simply not just low-income  
12 customers. PSE continues to view its dunning process as a way to conduct  
13 targeted outreach to customers who have a past-due balance and may need some  
14 additional help to get back on track, learn more about the array of programs we  
15 offer, and to help them find a solution that works.

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<sup>21</sup> Colton, Exh. RDC-1T at 21:1–23:5.

<sup>22</sup> Wallace, Exh. CLW-1T at 3:9-17; 16:14-21; 17:1-5.

1 **VI. PSE AFFORDABILITY METRICS**

2 **Q. What was the purpose of your proposed change to PSE’s Affordability**  
3 **Metrics?**<sup>23</sup>

4 A. The purpose of this metric is to measure changes in the average customer bill, *not*  
5 to understand what energy burdens are being faced. PSE’s Energy Burden  
6 Analysis (EBA) clearly demonstrates that we have a customer-level accounting of  
7 energy burden levels, which affords more granularity than the Census Tract-level  
8 measure proposed by Colton<sup>24</sup> and supported by Stokes.<sup>25</sup>

9 **Q. What other changes is PSE making to its affordability metrics?**

10 A. PSE is withdrawing the proposed metrics in this GRC, and PSE will be adopting  
11 and reporting on all metrics included in the UTC Metric Policy Statement.<sup>26</sup>

12 Therefore, PSE will replace its current reporting with the reporting outlined in the  
13 policy statement.

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<sup>23</sup> Wallace, Exh. CLW-1T at 23:5–25:13.

<sup>24</sup> Colton, Exhibit RDC-1T at 28:6 (Table 9).

<sup>25</sup> Snokes, Exhibit SNS-1T at 40:16.

<sup>26</sup> Docket U-210590, *Policy Statement Addressing Initial Reported Performance Metrics*, Appendix A (Aug. 2, 2024).

1 **Q. Are there metrics being requested that are not part of the Metric Policy**  
2 **Statement?**

3 A. Yes, there are three metrics being requested that are not part of the Metric Policy  
4 Statement by The Energy Project and WUTC Staff:

5 1. Share of Bill Assistance Customers who are in Highly Impacted Communities  
6 and Vulnerable Populations.<sup>27</sup>

7 2. Number and percentage of residential disconnect notices, electric  
8 disconnections for nonpayment, and reconnection by month and zip code for  
9 known low-income households, highly impacted communities, and vulnerable  
10 populations.<sup>28</sup>

11 3. Residential arrearages by month, measured by location (zip code) and  
12 demographic information (known low-income customers, vulnerable  
13 populations, highly impacted communities, and all customers in total).<sup>29</sup>

14 **Q. Does PSE agree with reporting on the requested metrics that are not**  
15 **included in the Metric Policy Statement?**

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<sup>27</sup> McGuire, Exh. CRM-1Tr at 20:5-6; Stokes, Exh. SNS-1T at 45:13-14.

<sup>28</sup> McGuire, Exh. CRM-1TR at 20:2-4; Stokes, Exh. SNS-1T at 44:7-18.

<sup>29</sup> McGuire, Exh. CRM-1Tr at 19:20-22; Stokes, Exh. SNS-1T at 44:7-18.

1 A. No. Regarding the Bill Assistance metrics, the Metric Policy Statement includes  
2 several metrics that comment on the effectiveness and participation of utility  
3 assistance programs. These metrics are sufficient for energy assistance.  
4 Regarding the disconnection and arrearages metrics, PSE already reports a set of  
5 disconnection metrics annually in its Disconnection Reduction Plan filing and will  
6 continue to do so.<sup>30</sup> Arrearages are sufficiently addressed in the Metric Policy  
7 Statement by several metrics, and any additional metrics would be duplicative.

## 8 VII. CONCLUSION

9 **Q. Does this conclude your Prefiled Direct Testimony?**

10 A. Yes, it does.  
11  
12

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<sup>30</sup> See generally Dockets UE-190529 and UG-190530 (consolidated).