

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

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DOCKET NOS. UE-190529 and UG-190530 (*Consolidated*)

**SUSAN M. BALDWIN ON BEHALF OF PUBLIC COUNSEL UNIT**

**EXHIBIT SMB-16**

Puget Sound Energy Response to Public Counsel Data Request Nos. 227, Revised Supplement

November 22, 2019

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-190529 & UG-190530  
Puget Sound Energy  
2019 General Rate Case**

**PUBLIC COUNSEL DATA REQUEST NO. 227:**

**Re: Disconnections.**

Please refer to PSE's response to Public Counsel Data Request No. 113, subpart (b), which states in part: "PSE disconnects a residential customer when a customer's past due balance reaches a threshold."

- a) Please explain in detail the reference to "threshold," e.g., does it correspond with a specific dollar amount? Please define threshold.
- b) Separately for each of the *years* 2014 through 2019, for the disconnections shown in PSE's response to Public Counsel Data Request No. 113, subpart (e), provide the average threshold reached related to the disconnections shown.
- c) Separately for each of the *months* shown for the 12 month period spanning September 2018 through August 2019, provide the average threshold reached relating to the disconnections shown in PSE's response to Public Counsel Data Request No. 113, subpart (e).
- d) Separately for each of the *years* 2014 through 2019, provide the (i) lowest threshold reached relating to a disconnection and the (ii) highest threshold reached relating to a disconnection for the disconnections shown in PSE's response to Public Counsel Data Request No. 113, subpart (e).
- e) Does PSE have any internal documents, training materials, customers service scripts, memoranda or other materials prepared by or on behalf of PSE that provide guidance, policies, or procedures relating to residential disconnections for non-payment? If so, please provide, and if PSE has modified its policies and procedures regarding disconnection for non-payment at any point since January 1, 2014, please describe the modification and the reason for the modification.
- f) Please refer to PSE's response to Public Counsel Data Request No. 113, subpart (e). Is PSE aware of any reason for the spike in disconnection in 2016? If so, please explain.

**First Revised and Supplemental Response:**

- a) Yes, the threshold is based on a dollar amount. A residential customer becomes eligible for disconnection when their past due balance is greater than \$70.
- b) There is not an average threshold, as the threshold is the static amount mentioned in response to part a (\$70 for residential customers).

The average amount owed by customers at disconnection is shown at the table below (note: 2019 data is through September 2019):

<b>Year</b>	<b>Average Owed at Disconnection</b>
2014	\$414.70
2015	\$276.18
2016	\$331.79
2017	\$353.29
2018	\$351.41
2019	\$294.95

- c) There is not an average threshold, as the threshold is the static amount mentioned in response to part a (\$70 for residential customers). The average amount owed from customers at disconnection is shown below:

<b>Year</b>	<b>Month</b>	<b>Average Owed at Disconnection</b>
2018	9	\$412.51
2018	10	\$308.48
2018	11	\$280.52
2018	12	\$249.14
2019	1	\$241.55
2019	2	\$234.74
2019	3	\$387.85
2019	4	\$320.77
2019	5	\$289.74
2019	6	\$274.40
2019	7	\$283.92
2019	8	\$296.77

- d) The minimum threshold for disconnection is \$70. The minimum amount customers have owed us upon disconnection, as well as the maximum amount customers have owed us upon disconnection, is shown in the table below (note: 2019 data is through September):

<b>Year</b>	<b>Min</b>	<b>Max</b>
2014	\$125.00	\$14,708.55
2015	\$70.00	\$18,326.00
2016	\$70.00	\$18,890.06
2017	\$70.00	\$44,463.25
2018	\$70.00	\$57,877.31

2019	\$70.00	\$10,178.76
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Note that the maximum cases are at the extreme end of disconnections. Some reasons are results of meter tampering, energy diversion, customer ability to seek a hold or extension on their account (such as medical emergency, life support, energy assistance).

- e) In this First Revised and Supplemented Response to Public Counsel Data Request No. 227, PSE would like to revise and supplement its response to subpart (e) to PSE's Response to Public Counsel Data Request No. 227 that was initially served on October 31, 2019.

In its original response, PSE erroneously directed Public Counsel to Public Counsel Data Request No. 197 for examples of training material associated with disconnection for non-payment. Training materials provided in response to Public Counsel Data Request No. 197 are the initial training materials provided to Customer Care Center ("CCC") agents.

Please see Attachments A through E to PSE's First Revised and Supplemental Response to Public Counsel Data Request No. 227 for secondary agent training materials associated with disconnections for non-payment. Any content updates, besides formatting, relate to PSE mandated Dunning/Prior Obligation policy and procedure updates. None of the training changes were due to policy changes associated with Prior Obligation, as PSE continues to follow the Prior Obligation policy established in 2014. The following is a summary of the changes to the training in the requested time period:

#### **2014**

- Original Secondary Agent training (Attachment A) content created, per CCC Supervisor / CCC Advanced Agent

#### **2016**

- New methodology used for Service Notification training
- All remaining content unchanged (no changes to Dunning Disconnect/Prior Obligation training material)

#### **2017**

- New content added for the **Web Interaction Record Tool** (WebIRT) used by agents to add documentation for Prior Obligation Disconnections/Reconnections (internal efficiency)
- An MS Excel spreadsheet had been used prior to the WebIRT creation

**2018**

- Original one master Secondary Agent training module broken out into four separate lessons, the two associated with disconnections for non-payment are included as Attachments B through E.

**2019**

- There have been no training updates to CCC Agent training in 2019 as it relates to disconnections for non-payment.

f) No, PSE is not aware of any reason for the spike in disconnection in 2016.

**ATTACHMENTS A through E to PSE's  
First Revised and Supplemental  
Response to  
PUBLIC COUNSEL Data Request No. 227**