



Puget Sound Energy  
 P.O. Box 97034  
 Bellevue, WA 98009-9734  
 PSE.com

Received  
 Records Management  
 04/29/22 16:40:19  
 State Of WASH.  
 UTIL. AND TRANSP.  
 COMMISSION

April 29, 2022

***Filed via Web Portal***

Amanda Maxwell  
 Executive Director and Secretary  
 Washington Utilities and Transportation Commission  
 621 Woodland Square Loop SE  
 Lacey, WA 98503

**Re: Docket UE-210800: Comments of Puget Sound Energy**

Dear Ms. Maxwell:

Puget Sound Energy (“PSE”) respectfully submits these comments in response to the Washington Utilities and Transportation Commission’s (“Commission”) March 18, 2022 Notice of Opportunity to File Written Comments (“Notice”) in the above-captioned docket. The Notice solicits comments on potential long-term changes and improvements to customer notice, credit, and collection rules, including the permanent elimination of late fees, disconnection and reconnection fees, and deposits.

PSE provides the data as requested below and asks the Commission to consider that there may be additional policy considerations associated with the use of these financial accountability tools that are not captured in these responses. For example, the use of fees and deposits, when not overly punitive, are tools utilities employ to engage with their customers and ensure customers have a stake in the energy and services they receive. If the Commission is going to permanently remove these as options to motivate customers to take action on their utility bills, it will be important to come up with alternative approaches to address the need for timely customer response to address their unpaid balances.

Additionally, as can be seen from the data below regarding late fees and disconnection and reconnection fees, only a small percentage of these occur in known low-income households. This means that the majority of fees are assessed to either households that are not eligible for energy assistance because they are not low-income, or they are not seeking the energy assistance available to them. If the primary intent of eliminating these fees is to assist low-income households, it may merit strategic conversations about how best to assist low-income households more specifically, rather than eliminating these tools all together.

PSE appreciates this opportunity to comment on this matter and the Commission’s efforts to collect and analyze this data to inform this rulemaking.

**Response to U-210800 CR101 Notice Questions:**

In the context of these responses, “low-income customers” refers to customers who received any form of energy assistance in the 2018 and 2019 calendar years.

**1. Does your company currently have a residential disconnection and/or reconnection fee in its filed tariff?**

**a. If so, please provide citations to all appropriate tariff references.**

**Electric Tariff G (WN U-60):**

Schedule 80 General Rules and Regulations, Section 30 Disconnection Visit Charge (Sheet No. 80-Z.1),

Schedule 80 Section 18 Connection and Reconnection Charges (Sheet No. 80-R.1)

**Natural Gas Tariff (WN U-2):**

Rule No. 9: Bills and Payment for Service, Section 7 Connection and Reconnection Charges (Beginning on Sheet No. 21-B),

Rule NO. 9 Bills and Payment for Service, Section 10 Disconnection Visit Charge (Sheet No. 21-C)

**2. Please provide the following information regarding the fees your company collected in 2018 and 2019, respectively:**

**a. Please provide the total dollar amount collected from residential customers for disconnection fees and reconnection fees each year, identifying each fee category separately.**

		YEAR	
CUSTOMER TYPE	FEE TYPE*	2018	2019
Residential	Disconnection Visit Fees	\$ 380,547	\$ 311,775
	Reconnection Fees	\$ 1,565,128	\$ 1,308,717
TOTAL:		\$ 1,945,675	\$ 1,620,492

**b. Please provide the total number of residential customer accounts and the number of customer accounts assessed disconnection fees or reconnection fees each year. Please identify each fee category separately, include only reconnection fees for previously disconnected customers, and exclude new customers reconnecting at an existing service address.**

PSE provided the total residential customer accounts as of December 31. Please note, a single customer account may have been assessed multiple fees. For example, the same customer may have been charged a disconnection visit fee and a reconnection fee in the same year or in both 2018 and 2019.

TOTAL RESIDENTIAL CUSTOMER ACCOUNTS		
CUSTOMER TYPE	2018	2019
Residential	1,417,061	1,437,391

# CUSTOMERS ASSESSED FEES			
CUSTOMER TYPE	FEE TYPE	2018	2019
Residential	Disconnection Visit Fees	22,934	19,694
	Reconnection Fees	40,699	34,043

c. Please provide the percentage of retail revenue your company derived from residential customer disconnection fees and reconnection fees each year, identifying each fee category separately.

		% OF RETAIL REVENUE	
CUSTOMER TYPE	FEE TYPE	2018	2019
Residential	Disconnection Visit Fees	0.011%	0.009%
	Reconnection Fees	0.047%	0.039%

d. If these disconnection fees and reconnection fees were removed from the company's tariff and recovered in base rates instead, how much would residential bills increase based on your company's currently approved rate spread? Please provide both a percentage increase and an average residential customer bill increase amount.

Residential bill impacts were calculated using 900kWh for electric residential customers and 64 therms for residential gas customers. Residential bill impacts were calculated using 2018 data.

		Average Bill	
CUSTOMER TYPE	Bill Increase Percentage	Bill Increase Amount	
Electric Residential	0.15%	\$	0.14
Gas Residential	0.06%	\$	0.04

3. Please provide the following information regarding the cost of disconnection and reconnection in 2018 and 2019, respectively, identifying each fee category separately.

a. What is the total cost the company incurred disconnecting residential customers each year?

PSE's response below includes all customers, not just residential.

Fee Category	Disconnection Cost	
	2018	2019
Call Center	\$ 1,480,603.38	\$ 1,233,151.02
Phone Outreach	\$ 1,859,900.80	\$ 2,101,625.60
Customer Notices	\$ 767,948.87	\$ 980,848.08
Field Operations	\$ 1,711,503.16	\$ 1,456,240.74
Total	\$ 5,819,956.21	\$ 5,771,865.44

**b. What is the total cost the company incurred reconnecting residential customers each year?**

PSE’s response below includes all customers, not just residential.

Fee Category	Reconnection Cost	
	2018	2019
Call Center	\$ 1,251,039.34	\$ 1,051,587.46
Field Operations	\$ 1,573,579.86	\$ 1,343,955.86
Total	\$ 2,824,619.20	\$ 2,395,543.32

**c. What is the average annual cost for disconnection and reconnection by year?**

Cost Type	Total Cost Incurred	
	2018	2019
Disconnection	\$ 126.49	\$ 150.48
Reconnection	\$ 68.84	\$ 69.39
Combined	\$ 99.31	\$ 112.07

**d. If your company has deployed advanced metering infrastructure (AMI), please provide separately a cost breakdown of disconnection and reconnection fees for residential customers with AMI meters installed. Please also provide a side-by-side comparison of costs incurred both to disconnect and reconnect non-communicating meters with costs incurred to disconnect and reconnect AMI meters.**

Puget Sound Energy has begun deploying advanced metering infrastructure (AMI). The deployment is ongoing through 2024. The cost of disconnection and reconnection fees for residential customers with AMI meters is \$0.

Customers that have elected to have a non-communicating meter (NCM) meter are required to pay the ongoing administrative and operational cost associated with the manual reading of the non-communicating meter, and other fees and charges associated with the non-communicating metering service that may be assessed for each eligible meter. There is a one-time charge of \$90 for each NCM meter for Electric, \$50 for each NCM meter for Gas, and an additional bi-monthly service charge of \$15 per NCM meter. There are Terms and Conditions the customer needs to maintain in order to continue service with an NCM meter, if they do not meet the terms the meter may be

switched out to an AMI meter, or at any time the customer may also request the meter be switched out with advance notice to the Company.

**4. Please provide the following information related to residential disconnections for non-payment in 2018 and 2019, respectively.**

**a. The number of disconnections**

CUSTOMER TYPE	# OF DISCONNECTIONS	
	2018	2019
Residential	47,708	39,644

**b. The average duration of disconnection**

PSE is not able to break this data down any further than whole day increments (meaning if a customer was disconnected and reconnected same day, PSE will display this as 0 as we cannot provide the data at an exact hour/min/sec breakdown). The vast majority of customers are reconnected the same day or next day. Customers whose reconnection occurred more than 30 days post disconnection have been excluded from the average. This eliminates the minimal severe outliers which are likely data quality issues (e.g. reconnection date or disconnection date populated incorrectly in the data, disconnection cycle number populated incorrectly, or commercial customer incorrectly identified as residential, etc.).

CUSTOMER TYPE	AVERAGE DURATION (DAYS)	
	2018	2019
Residential	1.9	1.9

**c. The average duration of disconnection for non-payment for low-income customers each year?**

PSE is not able to break this data down any further than whole day increments (meaning if a customer was disconnected and reconnected same day, PSE will display this as 0 as we cannot provide the data at an exact hour/min/sec breakdown). The vast majority of customers are reconnected the same day or next day. Customers whose reconnection occurred more than 30 days post disconnection have been excluded from the average. This eliminates the minimal severe outliers which are likely data quality issues (e.g. reconnection date or disconnection date populated incorrectly in the data, disconnection cycle number populated incorrectly, or commercial customer incorrectly identified as residential, etc.).

Low-income is defined as anyone who received PSE HELP, LIHEAP, or Salvation Army pledge assistance during calendar years 2018 and 2019. The timeframe is determined by the clearing date of the pledge (i.e. when it cleared the customer's account).

		AVERAGE DURATION (DAYS)	
CUSTOMER TYPE	2018	2019	
Residential	1.8	1.8	

**5. Please provide the following information regarding disconnections among low-income residential customers:**

a. In each of 2018 and 2019, what percentage of total residential customer disconnection fees and reconnection fees were charged to low-income customers? Please identify the percentage for each fee category separately.

		YEAR	
CUSTOMER TYPE	FEE TYPE	2018	2019
Residential	Disconnection Visit Fees	8.8%	9.0%
	Reconnection Fees	8.6%	5.1%

b. What percentage of customers facing disconnection successfully applied for and received energy assistance that allowed them to avoid disconnection in 2018 and 2019, respectively?

The data below represents the percentage of customers who hit PSE's disconnect queue in 2018 and 2019 and also received energy assistance (LIHEAP, PSE HELP, and/or Salvation Army) in 2018 and/or 2019. Please note, the denominator used for this question represents any customer who reached PSE's disconnect queue, i.e. this is any customer who was eligible for disconnect. It does not mean they all would actually have been disconnected.

		YEAR	
CUSTOMER TYPE	2018	2019	
Residential	8.1%	7.7%	

**6. Please identify barriers you have encountered to payment for low-income customers, members of highly impacted communities, and/or vulnerable populations. For the companies, what steps has your company taken to address identified barriers, if any? Please describe the results of these steps and provide any data you have relied upon for this analysis.**

PSE has not collected any data at this time that would identify barriers to payment for low-income customers, members of highly impacted communities, and/or vulnerable populations. PSE also employs email marketing campaigns messaging on the company website and app, in-language videos on social media, and digital banner ads that target audiences by zip code to ensure customers are informed about access to assistance. Additionally, PSE can segment messages by a variety of languages, including Spanish. To ensure PSE is reaching “in need” communities, PSE engages with community non-profits throughout its service territory to communicate energy assistance information to their clients, targeting areas with the

highest concentration of income qualified and language challenged customers. PSE provides written communications to these agencies in English, Spanish, Hindi, Mandarin, and Vietnamese to distribute to their clients who may need assistance.

**Deposits**

**7. Does your company currently collect deposits from residential customers?**

**a. If so, please identify all references in your tariff governing residential customer deposits.**

**Electric Tariff G (WN U-60):**  
 Schedule 80 Section 16 Deposits (Sheet No. 80-n)

**Natural Gas Tariff (WN U-2):**  
 Rule No. 5: Deposits

**8. Please provide the following information regarding the residential customer deposits collected by your company in 2018 and 2019, respectively:**

**a. Please provide the total dollar amount collected for residential customer deposits each year.**

PSE’s response reflects the dollars collected for residential security deposits that started in the year 2018 or 2019, and collected in any year. Deposits that started outside of 2018 or 2019, but had dollars collected in 2018 and 2019, are not shown in the counts below. For example, a customer’s security deposit started in December 2017 but they made the payment in January 2018. Additionally, this does not include dollars that were requested on security deposits but were not paid. This is only dollars that were requested as part of a security deposit and paid.

CUSTOMER TYPE	TOTAL \$ COLLECTED	
	2018	2019
Residential	\$ 27,905,477	\$ 10,319,106

**b. How many customer accounts paid deposits each year?**

PSE’s response reflects customers who had security deposits that began in the year 2018 or 2019 with payment amounts > \$0 on their requested security deposit. Customers who did not pay any of the requested security deposit are not reflected in numbers below.

CUSTOMER TYPE	# CUSTOMERS	
	2018	2019
Residential	149,182	62,319

**c. What percentage of retail revenue did your company derive from residential customer deposits each year?**

Customer security deposits are not considered "retail revenue" as they are held by the company and then returned to the customer and/or applied to a customer's invoice as applicable.

**d. How many customers used part or all their deposit to offset account balances?**

PSE cannot tell if the security deposit was returned to the customer or credited against an account. Both types of transactions can show up as "returned" as the funds were returned either via credit to the customer or credit to the account and cleared against an invoice.

CUSTOMER TYPE	# CUSTOMERS	
	2018	2019
Residential	105,757	102,932

**e. What percentage of customers who used part or all their deposit to pay for account balances each year requested reconnection within 12-months of disconnection?**

**PSE is interpreting this question as the following equation:**

$$\frac{\text{(Disconnect, deposit applied towards balance, customer requests reconnect)}}{\text{(Disconnect, deposit applied towards balance, request reconnect) + (Disconnect, deposit applied, stay disconnected, i.e. does not request reconnect in 12 months)}}$$

If a customer is disconnected, the deposit nets the final bill.

Greater than 99% of customers who used part or all of their deposit to pay for an account balance and were disconnected for non-payment requested reconnection within 12 months of disconnection.

CUSTOMER TYPE	# CUSTOMERS	
	2018	2019
Residential	99%	99%

**9. Please provide the following information regarding deposits among low-income customers in 2018 and 2019, respectively:**

**a. What percentage of customers who paid deposits were low-income customers?**

Low-income is defined as anyone who received PSE HELP, LIHEAP, or Salvation Army pledge assistance during the calendar years 2018 and 2019. The timeframe is determined by the clearing date of the pledge (i.e., when it cleared the customer's account).



% OF LATE FEES CHARGED TO LOW-INCOME CUSTOMERS		
CUSTOMER TYPE	2018	2019
Residential	8.5%	3.5%

**b. If possible, please identify the percentage of customers who paid deposits who are members of a highly impacted community or vulnerable population.**

The data used for vulnerable populations and highly impacted communities is reflective of 2021, American Community Survey (ACS), which is made up of 5 years' worth of data, PSE believes using this data against 2018 and 2019 historical years is an accurate reflection of vulnerable populations and highly impacted communities at that time. PSE was unable to match roughly 1.4% of customers who were charged late fees in 2018 and 2019 to the vulnerable population data. PSE was unable to match roughly 1.4% of customers who were charged late fees in 2018 and 2019 to highly impacted communities data. Please note that a customer could be a member of a highly impacted community and live in an area with a high concentration of vulnerable populations. Therefore, the numbers represented below are not additive.

% OF CUSTOMERS CHARGED LATE FEES WHO LIVE IN AN AREA WITH HIGH CONCENTRATION OF VULNERABLE POPULATIONS		
CUSTOMER TYPE	2018	2019
Residential	50.4%	54.6%

% OF CUSTOMERS CHARGED LATE FEES WHO LIVE IN A HIGHLY IMPACTED COMMUNITY		
CUSTOMER TYPE	2018	2019
Residential	34.3%	36.2%

**Late fees**

**10. Does your company’s tariff currently include a late fee for residential customers?**

**a. If so, please identify all the appropriate tariff references.**

**Electric Tariff G (WN U-60):**  
 Schedule 80, Section 31 Late Payment Fee (Sheet No. 80-Z.1)

**Natural Gas Tariff (WN U-2):**  
 Rule No. 9, Section 9 Late Payment Fee (Sheet No. 21-C)

**11. Please provide the following information regarding the late fees your company collected in 2018 and 2019, respectively:**

**a. Please provide the total dollar amount collected in late fees for each year.**

CUSTOMER TYPE	DOLLAR AMOUNT COLLECTED IN LATE FEES	
	2018	2019
Residential	\$ 1,859,432	\$ 1,655,745

**b. How many residential customer accounts paid late fees each year?**

CUSTOMER TYPE	# RESIDENTIAL CUSTOMER ACCOUNTS WHO PAID LATE FEES	
	2018	2019
Residential	519,465	501,985

**c. What percentage of retail revenue did your company derive from residential late fees each year?**

CUSTOMER TYPE	% OF RETAIL REVENUE FROM LATE FEES	
	2018	2019
Residential	0.056%	0.049%

**d. If late fees were no longer collected and were to be recovered in base rates instead, how much would residential bill increase based on your current approved rate spread? Please provide both a percentage increase and an average residential customer bill increase amount.**

Residential bill impacts were calculated using 900kWh for electric residential customers and 64 therms for residential gas customers. Residential bill impacts were calculated using 2018 data.

CUSTOMER TYPE	Average Bill	
	Bill Increase Percentage	Bill Increase Amount
Electric Residential	0.12%	\$ 0.12
Gas Residential	0.09%	\$ 0.06

**12. Please provide the following information regarding late fees affecting low-income customers in 2018 and 2019, respectively:**

**a. What percentage of late fees were charged to low-income customers each year?**

Low-income is defined anyone who received PSE HELP, LIHEAP, or Salvation Army pledge assistance during the calendar years 2018 and 2019. The timeframe is determined by the clearing date of the pledge (i.e. when it cleared the customer's account).

CUSTOMER TYPE	% OF LATE FEES CHARGED TO LOW-INCOME CUSTOMERS	
	2018	2019
Residential	12.4%	12.7%

**b. If possible, please identify the percent of customers charged late fees in each year who were members of a highly impacted community or vulnerable populations.**

The data used for vulnerable populations and highly impacted communities is reflective of 2021, American Community Survey (ACS), which is made up of 5 years' worth of data, PSE believes using this data against 2018 and 2019 historical years is an accurate reflection of vulnerable populations and highly impacted communities at that time. PSE was unable to match roughly 1.4% of customers who were charged late fees in 2018 and 2019 to the vulnerable population data. PSE was unable to match roughly 1.5% of customers who were charged late fees in 2018 and 2019 to highly impacted communities data. Please note that a customer could be a member of a highly impacted community and live in an area with a high concentration of vulnerable populations. Therefore, the numbers represented below are not additive.

CUSTOMER TYPE	% OF CUSTOMERS CHARGED LATE FEES WHO LIVE IN AN AREA WITH HIGH CONCENTRATION OF VULNERABLE POPULATIONS	
	2018	2019
Residential	41%	41%

CUSTOMER TYPE	% OF CUSTOMERS CHARGED LATE FEES WHO LIVE IN A HIGHLY IMPACTED COMMUNITY	
	2018	2019
Residential	30%	30%

### **Credit and Collection**

**13. Please provide all references in your company's tariff, and citations to all applicable rules and regulations, governing the credit and collection processes used by your utility.**

#### **Electric Tariff G (WN U-60):**

Schedule 80 Section 14 Payment of Bills (Sheet No. 80-m)  
Schedule 80 Section 16 Deposits (Sheet No. 80-n)  
Schedule 80 Section 17 Discontinuance of Service (Beginning on Sheet No. 80-O)  
Schedule 80 Section 18 Connection and Reconnection Charges (Sheet No. 80-R.1)  
Schedule 80 Section 29 Returned Item Charge (Sheet No. 80-Z)  
Schedule 80 Section 31 Late Payment Fee

#### **Natural Gas Tariff (WN U-2):**

Rule No. 5, Deposits  
Rule No. 9, Section 3 Payment Due Dates (Sheet No. 21)  
Rule No. 9, Section 4 Disconnection of Service (Sheet No. 21-A)  
Rule No. 9, Section 7 Connection and Reconnection Charges (Beginning on Sheet No. 21-B)  
Rule No. 9, Section 8 Returned Item Charge (Sheet No. 21-C)  
Rule No. 9, Section 9 Late Payment Fee (Sheet No. 21-D)  
Rule No. 9, Section 10 Disconnection Visit Charge (Sheet No. 21-D)  
Rule No. 15 Discontinuance of Service, Section 2 Discontinuance by the Company (Sheet No. 27)

**14. Please provide the following information regarding credit and collection:**

**a. A detailed narrative describing your company's credit and collection process. As part of this narrative, please identify both internal and external processes and explain how they operate, including any voluntary customer service principles;**

Puget Sound Energy's dunning process, which is our collection process, consists of phone outreach, mailed outreach, and door-to-door interactions. If a customer becomes past due after invoicing, our collections process considers several attributes to determine whether the customer enters into dunning. We look at the days in arrears, arrearage amount, and behavioral trends over the last 12 months (if that length of time is available), to calculate an overall score that determines if dunning will commence.

If the customer is eligible to dun, it begins with several phone outreach attempts. If we are unsuccessful at reaching the customer, they are mailed an urgent notice. Seven days later, they are mailed a Final notice. If the customer does not take positive action on their account, they may ultimately reach our disconnection queue.

When PSE starts up our disconnection process post Disconnect Moratorium, PSE will make a field collections visit to customers with a final notice, where we attempt to collect and promote options available for the customer to prevent a disconnection, such as payment plans and PSE energy assistance programs. If the customer is unable to enroll in a payment plan or seek energy assistance, electric service may be disconnected. Our "return to normal" processes as outlined in the AMI rule will not require a visit to all customers if they have an AMI remote capable meter, with the

exception of those customers who have received energy assistance in the prior two years or who have a medical condition and certificate.

PSE utilizes an internal collection team that conducts phone outreach for customers that are past due, on both active and closed accounts, and if a final bill is unpaid the account is written off or placed with an external collections agency. Balances of \$25 or more may be placed with an external collections agency for further collections treatment. We do not report to any credit reporting agency.

**b. If applicable, the number of customers sent to collections in each of 2018 and 2019; and**

PSE does not send active accounts to collections, only closed accounts. PSE uses a third- party vendor to attempt collections of unpaid balances and offer multiple payment options to customers. Whether PSE collects on the unpaid balance or not, these accounts are not reported to any of the credit bureaus (Experian, Trans Union or Equifax).

CUSTOMER TYPE	# CUSTOMERS SENT TO COLLECTIONS	
	2018	2019
Residential	68,424	58,346

**c. If applicable, the number of low-income customers who had account balances sent to collections in the year the customer received energy assistance.**

Low-income is defined as anyone who received PSE HELP, LIHEAP, or Salvation Army pledge assistance during the calendar years 2018 and 2019. The timeframe is determined by the clearing date of the pledge (i.e., when it cleared the customer's account). Not all customers below were disconnected for non-payment. For example, the customer could have moved and had their final bill on the old account sent to collections. PSE does not send active accounts to collections, only closed accounts. PSE uses a third- party vendor to attempt collections of unpaid balances and offer multiple payment options to customers. Whether PSE collects on the unpaid balance or not, these accounts are not reported to any of the credit bureaus (Experian, Trans Union or Equifax).

CUSTOMER TYPE	# CUSTOMERS SENT TO COLLECTIONS	
	2018	2019
Residential	1,691	1,399

**Disconnection Notices**

**15. Has your company identified opportunities to improve customer notice rules? Please describe those opportunities and the steps your company is taking to implement them.**

PSE has enhanced preference center options which allow the customer the flexibility to select other delivery options of notices, such as email and SMS.

**16. Please provide a list of all languages in which your company provides translated disconnection notices.**

Currently notices that are mailed USPS (Urgent and Final) are in English only. We are looking into expanding language options in the future. Today, communications on the web are available in multiple languages. Our process for web-based language options is based on the custom browser language settings set by our customers when visiting our website.

**17. How does your company determine in which language(s) the customer should receive written communications (particularly in relation to the disconnection notice)?**

Please see PSE's response to question #16.

**18. Has your company identified any barriers in the process of providing notices to customers?**

**a. If so, please identify and describe these barriers.**

Some barriers we have seen are the USPS requirement (WAC rule)<sup>1</sup>, address issues which cause customer mail to be returned, and potentially a lack of customer attention to their mail.

**b. Has your company taken steps to address any identified barriers?**

PSE has enhanced preference center options which allow the customer the flexibility to select other delivery options of notices, such as email and SMS.

**c. Have the steps taken either reduced the number of disconnections or otherwise yielded results in terms of improving the disconnection process? If so, please provide the results and any analysis your company has conducted of the results.**

Since the pandemic we are unable to track notable changes due to the fact disconnections have not resumed.

**19. Are you aware of any policies, rules, or guidance concerning equity in developing or providing customer notice in use by other companies or state commissions? If so, please identify the policies, rules, or guidance, referencing the company or state commission that has adopted the policy, rule, or guidance.**

At this time, PSE is not aware of any such policies, rules, or guidance concerning equity in developing or providing customer notice.

**20. Are you aware of any best practices or examples from other jurisdictions or other utility sectors that the Commission should consider in this proceeding regarding late fees, disconnection fees, reconnection fees, deposits, credit and collection practices, and customer notices? If so, please identify these best practices or examples, referencing the company or jurisdiction that has adopted these practices.**

---

<sup>1</sup> WAC 480-100-128 and 480-90-128

At this time, PSE is not aware of any such examples from other jurisdictions or utility sectors that the Commission should consider in this proceeding. Washington's unique prior obligation<sup>2</sup> rules impact PSE's processes with regard to disconnections. If the Commission is considering the permanent elimination of fees and deposits, it will need to consider those changes in light of the prior obligation rules.

Please contact Wendy Gerlitz at (425) 462-3051 for additional information about this filing. If you have any other questions, please contact me at (425) 456-2142.

Sincerely,

*/s/ Jon Piliaris*

Jon Piliaris  
Director, Regulatory Affairs  
Puget Sound Energy  
PO Box 97034, EST07W  
Bellevue, WA 98009-9734  
425-456-2142  
[Jon.Piliaris@pse.com](mailto:Jon.Piliaris@pse.com)

cc: Lisa Gafken, Public Counsel  
Sheree Carson, Perkins Coie

---

<sup>2</sup> WAC 480-90-123 (2) Gas Refusal of service, WAC 480-100-123 (2) Electric Refusal of service