

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-220066 and UG-220067
(Consolidated)

EXHIBIT APR-3

PSE Response to TEP DR 119

December 8, 2023

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**Dockets UE-220066 & UG-220067
Puget Sound Energy
2022 General Rate Case****THE ENERGY PROJECT DATA REQUEST NO. 119:****Reference: Wallace, CLW-13T at 19, Table 2**

- A. Please clarify whether the table focuses only on residential arrearages, or whether C&I arrearages are included. If C&I figures are included, please separate the data into two tables such that one table provides the information in Table 2 for Residential customers while the other Table provides the same information for C&I customers.
- B. Please clarify whether the “Amount Past Due” column represents incremental figures not collected in a previous phase. For example, in Phase 4, does the “Amount Past Due” figure for customers at the >\$250 threshold include those who owe between \$250-\$499, those who owe over \$1000 and earn under 200% FPL, and those who are estimated to begin owing between \$500-\$999 after May 2024? If this is not the correct way to interpret the table, provide the estimated amount past due for customers in Phases 2-5 (ie, excluding Phase 1 customers). If C&I customers are included in the table, provide separate figures for Residential vs. C&I customers.
- C. Please update Table 2 (and the Tables provided in part A, as necessary) using most recent figures as of October 31, 2023.
- D. In Phase 4, please estimate the total arrearages expected for customers owing over \$1,000 and earning below 200% FPL. If C&I customers are included in the table, please provide separate figures for Residential vs. C&I customers.

Response:

- A. Table 2 in Exh. CLW-13T includes both Residential and Commercial & Industrial (“C&I”) arrearages. Please find below two tables, which separate Table 2 in Exh. CLW-13T into Residential (Table A-1) and C&I (Table A-2) arrearages, respectively. Please note that these tables rely on the same timeframe as Table 2 in Exh. CLW-13T and use data current as of September 30, 2023. Additionally, for C&I customers, there is no Income Threshold applied because Puget Sound Energy (“PSE”) does not maintain income estimates for C&I customers.

Table A-1: Residential Customers (09/30/2023)

Phase	Dollar Threshold	Income Threshold	Est. New Customers in Dunning	Amount Past Due	Est. New Customers Reaching Disconnect Queue	Est. New Customer Disconnects for Non-payment
1 (Current)	>\$1000	Above 200% FPL	15,232	\$29,914,066	6,397	384
2 (Nov 2023 – Jan 2024)	\$750 - \$999	Above and below 200% FPL	15,946	\$13,893,453	6,697	402
3 (Jan – May 2024)	\$500 - \$749	Above and below 200% FPL	20,078	\$12,392,118	8,433	506
4 (May – Jun 2024)	\$250 - \$499	Above and below 200% FPL	33,822	\$12,132,268	14,205	852
5 (Jun 2024 onward)	\$150 - \$249	Above and below 200% FPL	26,675	\$5,186,851	11,204	672

Table A-2: C&I Customers (09/30/2023)

Phase	Dollar Threshold	Income Threshold	Est. New Customers in Dunning	Amount Past Due	Est. New Customers Reaching Disconnect Queue	Est. New Customer Disconnects for Non-payment
1 (Current)	>\$1000	N/A	2,127	\$13,537,625	893	54
2 (Nov 2023 – Jan 2024)	\$750 - \$999	N/A	911	\$790,881	383	23
3 (Jan – May 2024)	\$500 - \$749	N/A	1,184	\$733,856	497	30
4 (May – Jun 2024)	\$250 - \$499	N/A	1,932	\$695,249	811	49
5 (Jun 2024 onward)	\$150 - \$249	N/A	1,140	\$224,377	479	29

B. In Phase 4 the “Amount Past Due” figure, and all other columns, only include customers with a past due total between \$250-\$499. Similarly, in Phase 5, the “Amount Past Due” figure, and all other columns, only include customers with a past due total between \$150-\$249. Please note that PSE has clarified the labels under the “Dollar Threshold” column in all tables in this response to reflect this information. Therefore, the amount past due for customers in Phases 2-5 does not include any amount from customers in Phase 1.

Please see PSE’s Response to The Energy Project Data Request No. 119(A) for figures separated between Residential and C&I customers.

C. Please find below tables that update Table 2 in CLW-13T using current arrearages as of October 31, 2023. These include the combined table (C-1), a table for only Residential customers (C-2), and a table for C&I customers (C-3).

Table C-1: Combined Residential and C&I Customers (10/31/2023)

Phase	Dollar Threshold	Income Threshold	Est. New Customers in Dunning	Amount Past Due	Est. New Customers Reaching Disconnect Queue	Est. New Customer Disconnects for Non-payment
1 (Current)	>\$1000	Above 200% FPL	17,937	\$43,829,455	7,534	452
2 (Nov 2023 – Jan 2024)	\$750 - \$999	Above and below 200% FPL	16,379	\$14,262,235	6,879	413
3 (Jan – May 2024)	\$500 - \$749	Above and below 200% FPL	21,086	\$13,017,148	8,856	531
4 (May – Jun 2024)	\$250 - \$499	Above and below 200% FPL	35,458	\$12,738,912	14,892	894
5 (Jun 2024 onward)	\$150 - \$249	Above and below 200% FPL	27,836	\$5,437,692	11,691	701

Table C-2: Residential Customers (10/31/2023)

Phase	Dollar Threshold	Income Threshold	Est. New Customers in Dunning	Amount Past Due	Est. New Customers Reaching Disconnect Queue	Est. New Customer Disconnects for Non-payment
1 (Current)	>\$1000	Above 200% FPL	15,918	\$30,748,371	6,686	401
2 (Nov 2023 – Jan 2024)	\$750 - \$999	Above and below 200% FPL	15,456	\$13,465,778	6,492	389
3 (Jan – May 2024)	\$500 - \$749	Above and below 200% FPL	19,925	\$12,301,943	8,369	502
4 (May – Jun 2024)	\$250 - \$499	Above and below 200% FPL	33,429	\$12,010,953	14,040	842
5 (Jun 2024 onward)	\$150 - \$249	Above and below 200% FPL	26,629	\$5,199,736	11,184	671

Table C-3: C&I Customers (10/31/2023)

Phase	Dollar Threshold	Income Threshold	Est. New Customers in Dunning	Amount Past Due	Est. New Customers Reaching Disconnect Queue	Est. New Customer Disconnects for Non-payment
1 (Current)	>\$1000	N/A	2,019	\$13,081,084	848	51
2 (Nov 2023 – Jan 2024)	\$750 - \$999	N/A	923	\$796,457	388	23
3 (Jan – May 2024)	\$500 - \$749	N/A	1,161	\$715,205	488	29
4 (May – Jun 2024)	\$250 - \$499	N/A	2,029	\$727,958	852	51
5 (Jun 2024 onward)	\$150 - \$249	N/A	1,207	\$237,956	507	30

- D. Phase 4 only includes customers who owe between \$250-499. Therefore, the total arrearages expected for customers owing over \$1,000 and earning below 200% Federal Poverty Level is \$0.