

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

Puget Sound Energy

Respondent.

DOCKETS UE-220066, UG-220067, and UG-210918 (*Consolidated*)

**COREY J. DAHL
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT CJD-15

Puget Sound Energy Response to Public Counsel Data Request No. 430

December 8, 2023

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-220066 & UG-220067
Puget Sound Energy
2022 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 430:

REQUESTED BY: David Konisky

Re: Docket U-210800, Presentation Materials of David Konisky for the Credit and Collections Workshop filed June 22, 2023.

Research conducted and presented by Dr. Konisky demonstrates higher rates of disconnections with households with children under 5 years of age. Does PSE contest these findings? Please explain your answer with particularity.

Response:

Puget Sound Energy (“PSE”) neither contests nor concurs with the referenced study. PSE would like to point out that the referenced study took place in different geographic regions with different customer demographics and dunning processes. PSE does not use household-level demographic information such as presence of children as a determinant in any dunning or disconnection action taken.