

**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-5

Puget Sound Energy Response to Public Counsel Data Request No.

431, with First Supplemental Response

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. 431:

REQUESTED BY: David Konisky

Re: Testimony of Carol L. Wallace, Exh. CLW-13T, at 15:8–12.

Is the Company conducting any “urgent, direct, and targeted” outreach outside of the dunning and disconnections process? Please explain with particularity. If answering no, please explain with particularity why the Company is not conducting such outreach and provide citations to Commission Order, rule, or statute as necessary.

Response:

Puget Sound Energy (“PSE”) is conducting outreach in many forms (see Exh. CLW-25 – Bill Discount Rate Outreach Presentation). The specific “urgent, direct and targeted” outreach referenced in the testimony of Carol L. Wallace, Exh. CLW-13T, is related to PSE’s dunning process. It includes information about the individual customer’s arrearage situation and specific actions available for the customer to avoid a service disconnection. Please see PSE’s Response to WUTC Data Request No. 311 for more details on the various types of outreach performed by PSE.

**PSE'S FIRST SUPPLEMENTAL RESPONSE TO
PUBLIC COUNSEL DATA REQUEST NO. 431**

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First Supplemental Response:

Puget Sound Energy (“PSE”) conducts outreach in many forms, and PSE has conducted direct and targeted outreach in an effort to reduce the large number of arrearages. See, for example, Exh. CLW-25 – Bill Discount Rate Outreach Presentation. Please also see PSE’s Response to WUTC Staff Data Request No. 311 for more details on the various types of outreach performed by PSE. Further, in March 2023, PSE reached out to 68,000 customers who were between \$250 and \$999 past due more than 30 days to advise them of the options available to assist them with their past due accounts.

Despite the many direct and targeted outreach efforts, PSE has been unable to drive customer action to reduce arrearages. The dunning process (see Attachment A to PSE’s comments dated September 26, 2023, and named “PSE Credit and Collection Processes Flowcharts (09-26-2023)” in Docket U-210800) necessarily involves the urgency, via phone calls and urgent and final notices, required to drive such action. That specific “urgent, direct and targeted” outreach is the outreach referenced in the testimony of Carol L. Wallace, Exh. CLW-13T, as provided below:

The status quo is not working to address the unprecedented arrearages. Restarting the urgent, targeted, and direct outreach through the dunning process is critical for educating customers about their responsibility to pay for balances, making them aware of the current and growing past-due balances, and for motivating customers to take actions to address their past-due balances.¹

¹ Exh. CLW-13T:15:8-12.

Therefore, while PSE continues to perform direct and targeted outreach, it is not conducting “urgent, direct, and targeted” outreach outside of the dunning process. The dunning process provides messaging that, based on historical experience, better motivates customers to take positive action(s) on their account.