

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

Puget Sound Energy

Respondent.

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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**

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**EXHIBIT CJD-6**

Puget Sound Energy Response to WUTC Staff Data Request No. 311

**December 8, 2023**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**WUTC STAFF DATA REQUEST NO. 311:**

REQUESTED BY: Jacque Hawkins-Jones

**RE: PSE Petition to Amend Final Order**

PSE states that amending Order 24 “will also allow PSE to change or expand its customer notification and outreach efforts, including helping customers apply for assistance or make long-term payment plans.”<sup>1</sup> Elsewhere in the petition, the Company also states “holding dunning to Phase 1 also means that PSE is unable to expand its customer and outreach practices aimed at addressing the arrearages.”<sup>2</sup>

Please provide documents or a narrative description that explain why PSE cannot change or expand its customer notification and outreach efforts, or help customers apply for assistance and make long-term payment plans absent this amendment to Final Order 24.

**Response:**

Puget Sound Energy (“PSE”) has different types of outreach. The outreach PSE was referring to in its Petition to Amend Order 24 was regarding past-due communication outreach that targets customers so they are specifically aware of their past-due balance and options available to them to get back on track. PSE has a comprehensive communications and outreach for customers with past-due balances. This includes phone outreach, mailed outreach, and door-to-door interactions where PSE personnel discusses programs available such as energy assistance and extended payment plans. This particular outreach begins when a customer enters into the dunning process and, therefore, the outreach has not been occurring for the majority of past-due customers that today are not meeting the \$1,000 eligibility threshold limits of Phase 1 dunning process. The same is true for those customers who have been removed from the dunning process if they were known low-income customers or estimated low-income customers. As an outcome of PSE’s 2022 general rate case (“GRC”) Settlement Agreement, PSE has been required to hold dunning to the first phase, which excludes customers with a balance lower than \$1,000 dollars and removed known and estimated low-income customers, until the conclusion of Docket U-210800 (which has been

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<sup>1</sup> PSE petition to amend Final order 24 at pages 10-11, para 17.

<sup>2</sup> PSE petition to amend Final order 24 at page 7, para 10.

delayed multiple times since the Settlement Agreement was filed and since Final Order 24 was issued). Therefore, PSE stated in its Petition that “holding dunning to Phase 1 also means that PSE is unable to expand its customer and outreach practices aimed at addressing the arrearages,” without violating the Settlement Agreement.

PSE can and has expanded other types of outreach that are targeted more around awareness of program offerings (including energy assistance programs). This is typically a more broad communication that is sent to a group of customers, as opposed to the above communication outreach that is more tailored to the customers with past-due balances about their past-due balances (arrearages) and actions they can take to get back on track (such as signing up for assistance and/or extended payment plans).