EXHIBIT NO. \_\_\_\_\_ (AML-13T)

DOCKET NOS. UE-170033/UG-170034

2017 PSE GENERAL RATE CASE

WITNESS: AMANDA M. LEVIN

BEFORE THE WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

|  |  |  |
| --- | --- | --- |
| WASHINGTON UTILITES AND TRANSPORTATION COMMISSION,  Complainant,  v.  PUGET SOUND ENERGY,  Respondent. |  | DOCKET NOS. UE-170033  and UG-170034 (*Consolidated)* |

EXHIBIT AML-15 TO THE

CROSS-ANSWERING TESTIMONY (NON-CONFIDENTIAL) OF

AMANDA M. LEVIN

ON BEHALF OF NORTHWEST ENERGY COALITION, RENEWABLE NORTHWEST, AND NATURAL RESOURCES DEFENSE COUNCIL

NON-CONFIDENTIAL

August 9, 2017

**Docket Nos. UE-170033 and UG-170034**

**Puget Sound Energy**

**2017 General Rate Case**

**FEA’s Responses to the**

**First Set of Data Requests of**

**NW Energy Coalition, Renewable Northwest, and**

**Natural Resources Defense Council to FEA**

**NWEC/RNW/NRDC Data Request No. 003 to FEA:**

Please refer to page 8, lines 14-17, of the response testimony of Ali Al-Jabir. Does Mr. Al-Jabir have any empirical evidence that the quality of the customer service provided by PSE has declined as a result of decoupling? If so, please provide all such evidence.

**FEA’s Response:**

Mr. Al-Jabir is not aware of any studies that have attempted to quantify the impact of decoupling on the quality of customer service in PSE’s service territory. However, as a general matter, the motivation of any private business to provide quality customer service is closely linked to its desire to retain existing customers and to attract new customers in order to expand its revenue stream. All else being equal, mechanisms such as decoupling adversely impact a utility’s incentive to provide quality customer service by rendering the utility financially neutral with respect to the sales volumes for its product.