



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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January 30, 2024

**NOTICE OF BENCH REQUESTS**  
**(Due by Friday, February 09, 2024, at 5 p.m.)**

RE: *Washington Utilities and Transportation Commission v. Puget Sound Energy*,  
Dockets UE-220066, UG-220067, and UG-210918 (Consolidated)

**BENCH REQUEST NO. 3:**

TO PUGET SOUND ENERGY (PSE or Company):

In its supplemental response to Public Counsel Data Request No. 431, admitted into evidence as Exhibit CJD-5, PSE noted that in March 2023, the Company conducted outreach to 68,000 customers. As a class, these customers were past due more than 30 days with balances between \$250 and \$999. The purpose of this communication was to advise the customers of the options available to assist them with their past due amounts. Please provide the following information related to this outreach:

- a. Provide a copy of the postcard that was mailed to the approximately 68,000 past due customers in March 2023, including versions translated into other languages and including the mailing dates of these postcards.
- b. Please provide information as to whether these 68,000 customers, noted above, were known low-income, estimated low-income, members of highly impacted communities, members of vulnerable populations, or falling into the category of deepest need. If the Company does not possess customer-specific data to allow a full response to this subpart of Bench Request No. 3, please provide the Company's best estimate as to what proportion of these customers are known low-income or fall under other categories discussed immediately above.

**BENCH REQUEST NO. 4:**

TO PSE:

Exhibit CLW-26 appears to be a presentation of the phased Dunning Approach presented to the Low Income Advisory Committee.

- a. Please provide the date on which this presentation was made to the LIAC.
- b. Please provide the members of the LIAC present when this presentation was delivered.

**BENCH REQUEST NO. 5:**

TO PSE:

Carol Wallace testifies that “[a]s of October 31, 2023, PSE has 262,518 customers who are past due on their energy bills, totaling \$140,410,727 in arrears.” Wallace, Exh. CLW-13T at 4:16-17. *See also* Wallace, Exh. CLW-14.

- a. Please confirm whether PSE’s arrearage balance, as noted above, includes arrearages less than 30 days overdue.
- b. If PSE does include arrearages less than 30 days overdue, as noted above:
  - i. Please explain why PSE includes amounts less than 30 days overdue in its calculated arrearage balance.
  - ii. Please explain why the Commission should rely on the calculated total provided by Wallace as evidence of PSE’s total arrearage balance when other investor-owned utilities in Washington state do not appear to include amounts less than 30 days overdue in their calculated arrearage balances in their submissions in Commission Docket U-210800.
- c. Please complete the tables below related to arrearage data. In providing the Company’s response to this subpart, please complete the attached Excel spreadsheet leaving any formulas and/or calculations used in the spreadsheet. Details for the requested data can be found on the blue shaded cells. The green shaded cells should be returned with PSE’s response.

Please provide customer counts as of Dec. 31, 2021 for each of the classes below broken down by each vintage of 0-30, 31-60, 61-90, and 91+ days.					
Customer Accounts with Arrearages (As of Dec. 31, 2021)					
	0-30 days	31-60 days	61-90 days	91+ days	Total (Counts)
All Active Residential					
All Closed Residential					
All Active Known-Low Income					

All Active Estimated Low Income					
All Active Named Community					

Please provide arrearage amounts as of Dec. 31, 2021 for each of the classes below broken down by each vintage of 0-30, 31-60, 61-90, and 91+ days.					
Arrearage Amounts (As of Dec. 31, 2021)					
	0-30 days	31-60 days	61-90 days	91+ days	Total (Dollars)
All Active Residential					
All Closed Residential					
All Active Known-Low Income					
All Active Estimated Low Income					
All Active Named Community					

**BENCH REQUEST NO. 6:**

TO PSE:

In response to Public Counsel Data Request No. 441, admitted into evidence as Exhibit CJD-4, PSE provides aggregated outreach data for accounts with past-due balances for the years 2022 and year-to-date 2023.

During the hearing, PSE witness Carol Wallace testified that limitations in staffing and resources required a phased approach to expanding dunning practices. Wallace also testified that the Company believed it was unable to reach out to customers whose arrearage was below \$1,000.

- a. Please identify the number of employees and individuals employed on a contract basis that PSE maintained in 2023 for customer outreach related to arrearages.
- b. Since the signature date of the Revenue Requirement Settlement on August 26, 2022, please explain whether PSE's customer outreach teams, including employees and any contractors, has been operating at full capacity, or whether it has been operating under-capacity due to PSE's interpretation of the settlement agreement.

**BENCH REQUEST NO. 7:**

TO PSE:

Witness Wallace outlines PSE's phased approach in Table 2 of Revised Rebuttal Testimony CLW-31Tr at 17. Table 2 proposes to implement a phased approach that would result in approximately 129,000 new customers entering the dunning process. Please provide estimated costs (using estimates as applicable) for PSE to implement each phase? Potential costs may include the following:

- a. Additional postage and materials,
- b. Wages for representatives to respond to increased customer contacts in response to increased dunning activities,
- c. Increased costs incurred by Community Action Agencies to address increased workloads,
- d. Costs to dispatch representatives to disconnect and reconnect customers and,
- e. Any other ancillary or administrative costs? If there are other costs, please specify the nature of those costs.

**BENCH REQUEST NO. 8:**

TO PUBLIC COUNSEL:

Professor David Konisky discusses the Commission's requirement for quarterly reporting on disconnections, COVID-era disconnection moratoriums, and data compiled by the Energy Justice Lab regarding reported disconnections in other states. *See, e.g.*, Konisky, Exh. DK-1T at 6:18-7:4.

- a. Please explain how disconnection moratoria and other customer protections required by the Washington Utilities and Transportation Commission compare to protections afforded customers in other states.
- b. Please identify any regulatory bodies in the United States that currently prohibit any disconnections for nonpayment.

**BENCH REQUEST NO. 9:**

TO THE ENERGY PROJECT (TEP):

Witness Stokes offers an alternative recommendation in Term 04 that outlines protections for certain classes of customers. Term 05 of this recommendation at Stokes, Exh. SNS-1T at 34:1-5 would allow for customers to self-attest to their status; places the burden of proof on the utility to determine any improprieties with the individual attestations; and would then turn-in these cases to the Commission for review. Under this alternative recommendation, it appears the Commission would determine if a disconnection is warranted on a case-by-case basis.

- a. Since the requirements outlined in Term 05 require some degree of personal and financial information, would this be a process better suited for the Community Action Agencies to verify customer attestations?
- b. Has TEP conducted any type of analysis or estimate of the costs that would be incurred by the Community Action Agencies for the processes covered in Term 04 and Term 05 of the alternative recommendation? If so, please provide the cost study TEP prepared estimating the costs for such a process?
- c. If no cost study has been conducted, please provide an estimate of the costs that would be incurred by the Community Action Agencies to carry out the process outlined in Term 05?
  - i. Additional postage and materials,
  - ii. Wages for representatives to respond to increased customer contacts in response to increased dunning activities,
  - iii. Increased costs incurred by Community Action Agencies to address increased workloads,
  - iv. Any other ancillary or administrative costs? If there are other costs, please specify the nature of those costs.

**BENCH REQUEST NO. 10:**

TO STAFF:

During the Evidentiary Hearing for this filing, Staff witness Hawkins-Jones confirmed support for The Energy Project's alternative recommendation including Term 04 and Term 05 proposed by Witness Stokes in testimony at Stokes, Exh. SNS-1T at 33:13-31 and 34:1-5.

- a. Has Staff conducted any analysis or estimate of the costs that Commission Staff would incur for the processes covered in Term 04 and Term 05 of the alternative recommendation? If so, please provide the cost analysis or study Staff prepared estimating the costs for such a process?
- b. If no cost estimate has been conducted, please provide an estimate for the costs that would be incurred by the Commission to carry out the process outlined in Term 05?
  - i. Additional postage and materials,
  - ii. Wages for representatives to respond to increased customer contacts in response to increased dunning activities,
  - iii. Increased costs incurred by Commission Staff to address increased workloads,
  - iv. Any other ancillary or administrative costs? If there are other costs, please specify the nature of those costs.

Please respond to these Bench Requests no later than Friday, February 09, 2024, by 5 p.m., by electronic filing with the Commission's Records Center. Please provide courtesy email copies to all parties and the presiding administrative law judge. If you have any questions

concerning these requests, please contact Administrative Law Judge Michael Howard at 360-664-1139 or via email at [michael.howard@utc.wa.gov](mailto:michael.howard@utc.wa.gov).

*/s/ Michael Howard*  
MICHAEL HOWARD  
Administrative Law Judge

cc: All Parties