

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**BENCH REQUEST NO. 7:**

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.

**Response:**

Puget Sound Energy ("PSE") does not anticipate any rate impacts by implementing the proposed phased approach.

- a. The number of customers who may reach noticing will vary because PSE's phased approach is based on an estimation of customers and not all customers who enter dunning will reach the level of a notice. That may be for a couple of reasons, such as; the customer pays their past-due payment, they enter into a payment plan, or they seek assistance. Any one of these will remove the customer from dunning. If PSE were to assume all 129,000 customers were to receive an urgent notice and a final notice, the combined cost for postage would be approximately \$170,000. For other materials like field door hangers, the cost would be approximately \$12,000. However, at this time PSE does not anticipate any additional charges because the estimated number of customers entering dunning who are likely to require additional postage and material costs is within the planned customers requiring such outreach.

- b. Based on implementing the phased approach, there would not be any additional wage costs for increased customer contacts in response to increased dunning activities.
- c. Based on implementing the phased approach, there would not be any additional costs incurred by Community Action Agencies because they are contracted to receive a percentage of benefits awarded to customers, and that amount is not expected to change.
- d. Based on implementing the phased approach, there would be no field activity cost increases. PSE's existing field personnel would be dispatched as necessary to complete the work.
- e. PSE is not anticipating any ancillary or administrative costs at this time. As stated above, there will be no costs or rate increases by implementing PSE's phased approach.