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February 16, 2024

Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

**Re: Puget Sound Energy 2022 General Rate Case – Petition to Amend Final Order
Dockets UE-220066/UG-220067/UG-210918**

Dear Director Killip:

Puget Sound Energy (“PSE”) submits this letter in response to Public Comment Exhibit No. BR-11, submitted by Public Counsel in this proceeding on February 15, 2024. PSE does not object to admission of the exhibit, but it would like to take this opportunity to encourage the Commission to consider the actual public comments rather than the tally results indicating whether the comment opposes, supports, or is undecided about PSE’s Petition to Amend Final Order (“Petition”).

Exhibit BR-11 includes an Offer of Public Comment Exhibit, attachments containing all public comments received by the Commission or Public Counsel in this proceeding, and Public Counsel’s tally of comments workpaper, which totals how many comments oppose, support, or are undecided about Commission approval of PSE’s Petition. The tally results show that of the 223 total and unique public comments, 163 oppose the Commission’s approval of PSE’s Petition.¹ However, upon review of those 163 comments, it becomes obvious that most support the outcome PSE is proposing in this proceeding. Therefore, accepting the tally results without reviewing the underlying comment may result in mischaracterizing or misinterpreting the substance of the comment.

For example, the following comments were tallied as “Opposed” to the Commission’s approval of PSE’s Petition:

- “Please note that as a longtime customer of Puget Sound Energy, who has consistently and fully paid on time our bills to PSE, I strongly object to being charged extra to cover the costs of customers who do not pay their bills to PSE.

¹ Exh. BR-11, Offer of Public Comment Exhibit at ¶ 6.

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It's unethical to even have this expectation! Please, seriously consider denying this terrible proposal.”²

- “The customer believes PSE is a reliable service provider that is fair and reasonable. Has been a customer for over 60 years always paying bill on time. The customer asks the commission to accept the petition from PSE to resolve past due balances as quickly as possible to prevent the need to raise the rates on loyal paying customers.”³
- “I understand we’re at risk for PSE increases due to the company trying to recover lost profit from folks who do not pay. I wanted to say PSE should focus their collection efforts on people who don’t pay, not the people who pay. I don’t think it’s fair for those of us who are on top of our payments.”⁴

As you can see, several comments tallied as “Opposed” apparently support approval of PSE’s Petition and are therefore inconsistent with their assigned tally.

In closing, PSE does not object to admission of Exhibit BR-11; rather, PSE simply requests the Commission apply greater weight to the comments themselves than to the tally numbers because the comments themselves better capture their meaning and illustrate the nuance and complexity of managing the impact of growing arrearages.

Sincerely,



Donna Barnett

DLB:dc

cc: All parties

² Exh. BR-11, Attach. 1 at p. 2.

³ It is unclear why this comment was tallied as “Opposed” because it clearly requests that the Commission accept the petition. Yet, it is nonetheless tallied as “Opposed”. See Exh. BR-11, Attach. 1 at p. 5.

⁴ Exh. BR-11, Attach. 1 at p. 32.