

ATTORNEY GENERAL OF WASHINGTON

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June 12, 2024

Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
P.O. Box 47250
Olympia, WA 98503-7250

Re: Washington Utils. and Transp. Comm'n v. Puget Sound Energy Dockets UE-220066, UG-220067, UG-210918 (consolidated)

Dear Mr. Killip:

On May 16, 2024, the Commission entered Order 32/18 in the above referenced dockets. Order 32, among other things, required PSE to file: (1) revised tariff pages that reflected the Commission's grant of PSE's petition to modify Order 24/10 in these dockets, with conditions; and (2) an updated Table 2 from the testimony of Carol Wallace.

On May 28, 2024, PSE filed a revised Table 2 as well as revised tariff sheets to comply with Order 24/10.

Staff has reviewed the updated Table 2 and believes that it complies with the provisions of Order 24/10.

Staff has also reviewed the revised tariff sheets and, while they comply with the Commission's final order, Staff notes one issue. In Order 24/10, the Commission required PSE to engage in targeted outreach as part of the resumption of its dunning procedures. The Commission defined "targeted outreach" as a "telephone or written communication" that provides specified information to customers. Both PSE's revised Rule 9 and Schedule 80 are largely consistent with Order 24/10, providing that PSE "shall conduct targeted outreach in the form of a telephone or written (email) communication" that provides the specified information as part of resuming dunning. Staff's concern is that, in its tariff, PSE has limited itself to written communication by email, and would seemingly violate its tariff if it communicated through means such as letters or bill inserts. In this regard, Staff contacted PSE and confirmed that it intends to use such alternate forms of written communication to reach customers who do not have email addresses.

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Sincerely,

/s/ *Jeff Roberson*, WSBA No. 45550 Assistant Attorney General (360) 810-0509 jeff.roberson@utc.wa.gov

LJR/emd

cc: Parties