

Graciela Etchart  
06/22/99  
Energy Rules review and meeting

WE-990473

08:36:11 AM



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Subject: Energy Rules review and meeting

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Graciela, Jim, Steve and Vicki,

I received notice of the second meeting to review energy and consumer rules scheduled for June 24th. Unfortunately, I have to be in Portland for a prior commitment and therefore Public Counsel will be unable to attend.

Because I missed the initial meeting and have not received any materials, I'm not certain I'm on the interested parties list to receive mailings. Could you please verify for me that I am?

I offer the following preliminary points for your consideration, with apologies if you've already discussed them or if they are beyond the scope of your review. I realize we are in the very early days of this process and intend to be able to offer much more substantive and focused comments as we proceed.

1. Public Counsel suggests that any proposal which changes the rates paid by consumers does not belong in a rulemaking docket. We understand this docket to be about rules and policies, not about prices. If a utility wishes to charge more for disconnection, reconnection, or deposits, that matter is better addressed in a tariff filing or a rate case.

2. Public Counsel is concerned about the ability and effects of marking customers as low-income. Clearly any marking of customer records without adequate safeguards for confidentiality and non-discrimination has the potential to lead to redlining and unfair discrimination, and may have unforeseen consequences should a more competitive market for energy services develop in Washington.

At the same time, there is some sentiment to ensure that those customers who are truly burdened in their ability to pay be effectively targeted for programs to aid their payment and ensure that disconnections are minimized. I am uncertain as to how existing programs that serve this population (e.g. LIHEAP, WTAP) identify and reach the intended target population. Public Counsel is interested in exploring some innovative ways to meet the utility's apparent concerns with payment problems without further burdening customers' ability to pay.

Again, apologies for being unavailable for the upcoming meeting. I look forward to working on these issues with you as the summer progresses.

Thanks,

Matt

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