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VIA ELECTRONIC FILING

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

ATTENTION: Records Center

Re: Docket U-131087 – Inquiry to consider Whether Changes to WAC 480-100-128(k) and 480-90-128(k) are Warranted

Cascade provides the following comments regarding the Staff memo for addendum item A3, Docket U-131087. First, after the workshop on August 15, Cascade reviewed the data used to supply its responses to Staff data requests and realized one answer was incorrect. Unfortunately the data was heavily relied on by several parties during the workshop. Cascade subsequently, on August 28, 2013, submitted a revised response to Staff data request number 4 identifying the number of times collections were made in the field to avoid disconnection. As a result, the actual 2012 payments collected at the door were 2879 not 444. Therefore, the ratio that staff provided on page 2 of its memo should be less than 2 to 1 not 10 to 1.

Based on the revised data response and even though Cascade has not collected cash in field since 2005, the data indicates that customers are not adversely impacted at all. In fact, there has not been a single complaint to Cascade's knowledge regarding the practice of not collecting cash at the door to avoid disconnection.

Cascade also submits the following general comment summarizing its proposal to modify the above mentioned WACs. First and foremost Cascade reiterates that the priority of the proposal to modify the WACs is for the safety of its field personnel. Granted, as Staff points out, there have not been a significant number of instances identified in the past, however, should that prevent trying to avoid instances in the future? If this docket was simply about collecting cash or checks then certainly it makes absolutely the most sense to collect cash rather than checks, after all, cash doesn't bounce. It also doesn't make sense for the utilities to want to disconnect customers as disconnecting and reconnecting is in nobody's benefit and is costly. The proposal is about employee safety and as an added benefit changing customer behavior thus reducing costs for all customers. PacifiCorp presented information on how it has been successful in its other jurisdictions modifying customer expectations and behavior.

Staff concludes that that the ability to pay at the door to prevent disconnection is a vital consumer protection that must be preserved and modifying the rule to allow companies discretion would

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undermine the consumer protection aspect of the rule. Cascade respectfully disagrees. Allowing companies latitude does not mean undermining consumer protection. Cascade would expect to identify and follow specific processes and procedures that would be included in its tariff for Commission review and approval.

Cascade intends to participate in the Open Meeting on Thursday via the conference bridge line.

Sincerely,

Mike Parvinen,
Director, Regulatory Affairs