Service Date: August 28, 2024

BEFORE THE WASHINGTON UTLITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET UE-240087

Complainant,

ORDER 02

v.

PUGET SOUND ENERGY

Respondent,

INITIAL ORDER APPROVING AND ADOPTING SETTLEMENT AGREEMENT

BACKGROUND

- Revised Code of Washington (RCW) 80.28.080(1)(a) provides that "no electrical company . . . may charge, demand, collect or receive a greater or less or different compensation for any service rendered or to be rendered than the rates and charges applicable to such service as specified in its schedule filed and in effect at the time" On March 5, 2024, Commission staff (Staff) filed a complaint in this docket alleging that Puget Sound Energy (PSE or Company) violated RCW 80.28.080(1)(a), along with RCW 80.28.050, RCW 80.28.060(1), and WAC 480-100-028, by charging and collecting rates from customers under a tariff not properly approved by the Commission. ¹
- On December 27, 2022, PSE submitted a compliance filing in Docket UE-220066 following issuance of Commission Order 24/10 in Docket UE-220066.² This filing contained a tariff page for Schedule 52-B 12th Revision, amongst other schedules.³ This filing was rejected in part in Order 26/12 in Docket 220066.
- On January 9, 2023, PSE submitted a corrected compliance filing in Docket 220066.⁴ This filing did not contain a Schedule 52-B tariff sheet.⁵ The January 9th filing was approved and rates became effective on January 11, 2023.

¹ WUTC v. Puget Sound Energy, Docket UE-240087 Complaint 4 ¶¶ 16-22 (Mar. 5, 2024).

² Declaration of Jacque Hawkins-Jones at ¶ 3.

³ *Id*. at 3.

⁴ WUTC v. Puget Sound Energy, Dockets UE-220066, UG-220067, & UG-210918 consolidated, PSE's Electric Tariff Revision (Jan. 9, 2024).

⁵ Declaration of Jacque Hawkins-Jones at ¶ 3.

- Despite the January 9, 2023, filing not containing a Schedule 52-B, PSE began charging customers subject to Schedule 52-B the 12th Revision rate when the PSE tariff filing was approved on January 11, 2023.⁶
- On January 23, 2024, Staff received an email from a PSE employee working in rates and regulations regarding the missing Schedule 52-B tariff sheet. On January 24, 2024, Staff met with the PSE employee via virtual meeting conference to discuss how to address the issue of the missing tariff page. PSE explained that the tariff page was inadvertently left out of the filing, and that the rate in the 12th Revision of Schedule 52-B was being charged, even though the rate was not in the tariff. On January 24, 2024, Staff met with the PSE employee working in rates and regulations regarding the missing Schedule 52-B tariff sheet. On January 24, 2024, Staff met with the PSE employee working in rates and regulations regarding the missing Schedule 52-B tariff sheet.
- On February 2, 2024, Staff inquired with PSE about how much, in total, was charged under Schedule 52-B since January 11, 2023. On February 5, 2024, PSE responded that since January 11, 2023, \$927,785.34 had been collected from customers under Schedule 52-B. 12
- PSE informed Staff that as of February 5, 2024, PSE was charging customers under Schedule 52-B at the 12th Revision rate. ¹³ The last approved version of Schedule 52-B was the 11th Revision. The 11th Revision was also not in the January 9th filing. ¹⁴
- 8 On March 5, 2024, the complaint initiating this docket was filed, setting a prehearing conference for April 1, 2024.
- On March 25, 2024, Staff sent an email to the presiding officer in this matter notifying the Commission that Staff and PSE had reached a settlement in principle in this docket and that the settlement would be submitted by April 19, 2024. On that same day, counsel for PSE requested the Company's answer date be suspended. All parties were unopposed to PSE's request and requested that the April 1, 2024, prehearing conference be suspended.
- On March 26, 2024, the Commission issued Order 01 in this docket suspending the prehearing conference and PSE answer date.

⁶ Declaration of Betty Erdahl (hereinafter "Erdahl Decl.") at ¶ 6.

⁷ *Id.* at ¶ 4.

 $^{^{8}}$ *Id.* at ¶ 5.

⁹ *Id*.

¹⁰ *Id.* at ¶ 5-6.

¹¹ Hawkins-Jones Decl. at ¶ 5.

¹² *Id.* at ¶ 6.

¹³ *Id. See also* Erdahl Decl. at ¶ 6.

¹⁴ Hawkins-Jones Decl. Exh. 1.

On April 19, 2024, Staff submitted a joint settlement agreement (Settlement Agreement) and testimony in support of the Settlement Agreement. On that same day, PSE submitted testimony in support of the Settlement Agreement. Public Counsel is not a signatory to the Settlement Agreement.

- On May 5, 2024, the Commission issued a Notice of Settlement Hearing before Administrative Law Judge Connor Thompson and the Commissioners and set the hearing for July 24, 2024.
- On June 20, 2024, the Commission issued a second Notice of Settlement Hearing setting the hearing to take place virtually on July 24, 2024, before Administrative Law Judge Connor Thompson.
- On July 24, 2024, a Settlement Hearing was held in this matter.
- REPRESENTATIVES. David S. Steele and Byron C. Starkey represent Puget Sound Energy. Josephine Strauss, Assistant Attorney General, Olympia, Washington represents Staff. ¹⁵ Tad Robison O'Neill, Jessica Johanson-Kubin, and Robert Sykes, Assistant Attorneys Generals, Seattle, Washington represent Public Counsel.

DISCUSSION

- The Commission approves and adopts the Settlement Agreement, which is not opposed by any party and resolves all outstanding issues in this docket.
- 17 The Settlement Agreement in this docket contains three key elements:
 - PSE is required to refund all electric customers charged under the Schedule 52-B 12th Revision, between January 11, 2023 and March 7, 2024, the difference between the 11th Revision and the 12th Revision of Schedule 52-B, plus interest. The total refund amount to customers is \$41,156.51, plus interest. ¹⁶

¹⁵ In formal proceedings such as this, the Commission's regulatory staff participates like any other party, while the Commissioners make the decision. To assure fairness, the Commissioners, the presiding administrative law judge, and the Commissioners' policy and accounting advisors do not discuss the merits of this proceeding with the regulatory staff, or any other party, without giving notice and opportunity for all parties to participate. See RCW 34.05.455

 $^{^{16}}$ WUTC v. Puget Sound Energy, Docket UE-240087, Multiparty Settlement Stipulation and Agreement 3 \P 9 (Apr. 19, 2024).

- 2) PSE will implement a process or mitigation strategy in all future general rate case compliance filings to ensure an additional review is conducted and all tariff sheets are included in future filings.¹⁷
- PSE agrees to a suspended penalty of \$106,182. The penalty is suspended until PSE's current general rate case concludes. If there are no missing tariff sheets in PSE's compliance filing in the current general rate case, Staff will support eliminating the suspended penalty.
- The Commission will approve a settlement "when doing so is lawful, the settlement terms are supported by an appropriate record, and when the result is consistent with the public interest in light of all the information available to the commission." ¹⁸
- We approve and adopt the Settlement Agreement.
- To begin, RCW 80.28.080(1)(a) prohibits regulated utilities, including electric companies, from charging and collecting rates from customers other than those on file and approved by the Commission. RCW 80.28.050 requires electric companies to file with the Commission all tariff schedules, showing all rates and charges made under those schedules. RCW 80.28.060(1) disallows changes to rates without compliance with RCW 80.28.050 and 30 days' notice to the Commission. Finally, a utility is required to publish its tariffs, but those tariffs must be approved by the Commission before they may be effective, pursuant to WAC 480-100-028 and WAC 480-80-010.
- Here, we find the Settlement Agreement sufficiently addresses any potential violations of law contained in Staff's complaint. The Settlement Agreement, in effect, reverts to PSE's Schedule 52-B 11th Revision, which was properly approved and filed with the Commission prior to resolution of Docket UE-220066 and refunds to customers all charges greater than those contained in Schedule 52-B 11th Revision to customers with interest. Accordingly, we find that the Settlement Agreement is lawful and equitable to customers who may have been charged rates not in compliance with statute and Commission rules.
- The Settlement Agreement is also supported by the record. PSE's witness, Birud Jhaveri, testified that following discovery of the error, PSE refunded customers the amount

¹⁷ *Id.* at $3 \, \P \, 10$.

¹⁸ WAC 480-07-750(2).

contained in the Settlement Agreement, even before the Settlement Agreement was reached. ¹⁹ This was confirmed at the Settlement Hearing. ²⁰

- Further, the Settlement Agreement's condition that PSE implement an additional step in its compliance filing review is supported by the record and is persuasive in showing that PSE is taking steps to show that something similar does not occur again. Specifically, PSE provides testimony that an additional step will occur both before the compliance filing and cross checking tariff sheets after a compliance filing is approved to ensure no tariff sheets are missing.²¹
- 24 Similarly, we find that a suspended penalty is also supported by the record. The Commission may consider several factors in determining whether to suspend a penalty. These include whether (1) the company has been penalized for a similar violation, (2) the company has taken action to remedy the violations and avoid the violation in the future, (3) the company agrees to a specific compliance plan, (4) Staff and the company have agreed Staff will conduct a follow-up investigation, and (5) the company can demonstrate other mitigating factors.²²
- In this matter, PSE has taken action to remedy the violations in an equitable manner, returning funds charged under the 12th Revision with interest. Additionally, PSE has taken steps to ensure the violation does not occur again, and the record supports that the filing error was inadvertent and not recognized by PSE or Staff for approximately a year, at which time PSE recognized the error and notified Staff. For these reasons, we find suspending the penalty is supported by the record.
- Finally, we find that the Settlement Agreement is in the public interest. On this point, we agree with PSE's testimony that customers have been refunded the difference in rates between the 11th and 12th Revision to Sheet 52-B with interest. Additionally, we are hopeful that the steps PSE is taking to improve their review process will prevent such an error from occurring again.

¹⁹ Jhaveri, Exh. BDJ-1T at 8:12-14; 9:7-9.

²⁰ Jhaveri, Tr. 20:3-10.

²¹ Jhaveri, Exh. BDJ-1T, at 7:16-24; see also, Jhaveri, Tr. 21:1-15.

²² Docket A-120061, Enforcement Policy for the Washington Utilities and Transportation Commission ¶ 20 (Jan. 7, 2013) (Enforcement Policy).

FINDINGS AND CONCLUSIONS

- 27 (1) The Commission is an agency of the state of Washington vested by statute with the authority to regulate the rates, rules, regulations, practices, accounts, securities, transfers of property and affiliated interests of public service companies, including electric companies.
- 28 (2) Puget Sound Energy is an electric company and a public service company subject to Commission jurisdiction.
- 29 (3) Puget Sound Energy is subject to RCW 80.28.080(1)(a), which prohibits regulated utilities, including electric companies, from charging and collecting rates from customers other than those on file and approved by the Commission.
- 30 (4) Puget Sound Energy is subject to RCW 80.28.050 requires electric companies to file with the Commission all tariff schedules showing all rates and charges made under those schedules.
- Puget Sound Energy is subject to RCW 80.28.060(1), which disallows changes to rates without compliance with RCW 80.28.050 and 30 days' notice to the Commission.
- Puget Sound Energy is subject to WAC 480-100-028 and 480-80-010, which require utilities to publish its tariffs, but those tariffs must be approved by the Commission before they may be effective.
- On January 9, 2023, Puget Sound Energy filed a compliance filing in Docket UE-220066, and that filing did not include the Schedule 52-B 12th Revision.
- 34 (8) Thereafter, Puget Sound Energy posted Schedule 52-B 12th Revision to its website and began charging customers under the unapproved 12th Revision.
- 35 (9) On January 23, 2024, Puget Sound Energy discovered the error and notified Staff.
- 36 (10) Puget Sound Energy subsequently refunded to customers the difference between the unapproved 12th Revision and the previously approved 11th Revision of Schedule 52-B.
- 37 (11) The conditions proposed in the Settlement Agreement are supported by the record and consistent with the public interest.

The Settlement Agreement is consistent with the public interest and should be approved subject to the conditions set out in the Settlement Agreement.

39 (13) The penalty agreed to in the Settlement Agreement should be suspended until Puget Sound Energy's current General Rate Case concludes and should be eliminated if there are no tariff sheets missing from Puget Sound Energy's compliance filing in that docket.

ORDER

THE COMMISSION ORDERS:

- 40 (1) The Full Multi-Party Settlement Agreement filed by Commission Staff on behalf of Commission Staff and Puget Sound Energy and attached to this Order as Appendix A is approved and adopted.
- The Commission retains jurisdiction over the subject matter and Puget Sound Energy to effectuate the provisions of this Order.

Dated at Lacey, Washington, and effective August 28, 2024

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

/s/ Connor A. Thompson CONNOR THOMPSON Administrative Law Judge

NOTICE TO PARTIES

This is an Initial Order. The action proposed in this Initial Order is not yet effective. If you disagree with this Initial Order and want the Commission to consider your comments, you must take specific action within the time limits outlined below. If you agree with this Initial Order, and you would like the Order to become final before the time limits expire, you may send a letter to the Commission, waiving your right to petition for administrative review.

WAC 480-07-610(7) provides that any party to this proceeding has twenty-one (21) days after the entry of this Initial Order to file a *Petition for Review*. What must be included in any Petition and other requirements for a Petition are stated in WAC 480-07-610(7)(b). WAC 480-07-610(7)(c) states that any party may file a *Response* to a Petition for review within seven (7) days after service of the Petition.

WAC 480-07-830 provides that before entry of a Final Order any party may file a Petition to Reopen a contested proceeding to permit receipt of evidence essential to a decision, but unavailable and not reasonably discoverable at the time of hearing, or for other good and sufficient cause. No Answer to a Petition to Reopen will be accepted for filing absent express notice by the Commission calling for such answer.

RCW 80.01.060(3) provides that an Initial Order will become final without further Commission action if no party seeks administrative review of the Initial Order and if the Commission fails to exercise administrative review on its own motion.

Any Petition or Response must be electronically filed through the Commission's web portal as required by WAC 480-07-140(5). Any Petition or Response filed must also be electronically served on each party of record as required by WAC 480-07-140(1)(b).

APPENDIX A MULTIPARTY SETTLEMENT AGREEMENT

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

DOCKET UE-240087

PUGET SOUND ENERGY,

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Respondent.

MULTIPARTY SETTLEMENT STIPULATION AND AGREEMENT

I. INTRODUCTION

This Settlement Stipulation and Agreement ("Settlement") is entered into by and between the following parties in this case: (i) Puget Sound Energy ("PSE" or "Company"), and (ii) the regulatory staff of the Washington Utilities and Transportation Commission ("Commission Staff"), 1 as of April 19, 2024 (the "Settlement Date"). These parties are hereinafter collectively referred to as "Settling Parties" and individually as "Settling Party."

The Public Counsel Unit of the Attorney General's Office has engaged in settlement discussions but takes no position in the Settlement.

Because this Settlement is entered into by some, but not all of the parties, and it resolves all issues in the case, it is a "multiparty settlement," as that term is defined in WAC 480-07-730(3).

MULTIPARTY SETTLEMENT STIPULATION AND AGREEMENT – 1 166430978.1

¹ In formal proceedings, such as this, the Commission's regulatory staff participates like any other party, while the Commissioners make the decision. To assure fairness, the Commissioners, the presiding administrative law judge, and the Commissioners' policy and accounting advisors do not discuss the merits of this proceeding with the regulatory staff, or any other party, without giving notice and opportunity for all parties to participate. *See* RCW 34.05.455.

This Settlement is subject to review and disposition by the Washington Utilities and Transportation Commission ("Commission"). The Settlement is effective on the date executed except that Section III of the Settlement is effective on the date of the Commission order approving it (unless the Commission establishes a different date).

II. BACKGROUND AND NATURE OF THE DOCKET

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PSE filed a general rate case on January 31, 2022, in Dockets UE-220066/UG-220067. PSE's initial filing included proposed electric tariff revisions to two sheets in Schedule 52: Sheet 52-A (27th Revision) and Sheet 52-B (12th Revision). The case parties reached a multiparty settlement that included agreement over the proposed revisions to electric Schedule 52. On December 22, 2022, the Commission issued Order 24/10 approving of the settlement, with conditions; the approved settlement included revisions to electric Schedule 52, as proposed in PSE's initial filing.

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On December 27, 2022, PSE submitted a compliance filing in Docket UE-220066 following issuance of Order 24/10. This filing contained the electric tariff sheets for Schedule 52, amongst other electric schedules. The filing was rejected, in part, in Order 26/12, for reasons unrelated to Schedule 52. PSE refiled the compliance filing on January 9, 2023, to correct the items identified in Order 26/12. This second compliance filing did not contain a Schedule 52, Sheet 52-B 12th Revision tariff sheet due to an inadvertent clerical filing error by PSE. The Commission approved the January 9, 2023 tariff filing, and electric rates became effective on January 11, 2023. PSE began charging the Sheet 52-B, 12th Revision rate to electric customers on January 11, 2023.

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On January 24, 2024, PSE reached out to discuss with Commission Staff that the electric Schedule 52, Sheet-B 12th Revision tariff sheet was unintentionally left out of the

January 9, 2023 filing, but customers were still charged the rate. PSE had published the Schedule 52, Sheet 52-B 12th Revision tariff sheet on its website. PSE inquired how to resolve the issue. Responding to an informal request from Commission Staff, PSE noted that as of February 2024, 2,372 customers had been charged the 12th Revision rate each month since January 11, 2023. There is only one rate on Sheet 52-B.

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On March 5, 2024, the Commission issued a Complaint and Notice of Prehearing Conference in Docket UE-240087 ("Complaint"). In the Complaint, Staff alleges that PSE violated RCW 80.28.080(1)(a) 26,982 times, RCW 80.28.050 392 times, WAC 480-100-028 392 times, and RCW 80.28.060(1) one time.

III. AGREEMENT

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The Settling Parties agree to the below terms as the basis for settling Commission
Staff's allegations against PSE. Staff and the Company agree that these terms are consistent
with the public interest and should be approved without condition by the Commission.

A. Refunds to electric customers with interest.

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PSE will issue refunds to all electric customers subject to the electric rate of Schedule 52, Sheet-B, between January 11, 2023 and March 7, 2024. The total refund that PSE will issue amounts to \$41,156.51, plus interest. Interest will be calculated in accordance with PSE's Interest Credit Policy, which is attached to this Settlement as Exhibit A.

B. Compliance filing process.

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PSE will implement a mitigation strategy on all future general rate case ("GRC") compliance filings. This strategy will consist of adding additional review steps before the compliance filing is filed and after the compliance filing is approved. Before the compliance filing is filed, PSE will conduct an additional review to ensure all sheets are included. After

the compliance filing is approved, PSE will request from the Commission's Records Center a copy of the approved compliance filing tariff sheets. After receiving the approved copy, PSE will use the approved version obtained from the Records Center on its website.

C. Suspended penalty.

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PSE agrees to a suspended penalty of \$106,182. This penalty will be suspended until after the Commission approves the compliance filing for the tariff sheets in the current PSE GRC (Dockets UE-240004 and UG-240005). If there are no missing tariff sheets in PSE's approved initial compliance filing after a final order is issued, and all the tariff sheets on PSE's website are those approved in the compliance filing for Dockets UE-240004 and UG-240005, Staff will support eliminating the suspended penalty.

D. Compliance filing.

While not a condition of settlement, PSE has also indicated it will file a supplemental compliance filing in Docket UE-220066 to add in the missing 12th Revision of Sheet 52-B and revert the rate to the 12th Revision rate approved by the Commission in Docket UE-220066. Commission Staff reserves the right to respond or object to the filing if it is not what the Commission approved in Docket UE-220066.

If PSE's supplemental compliance filing to add in the missing tariff sheet described above is approved, PSE will also make a substitute tariff filing in the 2024 GRC to replace the 12th Revision of Schedule 52, Sheet 52-B, in the 2024 GRC, with the 13th Revision.

IV. GENERAL PROVISIONS

Entire Agreement. This Settlement is the product of negotiations and compromise amongst the Settling Parties and constitutes the entire agreement of the Settling Parties.

Accordingly, the Settling Parties recommend that the Commission adopt and approve the

MULTIPARTY SETTLEMENT STIPULATION AND AGREEMENT – 4 166430978.1

Settlement in its entirety as a full resolution of contested issues in this docket. This

Settlement will not be construed against any Settling Party on the basis that it was the drafter
of any or all portions of this Settlement. This Settlement supersedes any and all prior oral
and written understandings and agreements on such matters that previously existed or
occurred in this proceeding, and no such prior understanding or agreement or related
representations will be relied upon by the Settling Parties to interpret this Settlement or for
any other reason.

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Confidentiality of Negotiations. The Settling Parties agree that this Settlement represents a compromise in the Settling Parties' positions. As such, conduct, statements, and documents disclosed during the negotiation of this Settlement are not admissible in this or any other proceeding and will remain confidential. Notwithstanding the foregoing, the Settlement itself and its terms do not fall within the scope of this confidentiality provision, and each Settling Party is free to publicly disclose the basis for its own support of the Settlement.

16

<u>Precedential Effect of Settlement</u>. The Settling Parties enter into this Settlement to avoid further expense, uncertainty, inconvenience, and delay. The Settling Parties agree that this Settlement Agreement does not serve to bind the Commission when it considers any other matter not specifically resolved by this Settlement in future proceedings. Nothing in this Settlement compels any Settling Party to affirmatively intervene or participate in a future proceeding.

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<u>Positions Not Conceded</u>. In reaching this Settlement, the Settling Parties agree that no Settling Party concedes any particular argument advanced by that Settling Party or accedes to any particular argument made by any other Settling Party. Nothing in this

Settlement (or any testimony, presentation or briefing supporting this Settlement) shall be asserted or deemed to mean that a Settling Party agreed with or adopted another Settling Party's legal or factual assertions in this proceeding. The limitations in this paragraph 17 will not apply to any proceeding to enforce the terms of this Settlement or any Commission order adopting this Settlement in full.

18

Manner of Execution. This Settlement is executed when all Settling Parties sign the Settlement. A designated and authorized representative may sign the Settlement on a Settling Party's behalf. The Settling Parties may execute this Settlement in counterparts. If the Settlement is executed in counterparts, all counterparts shall constitute one agreement. A Settlement signed in counterpart and sent by facsimile or emailed as a pdf is as effective as an original document. A faxed or emailed signature page containing the signature of a Settling Party is acceptable as an original signature page signed by that Settling Party. Each Settling Party shall indicate the date of its signature on the signature page. The date of execution of the Settlement will be the latest date indicated on the signature page(s).

19

Approval Process and Support of Settlement. Each Settling Party agrees to support in this proceeding the terms and conditions of this Settlement as a full and final resolution of all contested issues between them in the above-captioned docket. Each Settling Party agrees to support the Settlement during the course of whatever proceedings and procedures the Commission determines are appropriate for approval of the Settlement.

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Commission Approval with Conditions. In the event the Commission approves this Settlement, but with conditions not proposed in this Settlement, the provisions of WAC 480-07-750(2)(b) will apply. If a Settling Party rejects a condition, this Settlement is deemed rejected and void and the Settling Parties will jointly and promptly request the Commission

convene a prehearing conference to address procedural matters, including a procedural

schedule for resolution of the case at the earliest possible date.

Commission Rejection. In the event the Commission rejects this Settlement, the

provisions of WAC 480-07-750(2)(c) will apply. In that event, the Settling Parties agree to

jointly and promptly request the Commission convene a prehearing conference to address

procedural matters, including a procedural schedule for resolution of the case at the earliest

possible date.

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DATED this 19th day of April 2024.

Respectfully submitted,

ROBERT W. FERGUSON

Attorney General

Josephine Strauss

Assistant Attorney General Counsel for Washington Utilities and Transportation Commission Staff **PUGET SOUND ENERGY**

Birud Jhaveri

Director, Regulatory Affairs

DATED this 19th day of April 2024.

Respectfully submitted,

ROBERT W. FERGUSON Attorney General

Josephine Strauss
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff

PUGET SOUND ENERGY

— DocuSigned by:

Birnd D. Jhaveri

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Birud Jhaveri Director, Regulatory Affairs

EXHIBIT A

Interest Credit Policy*

When an account has been rebilled and a credit has been given, it is necessary to add a Post Adjustment credit to the customer's account for interest based on the incorrectly billed amount. Review the scenarios below for additional information. See RCW 80.04.230 and RCW 80.28.090 for the laws pertaining to this policy. The interest credit is calculated based on the correction amount, including any newly released bills, using the Customer Data Tab to determine credit amount is recommended.

Scenarios:

- 1. Under the same Contract Account, one Installation has corrected charges resulting in a credit and another Installation has corrected charges resulting in a debit:
 - For the Installation that was over-charged and results in a credit, add an Interest Credit Post-Adjustment according to the table below
- 2. Under the same Contract Account, both Installations have corrected charges resulting in a credit:
 - Add only one Interest Credit Post-Adjustment based on the TOTAL credit amount according to the table below

Standard Interest Table

Standard Interest Table	
Amount of credit	Interest Refund
Up to \$1,000	\$5.00
\$1001 & Above	\$25.00