



Puget Sound Energy  
P.O. Box 97034  
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PSE.com

November 20, 2020

***Filed Via Web Portal***

Mr. Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503

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Records Management  
11/20/20 08:59  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**Re: Docket UE-200027 – Do Not Redocket  
Monthly Report -- Compliance with Settlement Requirements**

Dear Mr. Johnson:

This report is filed pursuant to paragraph 30 of the Initial Order in the above-referenced docket, which states as follow:

Puget Sound Energy, Commission Staff, and the Public Counsel Unit of the Attorney General’s Office must jointly file reports every 30 days after the date on which this Order becomes final on the status of Puget Sound Energy’s compliance with the settlement requirements to refund or credit the erroneous or unauthorized charges until the parties agree, and the Commission confirms, that the Company has fully complied with those requirements.

Puget Sound Energy (“PSE”) has conferred with Commission Staff and Public Counsel (the “Parties”) in preparing this report, and PSE has been authorized by those parties to file this report on behalf of all parties.

As discussed in more detail below, all Parties agree that all amounts that were required to be refunded to customers have now been refunded. The Parties request the Commission confirm that PSE has fully complied with the requirements set forth in the Settlement Agreement and the Initial Order.

**Reconnection Fee**

In its Investigation Report published on April 2, 2020 (“Investigation Report”), Commission Staff found that PSE charged a reconnection fee to 15 customers who had their service

improperly disconnected and recommended that PSE be required to calculate reconnection fees described by its Commission-approved tariff and apply a credit or provide a refund to the customers' accounts as appropriate. PSE reviewed the credits issued to customers in a call with all Parties on October 26, 2020 to confirm agreement with the credit amounts. After review, all Parties agreed that all customer accounts had been credited accurately.

#### Late Fees

In its Investigation Report, Commission Staff found that PSE charged late pay fees on 18 occasions from May 18, 2018, through March 15, 2019, to customers who made timely payments, but PSE improperly applied the payments to a wrong account. Commission Staff recommended in its Investigation Report that PSE be required to calculate the late fees as described by its Commission-approved tariff and apply a credit or provide a refund to the customers' accounts as appropriate. PSE reviewed the credits issued to customers in a call with all Parties on October 26, 2020 to confirm agreement with the credit amounts. After review, all Parties agreed that all customer accounts had been credited accurately.

#### Security Deposits

In its Investigation Report, Commission Staff found that PSE improperly collected security deposits from 12 separate customers when the Company did not apply their payment to the proper account. Commission Staff recommended that PSE remit to affected customers a total refund of \$3,418.13 for charging security deposits in violation of WAC 480-100-113. Additionally, Staff recommended that PSE calculate and credit each of the 12 customers the accrued interest on their deposit. PSE returned each deposit with interest identified by Commission Staff, but found that the total amount differed slightly from the amount listed in the Investigation Report and that the total refund applied for security deposits was \$3,300. PSE has reviewed the original amount of \$3,418.13, identified by Staff and has confirmed that the amount included some outstanding reconnect charges as well as the amounts of the security deposits. PSE reviewed the credits issued to customers in a call with all Parties on October 26, 2020 to confirm agreement with the credit amounts. After review, all Parties agreed with the \$3,300 refund amount for security deposits and further agreed that all customer accounts had been credited accurately.

#### Treble Damages for Improper Diversion of Energy

In its Investigation Report, Commission Staff recommended that PSE be required to remit to 286 affected customers a total refund of \$170,488.05 collected from customers as treble damages for the customers' unlawful diversion of energy, because the treble damages PSE collected were not awarded in successfully litigated lawsuits per RCW 80.28.080 and RCW 80.28.240. These amounts were billed and collected between February 13, 2018 and September 1, 2019. PSE reviewed the credits issued to customers in a call with all Parties on October 26, 2020, and found the total amount differed slightly from the amount listed in the Investigation Report and the total refund applied for treble damages was \$177,686.01. After review, all Parties confirmed agreement with the credit amounts and further agreed that all customer accounts had been credited accurately.

In light of the above, the Parties respectfully request that the Commission confirm that PSE has fully complied with the requirements in the Initial Order and Settlement Agreement, pursuant to paragraph 30 of the Initial Order.

Please contact Veronica Martin at (425) 457-5624 for additional information about this report. If you have any other questions please contact me at (425) 456-2142.

Sincerely,

*/s/ Jon Piliaris*

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