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Preliminary Comments of the Energy Project Regarding  
Dockets No. UE-990473 and UG-990294

The Energy Project appreciates the opportunity to participate in the Commission's rule making proceedings reviewing Chapters 480-90 and 480-100 of the WAC regarding electric and gas companies. These issues are vitally important to the health and well being of thousands of households living in poverty in Washington. Given the frequent occurrence of unintended consequences as a result of such rule making, we are concerned that what may on the surface appear to be logical and reasonable changes will inadvertently and adversely affect these low-income households.

A number of suggestions already discussed in these proceedings would, in fact, make accessing and maintaining gas or electric utility service more difficult for the low-income population. It will be in the best interest of the utilities and their rate payers, as well as for low-income customers themselves, to establish mechanisms which make it easier for households living in poverty to access and afford utility service. Absent such mechanisms, we can easily see many customers being denied or disconnected from these vital services. We would be happy to work with utilities, the Commission, and other stakeholders to investigate how such mechanisms could be created. While we intend to submit more detailed comments as the proceeding continues, at this time we would like to support the comments recently forwarded to the Commission by the Office of the Public Counsel.

Respectfully submitted,

Chuck Eberdt  
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