

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-190529 and  
UG-190530

RESPONSE TO BENCH REQUEST  
NO. 15 ON BEHALF OF THE  
ENERGY PROJECT

1           The Energy Project (TEP) respectfully submits the following response to Bench Request  
No. 15, served on April 22, 2020, regarding “options to mitigate the impact in the short-term of  
any rate increase on customers that result from final resolution of this case.”

2           The Energy Project believes that the record supports a final order that would deny any  
rate increase to Puget Sound Energy (PSE) in this case, which would of course, obviate the need  
for any mitigation measures. Cognizant of the guidance in the Bench Request, however, TEP  
will not re-litigate any of the contested issues.

3           Should the Commission determine that a rate increase of any kind is warranted, TEP  
recommends that the Commission consider delaying the effective date of any rate increase at  
least six months beyond the suspension date so that no rate increase would occur in the calendar  
year 2020. A twelve-month delay, or other type of rate “phase-in” would be preferable in order  
to avoid a rate increase taking effective during the winter heating season. The Energy Project  
appreciates PSE’s initial voluntary extension of the effective date, but circumstances are such  
that a longer period should be considered.

4           The reasons for delay are apparent, and are indeed implicit in the Commission’s issuance  
of the Bench Request. Governor Inslee has recently announced that the state’s economy will  
only slowly reopen in a phased process, with no specific timeline, and much dependent on the

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availability of public health resources.<sup>1</sup> A George Mason University report projected that COVID-19 will take a dramatic toll on Washington’s economy at least through the first quarter of 2021.<sup>2</sup> It is reported that 20 percent of Washington workers have filed unemployment claims since March.<sup>3</sup> Food insecurity is surging, with reportedly over 1.6 million in Washington facing shortages,<sup>4</sup> and with food banks being overwhelmed.<sup>5</sup> Given these extraordinarily challenging circumstances, imposing higher utility costs on low-income customers, and indeed all residential customers should be avoided in any way possible within the Commission’s authority.

Maintaining universal service of utilities is an essential part of enabling Washington’s citizens to adequately respond to the Governor’s “stay at home” directives, to adhere to public health guidelines, and to continue to participate in the economy to the extent possible.

5           Once the Commission has reviewed the initial responses it receives today, if it wishes to consider this option further, the procedural schedule in this case allows sufficient time for the Commission to notify parties and to take comments from all parties on any legal, policy, financial, or operational issues that implementing a delay would raise. To that end, it might make sense to extend the May 8 response date for a short period.

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<sup>1</sup> <https://www.seattletimes.com/seattle-news/politics/inslee-says-washingtons-economy-will-likely-reopen-in-phases-not-all-at-once-amid-coronavirus-crisis/>

<sup>2</sup> <https://www.washingtonian.com/2020/03/18/covid-19-will-take-a-dramatic-toll-on-washingtons-economy/>

<sup>3</sup> <https://q13fox.com/2020/04/30/1-in-5-washington-workers-have-filed-unemployment-claims/>

<sup>4</sup> <https://komonews.com/news/coronavirus/more-than-16-million-people-in-washington-are-struggling-with-food>

<sup>5</sup> <https://www.kiro7.com/news/local/millions-dollars-still-needed-help-struggling-food-banks/OWHNCNNWL5H3VNAOHOMJFTUXRM/>

6           The Energy Project thanks the Commission for providing parties the opportunity to  
address this important issue through the Bench Request.

7           RESPECTFULLY SUBMITTED,

8           Dated this 1st day of May, 2020.

Simon J. ffitch  
Attorney at Law

*/s/ Simon J. ffitch*, WSBA No. 25977  
For The Energy Project