



**Bob Ferguson**  
**ATTORNEY GENERAL OF WASHINGTON**

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November 5, 2021

**VIA UTC WEB PORTAL**

Amanda Maxwell  
 Executive Director and Secretary  
 Washington Utilities and Transportation Commission  
 621 Woodland Square Loop S.E.  
 Lacey, WA 98503

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Re: *Revises Tariff WN U-60, Electric Schedule 129, Low Income Program to implement a supplemental Crisis Affected Customer Assistance Program to assist low-income customers with arrearages,*  
 Dockets UE-210792 and UG-210793

Dear Director Maxwell:

On October 15, 2021, Puget Sound Energy (“PSE” or “Company”) filed a petition to amend the schedules associated with their COVID-19 Residential Bill Assistance program, known as Crisis Affected Customer Assistance Program (CACAP), for electric and natural gas service. The Company consulted with the Low-Income Advisory Committee on the proposed program changes. The Public Counsel Unit of the Washington State Attorney General’s Office (“Public Counsel”) appreciates the opportunity comment on this filing.

***Public Counsel’s Recommendation***

Public Counsel recommends the Washington Utilities and Transportation Commission (“Commission”) approve PSE’s proposed revisions to emergency bill assistance programs in response to ongoing need and persistent customer arrearages. Additionally, the Commission should urge the Company to focus outreach efforts on customers with long-term arrearages.

**I. EXPANDED CRISIS BILL ASSISTANCE**

The Company seeks to expand customer eligibility for CACAP funds through amended income criteria and auto-enrollment. The proposal expands income eligibility to include households earning up to 200 percent of the federal poverty level, as opposed to the existing 150 percent. This increases the share of eligible customers. According to the filing and discussions with the advisory group, PSE used internal and third-party credit data to determine customers that likely meet income criteria but have not applied for CACAP funds or previously enrolled in a bill assistance program in the past two years. This will assist the Company in disbursing funds to customers in need as significant arrearages persist.

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To: Amanda Maxwell, Executive Director and Secretary  
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The Company's proposal also does not require additional ratepayer funds as program eligibility and enrollment expands. Rather, the Company intends to use unspent Home Energy Lifeline Program (HELP) funds. Given current arrearages and expected enrollment in the expanded program, if approved, the Company does not anticipate that budgets for the current HELP program year will be impacted.

Despite significant efforts, long-term customer arrearages remain significant. Analysis of September 2021, data reveals that arrearages with a vintage of 90 or more days accounted for 77 percent of all arrearages.<sup>1</sup> Furthermore, arrearages of 90 or more days grew 47 percent between March and September 2021.<sup>2</sup> This was despite overall arrearages decreasing during the same period.<sup>3</sup> It will be incumbent upon the Company to redouble efforts to ensure that customers with long-term arrearages receive the assistance necessary to remain connected. The importance of this is heightened as the winter heating season approaches and the disconnection moratorium has ended.

Public Counsel appreciates the Company's willingness to work with stakeholders and continued efforts to support customers during the ongoing economic crisis. Please direct questions to Corey Dahl, at (206) 464-6380 or [Corey.Dahl@ATG.WA.GOV](mailto:Corey.Dahl@ATG.WA.GOV), or Shay Bauman, at (206) 389-3040 or [Shay.Bauman@ATG.WA.GOV](mailto:Shay.Bauman@ATG.WA.GOV).

Sincerely,

/s/ *Ann Paisner*  
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<sup>1</sup> "200281-PSE-Attach-A-10-28-21.xlsx", *In re: Response to the COVID-19 Pandemic*, Docket U-200281 (Oct. 28, 2021) (Third Quarter Data Report for September 2021 Required by Order 01 and Order 03).

<sup>2</sup> "200281-PSE-Attachment-A-4-30-21.xlsx", *In re: Response to the COVID-19 Pandemic*, Docket U-200281 (Apr. 30, 2021) (Response to Commission Request for COVID-19 related data); "200281-PSE-Attachment-A-4-30-21.xlsx", *In re: Response to the COVID-19 Pandemic*, Docket U-200281 (Oct. 28, 2021).

<sup>3</sup> *Id.*