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March 16, 2021

SENT VIA WEB PORTAL

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

Re: *Washington Utilities & Transportation Commission v. Puget Sound Energy*,
Docket UE-200980

Dear Mr. Johnson:

Enclosed for filing in the above-referenced docket is Public Counsel's Response to Puget Sound Energy's Petition for Exemption and the Certificate of Service.

Sincerely,

/s/ *Lisa W. Gafken*

LISA W. GAFKEN, WSBA No. 31549
Assistant Attorney General
Public Counsel Unit
(206) 464-6595

LWG/CM

Enclosures

cc: Service List (via E-mail)
ALJ Michael Howard (via E-mail)

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKET UE-200980

PUBLIC COUNSEL’S RESPONSE TO
PETITION OF PUGET SOUND
ENERGY FOR EXEMPTION FROM
WAC 480-100-197 AND ORDER 03

1 Pursuant to WAC 480-07-370(4), the Public Counsel Unit of the Washington Attorney General’s Office (“Public Counsel”) responds to Puget Sound Energy’s (PSE) petition for exemption from WAC 480-100-197 and Order 03 (“Petition”). Public Counsel does not oppose PSE’s petition, but requests that the Washington Utilities and Transportation Commission (“Commission”) require PSE to include clarified information on its website to assist in disseminating information about the upcoming virtual public comment hearing.

2 The Commission applies the public interest standard in determining whether to grant an exemption from a Commission rule. WAC 480-07-110(2)(c). In this case, PSE requests the ability to provide customer notices within 20 days, instead of 30 days, of the scheduled April 20, 2021, virtual public comment hearing.¹ PSE cites Force Majeure resulting from the recent severe winter storm in Texas.² The storm delayed a truck carrying PSE's notices from Washington to Texas, where PSE's vendor tasked with mailing the notices is located. PSE estimates that notices to 321,000 customers have been delayed as a result.³ PSE states that it will send an electronic

¹ Petition, ¶ 4.

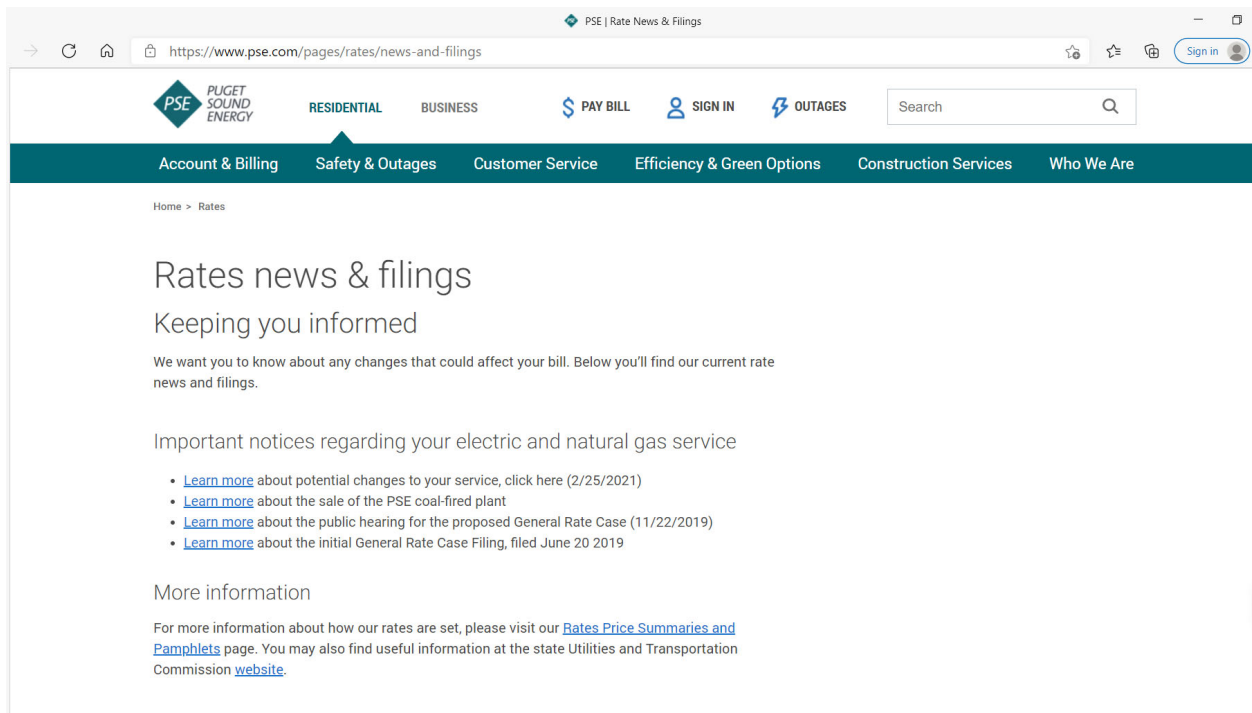
² Petition, ¶ 2.

³ Petition, ¶ 4.

communication to all impacted customers who have provided an email address to the utility.⁴

3 Public Counsel does not oppose the request for waiver. Under the circumstances, PSE's request is reasonable, particularly in light of efforts to mitigate the impact on affected customers. To provide greater mitigation, Public Counsel recommends that PSE improve the information on its website. PSE does provide a link to the customer notice including information about the virtual public comment hearing, but the link is obscurely described.

4 Below is a screen shot taken of PSE's website.⁵ The link to the customer notice is under the first "Learn more" link. The description reads "Learn more about potential changes to your service, click here (2/25/2021)."



⁴ Petition, ¶ 6.

⁵ Rates News & Filings: Keeping You Informed, PUGET SOUND ENERGY, <https://www.pse.com/pages/rates/news-and-filings> (last visited Mar. 15, 2021).

The language on PSE's website should be modified to help customers understand that a public comment hearing in which they may be interested has been scheduled. Public Counsel recommends that the description read, "Learn more about the public hearing for the proposed electric rate increase resulting from increased power costs." This simple modification may provide substantial benefit to impacted customers who do not communicate with PSE via email.

Dated this 16th day of March, 2021.

ROBERT W. FERGUSON
Attorney General

s/ Lisa W. Gafken

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CERTIFICATE OF SERVICE

DOCKET UE-200980

Wash. Utils. & Transp. Comm'n v. Puget Sound Energy
Puget Sound Energy 2020 Power Cost Only Rate Case

I HEREBY CERTIFY that I have this day served *Response to Puget Sound Energy Petition for Exemption on behalf of Public Counsel* upon all parties of record in this proceeding, by electronic transmission to the email address(es) or by mailing a true and correct copy, postage prepaid, to each party or party representative listed in the Commission's master service list for this docket.

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Dated at Seattle, Washington this 16th day of March, 2020.

/s/ 
CHANDA MAK
Legal Assistant