

Graciela Etchart
08/10/99
Re: Reminder

UE-990473
01:59:27 PM



Dennis Moss

08/10/99 10:49 AM

To: Graciela Etchart/WUTC@WUTC
cc: Marjorie Schaer/WUTC@WUTC, Terry Stapleton/WUTC@WUTC, Jim Russell/WUTC@WUTC, Bob Cedarbaum/WUTC@WUTC
Subject: Re: Reminder

It appears that only one rule in which ALS is "lead" requires any attention per stakeholder and Staff comments. This is the Glossary, WAC 480-90/100-021. My thoughts for the first draft (CR101 issuance), are as follows:

Avista suggests definitions for "Proper Charges" and "Prior Obligation", as used in WAC 480-100-071 and -116, respectively. Avista proposes specific language, as follows:

Edit to rules: WAC 480-100-021; add

Prior Obligation - Charges due from a previous customer at an address where a new or different customer is moving in.

Proper Charges - Charges billed to a customer for use of a metered utility service.

I do not think these terms need to be in the glossary. If those terms need defining, it should be done in the rule provisions where they appear.

Northern Natural Gas suggests definitions for "Applicant", "Facilities", and refinements to "Customer." Specifically, NNG says:

WAC 480-90-021 Glossary.

The company proposes to add two definitions; Applicant and Facilities. Both terms are fairly heavily used within this chapter, but neither have been clearly defined. Also, we propose to make minor editorial changes to the definition of customer, and to add a statement that the term customer would include any co-customer named and jointly responsible under the service account.

If "Applicant" is used regularly through the rules as NNG suggests, and has a consistent meaning, a definition might well be included in the Glossary. I, however, do not have specific language to recommend.

"Facilities" strikes me as a term that ought not be defined; if it is defined, the definition would have to be broad and non-exclusive. To the extent the word means specific facilities in a particular connection, it will need to be defined in the individual rule where it has that special meaning. Given these considerations, I do not understand what end would be served by including a definition in the glossary.

As to the proposed refinement of the definition of "Customer", there may be legal implications if the intent is to broaden the sweep of the term to include individuals not now included within the term. I am less concerned if the situation currently *requires* that multiple adult members of a single household all *must* be jointly responsible under the household's service account. I am more concerned if the service account at a given address typically is, or can be, in the name of a single adult member of the household. I am particularly concerned in situations where the individuals are not related to one another. We do not want to be creating or implying joint

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liability where it does not exist today without giving the matter careful consideration.