

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**DOCKETS UE-180899 and UG-180900
(Consolidated)**

TESTIMONY OF

SHAWN M. COLLINS (EXH. SMC-1T)

**DIRECTOR OF
THE ENERGY PROJECT**

In Support of Settlement Stipulation

January 30, 2019

I. INTRODUCTION

Q: Please state your name and business address.

A: I am Shawn Collins. My business address is 3406 Redwood Avenue, Bellingham, WA 98225.

Q: By whom are you employed and in what capacity?

A: I am the Director of The Energy Project (TEP), a program of the Washington State Community Action Partnership housed at the Opportunity Council in Bellingham, WA.

Q: How long have you been employed by the Opportunity Council?

A: I have been employed by Opportunity Council since 2006.

Q: Would you please state your educational and professional background?

A: I have a BA from Eastern Illinois University and have been working on issues impacting low-income populations since 2002 through Community Action Partnership organizations and a variety of other nongovernmental entities. I have been the Director of TEP since August of 2015. Additionally, I am an adjunct faculty member for the Institute for Energy Studies, an interdisciplinary program at Western Washington University. I have previously provided testimony on behalf of TEP before this Commission, including in Dockets UE-150204/UG-150205 (Avista 2015 General Rate Case), Docket UE-152253 (Pacific Power 2015 General Rate Case), Docket UG-152286 (Cascade Natural Gas 2015 General Rate Case), Docket UE-161123 (PSE Microsoft Special Contract), Dockets UE-170033/UG-170034 (PSE 2017 General Rate Case), Dockets UE-

1 170485/UG-170486 (Avista 2017 General Rate Case), Docket UG-170929
2 (Cascade 2017 Natural Gas General Rate Case), Docket U-170970 (Avista/Hydro
3 One Merger), and Docket U-180680 (PSE Macquarie Sale).

4 Prior to my involvement with TEP, I was the Associate Director of a
5 division at Opportunity Council responsible for the implementation of a number
6 of weatherization programs benefitting low and moderate-income households
7 throughout northwest Washington State. Through my involvement with the
8 energy efficiency/regulatory sector, I have attended and presented at numerous
9 national conferences, participated in sector specific workshops and trainings, and
10 was a board member for Home Performance Washington from 2013-2015. A full
11 statement of my qualifications is contained in my Exh. SMC-2.

12 **Q: On whose behalf are you testifying?**

13 A: I am testifying for TEP, an intervenor in this proceeding, on behalf of the
14 Community Action Partnership (CAP) organizations that provide low-income
15 energy efficiency and bill payment assistance for customers in Puget Sound
16 Energy's service territory. These agencies include: Centerstone; Community
17 Action Council of Lewis, Mason, Thurston; Community Action of Skagit County;
18 Hopelink; Hopesource; Metropolitan Development Council; Multi-Service
19 Center; Kitsap Community Resources; Opportunity Council; Pierce County
20 Community Action, and Snohomish County Community Action.

1 **II. PURPOSE OF TESTIMONY**

2 **Q: Could you please summarize the purpose of your testimony?**

3 A: The purpose of my testimony is to provide support for approval of the full
4 settlement described in the Settlement Stipulation and Agreement (Settlement) in
5 this docket. My testimony focuses on the elements of the Settlement that impact
6 low-income populations within PSE's service territory and explains why TEP
7 believes the Settlement is in the public interest.

8 **III. DISCUSSION OF LOW-INCOME ISSUES**

9 **Q: Can you provide an overview of the key elements of the Settlement that are**
10 **beneficial from a low-income customer perspective?**

11 A: The Settlement includes several components which benefit low-income
12 customers. These include agreements to:

- 13 • Increase natural gas low-income Home Energy Lifeline Program (HELP)
14 funding.
- 15 • Defer AMI cost recovery and prudence determinations.
- 16 • Refrain from remote disconnection of customers for non-payment until the
17 current AMI rulemaking docket is concluded.
- 18 • Implement no rate increase for electric customers.

1 **Q: Please describe the increase to HELP funding provided for in the Settlement.**

2 A: Paragraph 8 of the Settlement provides that the annual level of natural gas low-
3 income Home Energy Lifeline Program (HELP) funding will be increased by an
4 amount equal to the corresponding overall percent rate increase for the residential
5 natural gas customer class, i.e., 2.66 percent. This represents an increase in
6 annual natural gas HELP funding of approximately \$130,000. If approved, the
7 increase would be effective with the next low-income filing under Schedule 129
8 for rates on October 1, 2019. This will allow HELP funding to keep pace with the
9 level of natural gas residential rates, and help to mitigate the impact of the natural
10 gas rate increase on low-income customers.

11 **Q: Please describe other aspects of the Settlement that benefit low-income**
12 **customers.**

13 A: PSE's agreement to a moratorium on remote disconnection is beneficial to low-
14 income customers, who are at greater risk of disconnection for non-payment.
15 This restriction will ensure that a customer who faces disconnection will have a
16 "premise visit" by a PSE employee dispatched to disconnect service if no
17 payment has been received in response to prior notices. This provides the
18 customer with a final opportunity to prevent disconnection by making a payment
19 to the on-site PSE employee. Data provided by PSE and other companies in the
20 rulemaking and in prior dockets shows that a high proportion of premise visits
21 result in payments that prevent disconnection. This provision in the settlement
22 preserves this opportunity for all PSE customers until the Commission can

1 address the premise visit requirement in the AMI consumer protection rulemaking
2 docket, U-180525. If AMI rules are not established by January 1, 2020, PSE
3 agrees to notify the parties before implementing remote disconnection procedures.

4 **Q: Are there other aspects of the Settlement Agreement that you wish to**
5 **address?**

6 A: Yes. The fact that customers will not see an electric rate increase as a result of
7 this filing is a tangible benefit of the settlement, particularly for low-income
8 customers. In addition, TEP supports the deferred recovery of AMI costs and the
9 fact that there is no determination of prudence for any portion of AMI in this
10 ERF. TEP has a number of concerns about the cost and prudence of AMI, and its
11 impact on low-income customers. The format of the ERF proceeding does not
12 lend itself to in-depth review of those issues. Deferral of AMI cost-recovery and
13 prudence issues until a more appropriate future proceeding, such as a GRC, is a
14 preferable approach.

15 **V. CONCLUSION**

16 **Q: Does The Energy Project support approval of the Settlement?**

17 A: Yes. The Energy Project believes that the Settlement is in the public interest and
18 recommends that it be approved by the Commission.

19 **Q: Does this conclude your testimony?**

20 A: Yes.