

**BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION
COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET NO. UE-090704

and

DOCKET NO. UG-090705
(consolidated)

THE ENERGY PROJECT'S
COMMENTS IN SUPPORT OF
PUBLIC COUNSEL'S OBJECTION
TO PSE'S CUSTOMER NOTICE

I. INTRODUCTION

1. The Energy Project is taking this opportunity to file the following comments in support of Public Counsel's Objection to Puget Sound Energy's (PSE) proposed customer notice for Docket Nos. UE-090704 and UG-090705. While the Energy Project did not participate in the discussions that Public Counsel documents in their objection regarding this notice, we believe there is much merit in several of their comments. Our observation over the last seventeen years of various interactions at the WUTC is that it is generally difficult to get the public to turn out to public hearings or to express their concerns. For this reason we believe the changes to which Public Counsel is objecting represent a step backward in furthering the flow of communication from the public to the Commission.

II. DISCUSSION

2. There are many reasons a member of the general public might find it difficult to voice his or her concerns about a rate case. For some, perhaps many, the quasi-judicial

nature of rate cases is sufficient to discourage participation. A rate case delves into many matters that require an expert to understand. It is unfamiliar territory and would require too much time to learn to navigate. Certainly, many of the low-income households the Energy Project is concerned with do not have the wherewithal to travel to a public meeting even if they do feel equipped to stand up and make comment. Nor do most have ready access to computers to communicate their thoughts. Yet, the accumulated results of these cases impact them significantly. It is for exactly these reasons we believe that every means to facilitate such communication should be employed.

3. Public Counsel's objection enumerates several departures from the evolved format that four of the five IOU's have used. Two of these departures center on the information regarding how bill impact information is communicated. We believe it is very important that this communication in particular be as clear and precise as possible. The proposed notice, for example states in one chart that the residential "Average rate per kWh" is currently \$.0834 while the proposed is \$.0911. Yet, in the chart immediately below that the "Current Average Rate per kWh" is listed at \$.09062, while the proposed is \$.09897. Which is it? How is a customer supposed to know what to think when presented with apparently conflicting information? The lack of clarity is confounding.

4. One avenue that s/he might pursue would be to contact someone s/he has reason to believe would provide a simple, straight answer, someone who represents the public interest. That someone is the Public Counsel, though, again, too many customers are probably not aware that the Public Counsel is advocating on their behalf in these proceedings. In the past, however, they have been given that information on this very

notice. Here it is omitted and the customer is only directed to the WUTC or the utility itself. We feel this is a serious omission.

5. Finally, the most striking departure is the removal of the returnable response card to make it easy for the customer to file comments with the Commission. This is one of the simplest and most accessible means that a PSE customer can make herself heard. WE understand that the utilization of this type of notice has been improved since PSE last sent customers such a rate case notice. It may still not be the ideal tool, but it remains far superior to having nothing. The mere presence of the form will move some customers to comment who otherwise would not make the effort.

III. CONCLUSION

6. While we have focused on just four of the objectionable departures Public Counsel identifies in PSE's proposed customer notice, we believe all their objections have merit. We also join others in encouraging a rulemaking with regard to customer notice issues to establish a common set of rules and format for the communication. We believe the result will be less time spent addressing the issue when it comes up in each rate case and will provide consumers with a more accessible means to inform the Commission of the impacts they see the rate cases having on them.

September 1, 2009

Respectfully submitted,

Charles M. Eberdt, Director

The Energy Project