



**Washington  
State Labor  
Council,  
AFL-CIO**

**July 1, 2020**

**Chair Dave Danner  
Commissioner Ann Rendahl  
Commissioner Jay Balasbas  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503**

**Re: Washington State Labor Council Comments on utility customer relief policies during COVID-19, U-200281.**

Dear Chair Danner, Commissioners Rendahl, and Commissioner Balasbas,

Thank you for the opportunity to comment on utility policies during COVID-19. The Washington State Labor Council represents 550,000 workers and is the largest labor organization in the state. Among those are workers at the lower end of the income spectrum, many essential workers, and others who are profoundly impacted by the economic displacement caused by COVID-19. In addition, our members include many utility employees and workers who rely on the sector to provide jobs in construction, maintenance and operations.

Utilities operate under a clear regulatory compact with the state and its residents—that in exchange for ongoing business certainty and guaranteed rate of return, that companies must serve the public interest. As our nation grapples with an unprecedented health and economic crisis, now is the time for utilities to honor this obligation in service of their most vulnerable customers as well as broader economic stability. At the same time, we recognize that the ability for utilities to affordably and reliably serve customers and comply with regulations that will require substantial new investments, including the Clean Energy Transformation Act and the Clean Buildings for Washington Act that were strongly supported by the Labor Council and our affiliates, will depend on their ability to meet their financial obligations in a timely and predictable manner. A balanced solution to the current crises will provide short-term needed relief alongside medium-term cost recovery certainty.

With these considerations in mind, we recommend that the Commission adopt clear policies that will ease burdens on customers while in the long-term stabilizing utility revenue:

- Ensure all households remain connected to essential utility services. The Commission should ensure protections continue as long as necessary for the employment situation to stabilize and return to normal, which is likely to extend beyond the point that the economy begins to recover.

- Provide flexible and robust repayment programs for customers that fall behind on their bills. Utilities should prioritize maximizing repayment while eliminating additional financial hardship on customers by providing extended payment plans, installments and other mechanisms for assisting impacted customers.
- Hold customers who are unable to pay harmless, including waving any fees, penalties, interest payments and other costs unrelated to normal delivery of service. Utilities should also not pursue reporting to credit rating agencies that may impact customers' long-term financial health even if the utility does not levy new charges. Especially with numerous reports of delayed unemployment payouts and the upcoming expiration of Pandemic Unemployment Assistance, many customers are finding themselves in difficult circumstances that they cannot control, unable even to rely on existing safety net programs that they would be able to turn to under a normal economic downturn.
- Expand bill assistance programs that reduce financial obligations on low income customers as well as other customers impacted by COVID-19 and associated economic distress.
- Provide utilities flexible cost recovery mechanisms, including socializing to other ratepayers lost revenue associated with accounts in arrears. Utilities should be allowed to recover their requisite costs and if at a later date larger numbers of customer accounts become current, extra funding can be returned to ratepayers at that time.

We appreciate the opportunity to comment on Commission planning regarding supporting customers impacted by the current public health and economic crisis and stand ready to engage in this discussion in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Vlad Gutman-Britten', written in a cursive style.

Vlad Gutman-Britten  
Climate & Infrastructure Adviser  
Washington State Labor Council