**Enclosure**

**Jefferson County Comprehensive Management Plan Review**

**TG-160343**

Commission staff comments for consideration:

* Alternative B – Institute Program of Discounts for Low-Income Senior Citizen Families, Page 6.5, the Plan states, “Implementing this approach in the certificated area is allowed by State law (RCW 81.77.195) and would require that Jefferson County adopt a service level ordinance for this.”
  + Commission staff understands that under this RCW, commission staff may approve rates, charges, or services at a discount for low-income senior customers, however WAC 480-70-336(4) states, “The company's owners or stockholders are responsible for the revenue not collected by providing service at free or reduced rates. Ratepayers will not subsidize the revenue a company donates by providing service at free and reduced rates.”