

Summary of Comments

The Commission received responses to its August 3, 2022, Notice of Opportunity to File Written Comments regarding potential changes to current customer notice, credit and collections rules for the natural gas (WAC 480-90) and electric (WAC 480-100) industries. The following investor-owned utilities have submitted their comments: Avista Corporation (Avista), Cascade Natural Gas Company (Cascade), Northwest Natural Gas Company (NW Natural), Pacific Power and Light (PacifiCorp) and Puget Sound Energy (PSE). The following customer advocates have provided responses as well: Public Counsel Unit of the Washington State Attorney General’s Office (Public Counsel), The Energy Project (TEP), and The Sierra Club.

*Please note The Sierra Club provided responses for questions 1e, 1f, and 1g only.

Questions for Consideration

1. *Regarding requests for the Commission to consider whether disconnecting customers for non-payment remains necessary:*
 - a. *What is the annual and average cost to the utility to (a) disconnect and (b) reconnect customers? What customer count is used in these calculations?*
 - b. *What is the annual and average cost to the utility due to a customer’s late payment? What customer count is used in these calculations?*
 - c. *How much revenue does the utility collect annually from customers for (a) disconnection, (b) reconnection, and (c) late fees?*
 - d. *What concerns factor against eliminating disconnections for non-payment?*
 - e. *Please explain how disconnecting customers for non-payment is, or is not, in the public interest.*
 - f. *Is there a practice that would be more equitable than disconnection for non-payment?*
 - g. *How else could companies be assured that customers would continue to pay or seek assistance if disconnection for non-payment were disallowed?*

Question	Summary of Comments
Avista	
1a.	As provided in previous comments, ¹ Avista does not specifically track the total costs incurred to disconnect or reconnect its residential customers each year. Based off of simple estimates regarding the average cost per premise visit for a disconnection or reconnection in Washington in 2018 and 2019, the Company estimates it incurred at least \$602,383 for premise visits in 2018 and \$412,270 in 2019. These approximations are based off of a premise visit count of 12,261 and 8,327, respectively, and are solely based on the estimated average cost for travel time and duration of disconnect/reconnect process for a premise visit. Costs encountered during the actual request for reconnect (speaking with a Customer Service Representative (CSR), for example) or any costs associated with Advanced Metering Infrastructure (AMI) disconnects/reconnects or other software systems are also not included.
1b.	There are a multitude of factors to consider when determining the costs to the utility for a customer’s late payment. While Avista does not charge late fees to its Washington customers, the costs associated as a result of late payments are spread amongst all customers, including those that consistently pay on time. Costs associated with late payments include past due notices, final notices, automated collections call, and the cost

¹ See Docket No. U-210800, Comments of Avista Utilities, April 29, 2022.

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	<p>associated with customers speaking with CSRs to establish payment arrangements, accept payments, and answer general account questions pertaining to arrearages. The cost to the Company for each notice is roughly \$.66. In 2018, the Company’s costs were approximately \$142,490 and in 2019 costs were approximately \$146,626, for an average annual amount of \$144,558. In addition to notices delivered by mail, customers receive an automated callout. Avista estimates these calls to cost the company \$.17 per call. In 2018 the Company placed 64,421 automated collections calls for an estimated cost of \$10,951. In 2019 Avista placed 64,124 automated collections calls with an annual cost of \$10,901. Customers in collections will often call to discuss their accounts with a Customer Service Representative. In order to estimate this volume, the Company broke down the number of customers in collections and determined the number of customers who contacted Avista address their account. The average cost per call is currently \$9.26. The Company estimates that 30,149 contacts were made with Avista in 2018 and 26,409 customers in 2019 to discuss their past due balances. Therefore, we can estimate a cost to the Company to handle these calls to be approximately \$279,180 in 2018 and \$244,547 in 2019 with annual average of \$261,864.</p> <p>Known low-income customers receive a premise visit prior to disconnection as well as customers whose meters are not capable of remote disconnection and reconnection. Please see the Company’s response to 1(a) above for the total costs associated with premise visits for disconnection for non-payment.</p> <p>In addition to the impacts above, the Company refers customers who have unpaid debt on closed accounts or unpaid prior obligation balances to a third-party collection agency. The agencies are compensated by the Company based on a percentage of the dollars they collect. In 2018, collection agency fees totaled \$197,381 and \$225,547 in 2019 for an average cost of \$211,463.</p>															
1c.	<p>The table below represents the annual amount collected from residential customers for disconnections and reconnections in 2018 and 2019. Avista does not charge customers late payment fees in the state of Washington and therefore does not have data to provide.</p> <table border="1" data-bbox="358 1136 1430 1339"> <thead> <tr> <th></th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Electric Field Visit Disconnect</td> <td>\$7,584</td> <td>\$4,096</td> </tr> <tr> <td>Natural Gas Field Visit Disconnect</td> <td>\$152</td> <td>\$128</td> </tr> <tr> <td>Electric Reconnect</td> <td>\$119,800</td> <td>\$164,061</td> </tr> <tr> <td>Natural Gas Reconnect</td> <td>\$3,926</td> <td>\$4,080</td> </tr> </tbody> </table>		2018	2019	Electric Field Visit Disconnect	\$7,584	\$4,096	Natural Gas Field Visit Disconnect	\$152	\$128	Electric Reconnect	\$119,800	\$164,061	Natural Gas Reconnect	\$3,926	\$4,080
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1d.	<p>The primary concern factoring against eliminating disconnections for non-payment is arrearage debt, which leads to larger write-offs that all customers must, in turn, pay for. Under the current Prior Obligation rules and moratorium on fees and deposits, a residential customer in Washington essentially has no requirement to pay for the service they receive as there are no payments or fees required to turn on service and no payments or fees required to be reconnected for service following a disconnection for non-payment, allowing arrears to continue to become unmanageable. Using Avista’s self-imposed moratorium on disconnections during its Customer Care and Billing (CC&B) system implementation as an example—during which the Company did not disconnect customers for non-payment between January 2015 through July 2015—arrears skyrocketed in the absence of disconnections. For comparison purposes, 35% of Washington residential customers were past due in May 2015 versus 24% in May 2014 and 21% in May of 2016. Arrears did not begin to decline until the Company resumed disconnections for non-payment.</p>															
1e.	<p>As a last resort, after all other bill, payment, and energy assistance has been offered, disconnecting customers for non-payment is in the public interest. Ultimately, customers bear the responsibility for taking action to address their bills—energy and otherwise.</p>															

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	<p>Utilities offer a significant number of tools for customers to pay their energy bill or seek assistance to pay their energy bill if they are struggling to do so. Additionally, utilities provide ample notice through several formats (i.e., letters, email, phone calls) and attempt to reach customers well before disconnection is even an option. If a customer does not utilize the tools available to them and does not contact the utility or allow the utility to reach them for arrangements or assistance, then yes, disconnection of an unpaid service should be the result.</p> <p>Further, disconnections have proven to be a valid “call to action”. Avista provides a valid case study for whether or not disconnections are an effective tool in minimizing arrearage debt, as it serves customers both in Washington and Idaho—states that have very different approaches to how the collections and disconnection processes should be handled. For example, when the COVID-19 pandemic began in March of 2020, Avista voluntarily stopped collections and disconnections in both Washington and Idaho. In Washington, by way of the Governor’s Executive Orders and subsequent Commission orders, utilities were barred from issuing past due notices and disconnecting customers for a period of time that extended far beyond that of Idaho. When disconnections did finally resume, the utilities were then required to send all customers that were potentially eligible for disconnection due to non-payment through a Commission review process prior to actual disconnection. This added process was essentially an extension of the disconnection moratorium, as the time needed to complete such a review process only further delayed the collections and/or disconnection process, requiring multiple rounds of the Company’s typical collection/noticing cycles and allowing customers to accrue larger balances. As a result of these policies and processes, Avista’s customer arrears in Washington grew substantially. Even with additional COVID-19 debt relief funding and energy assistance available, arrears remained high. In contrast, Idaho—where normal collection practices and disconnections resumed after only a few months—not only did we experience much lower customer arrears but also found that well into the pandemic, arrears were actually lower than pre-pandemic levels. Note that Idaho does not have customer-funded assistance programs like Avista’s Low-Income Rate Assistance Program (LIRAP) in Washington, nor did it have a requirement to provide COVID-19 debt relief funding to assist with customer arrears.² The differences between the Company’s Washington and Idaho experiences clearly show that disconnections are effective in prompting customer payment for their own energy usage and are, therefore, in the public interest. This is not to say that customers should not be offered protections that allow disconnects from occurring—of course they should. For this reason, utilities should continue to be required to offer bill and payment tools, as well as energy assistance that addresses customers’ energy burden and arrears, as Avista does. If these tools are in place and available to customers, then disconnections should occur for those customers that do not take responsibility for their energy bills.</p>
1f.	Avista is unaware of a practice that would be more equitable than disconnections for non-payment, so long as a utility has adequate billing and payment tools and energy assistance offerings available to customers.
1g.	If disconnections for non-payment were disallowed, utilities would have no way of being assured that customers would continue to pay or seek assistance, as customers would have no repercussions for not paying their bills and would therefore have no reason to prioritize their energy bill. The Commission may continue to authorize the recovery of growing arrears and write-offs as a result of no disconnections occurring, but this would simply shift the responsibility from the non-paying customer, instead placing the burden on all other customers, which is not equitable.

² See Docket Nos. UE-210114 and UG-210115.

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<i>Cascade</i>													
1a.	<p>Please note, it has been several years since Cascade Natural Gas has evaluated its fee schedule or done a recent time study. For the purpose of this response, the company is estimating costs for service field trips based on general loaded labor and equipment rates.</p> <table border="1" data-bbox="354 367 1339 520"> <thead> <tr> <th></th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Disconnection costs</td> <td>\$250,600.00</td> <td>\$205,860.00</td> </tr> <tr> <td>Reconnection Costs</td> <td>\$105,800.00</td> <td>\$96,000.00</td> </tr> <tr> <td>Disconnection/Reconnection Counts</td> <td>3,464</td> <td>3,058</td> </tr> </tbody> </table>		2018	2019	Disconnection costs	\$250,600.00	\$205,860.00	Reconnection Costs	\$105,800.00	\$96,000.00	Disconnection/Reconnection Counts	3,464	3,058
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1b.	<p>Cascade’s response to Data Request No. 11(a) filed earlier in comments in this docket on April 29, 2022, showed late fee revenues of \$325,172.48 and \$322,146.63 in 2018 and 2019, respectively. Cascade’s late fee is a 1% charge on past due balances. The average late fee revenue over the two-year period was \$323,659.56. The total past due balances were \$32,365,955.50 (\$323,659.56/1%) annually for an average impact on the receivable balance of \$2,697,162.96 (\$32,365,955.5/12). Working Capital is increased by the \$2.7 million. The average customers charged late fees based on Data Request No. 11 in this docket was 85,272.</p>												
1c.	<p>Cascade Natural Gas does not collect disconnection fees. CNGC does collect a Field Visit fee of \$10 when a technician visits a customer’s premise to disconnect service and that customer takes action to avoid being disconnected - e.g., the customer pays cash at the door or goes to visit a payment location to make a payment. Those fees are included in the total dollar amount of fees and total number of accounts assessed fees. The data also includes reconnection fees for reconnects worked during regular business hours and after hours. 2018 - \$83,971.79 (Field Visit Charge = \$10,484.80) 2019 - \$72,679.96 (Field Visit Charge = \$8,773.28)</p>												
1d.	<p>Without the possibility of disconnecting for non-payment of utility bills, some customers may not be motivated to pay their bills, contact the utility to establish a payment arrangement, or contact the utility and/or Community Action Agency to request bill pay assistance. Allowing arrearages, and ultimately write-offs, to increase would shift the cost to other customers and is out of alignment with the regulatory cost causation principle. In addition, allowing customers to continue to utilize gas service with essentially no obligation to pay could result in unnecessary, increased usage since there would be no risk that the occupant would ultimately be required to pay for the usage. This would place additional burden on a utility’s system as well as the environment. Lastly, allowing customers to continue to utilize natural gas service with no obligation to pay could result in no contact from customers with the utility. Lack of contact with the utility could lead to safety and environmental impacts if the property is abandoned without the utility’s knowledge.</p>												
1e.	<p>Disconnecting customers for non-payment is in the general public’s interest since disconnection of service serves as a motivator for payment for services or to contact the utility or agencies to discuss payment arrangement and/or assistance options. Not disconnecting customers would shift a greater burden of higher write-off balances to other customers and is out of alignment with the regulatory cost causation principle.</p>												
1f.	<p>Many energy assistance options exist to help customers avoid being disconnected for non-pay. In addition, Cascade works with customers to customize payment arrangements based on the customer’s situation and needs. Cascade makes many efforts via multiple communications channels to reach customers to discuss all of these options, including a manual outbound call from our Credit and Collections Team, before taking the last-resort step of disconnection of service. Based on the many options available and the numerous</p>												

Question	Summary of Comments
	contact attempts made before issuing a disconnect order, Cascade cannot think of a more equitable practice.
1g.	<p>For the reasons stated in 1d and 1e, Cascade is not able to develop any methods with which companies could be assured that customers would continue to pay or seek assistance if disconnection for non-payment were disallowed. Customer behavior during the COVID disconnect moratorium and since the full moratorium shifted to the current Commission Staff disconnect review process has provided insight into what would occur if disconnection were completely disallowed. Since the moratorium was implemented in late March 2020 many customers stopped paying their bill and have not made attempts to contact the company to discuss options. Despite having more assistance funding available than at any other time, some through automatic grants requiring no action from the customer, the utility companies experienced record arrearages. Those arrearages have declined since the current WUTC disconnect review process was implemented, but they have not decreased at the same rate as Cascade’s Oregon arrearages where disconnect processes have mostly returned to pre-COVID status. Oregon is moving toward implementing additional protections for customers designated as low-income but not going as far as completely prohibiting disconnections for non-pay for any customers. Cascade believes that is a more reasonable approach than prohibiting disconnects completely. Oregon’s proposed rule changes: NoticeFilingTrackedChanges (17).pdf (state.or.us)</p>

NW Natural

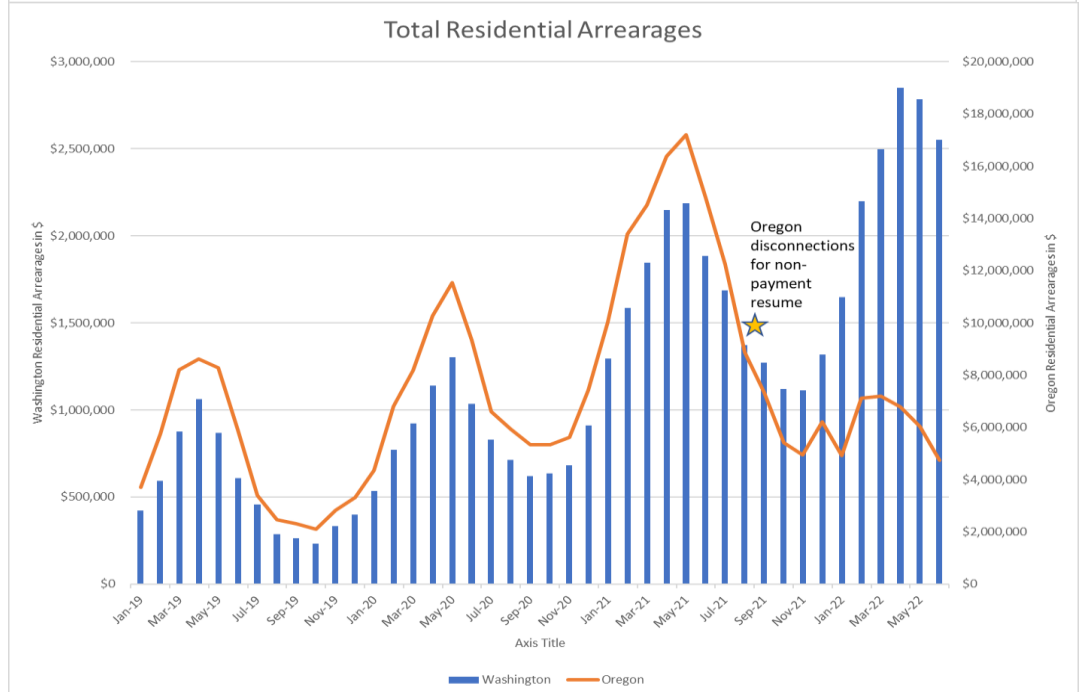
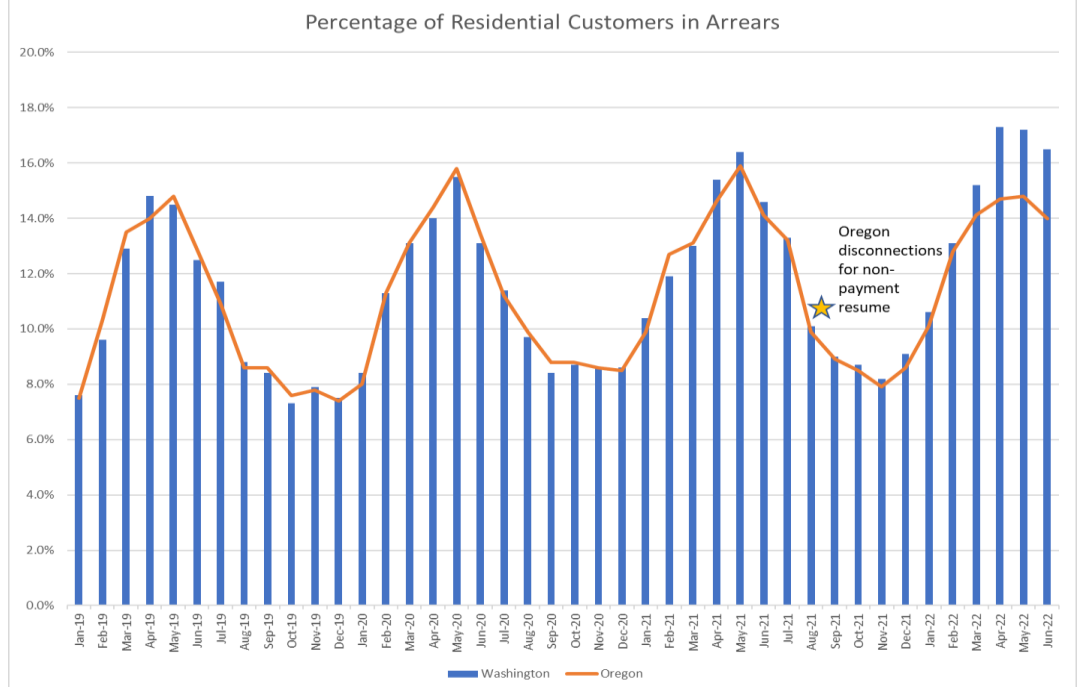
1a.	<p>Please see the following tables for the average and annual costs of disconnections for non-payment and reconnections after disconnections for non-payment. These tables were previously provided in comments submitted April 29, 2022, and further clarified/supplemented on June 21, 2022. As explained in those comments, the costs for these activities are not tracked on a state basis but are allocated for ratemaking purposes using allocation factors – as such, the customer counts and total cost used for the average calculations are system amounts and NW Natural believes that the overall average cost per disconnection and reconnection would not materially differ between Oregon and Washington.</p> <p>Using the “Customers-Residential” allocation factors from the 2018 and 2019 Commission Basis Reports, the costs for disconnections for non-payment and reconnections after disconnection for non-payment allocated to Washington would be as follows:</p>
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Annual Cost Per Year	2018	2019
All Disconnections	\$136,985	\$138,924
Disconnections for non-payment	\$97,290	\$96,917
Annual Cost Per Year	2018	2019
All Reconnections	\$291,543	\$275,633
Reconnections after disconnections for non-payment	\$90,274	\$85,988
Average Annual Cost Per Year	2018	2019
All Disconnections	\$25.25	\$26.03
Disconnections for non-payment	\$24.63	\$25.07
All Reconnections	\$66.41	\$66.12
Reconnections after disconnection for non-payment	\$61.14	\$60.86

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1b.	<p>NW Natural has calculated a rough estimate of the annual and average cost due to late payments as follows, with the following caveats/assumptions noted: Annual cost – \$114,910 Average cost – \$2.05 per overdue customer per month</p> <p><u>Assumptions:</u></p> <ul style="list-style-type: none"> • (Average Customer Bill x Short Term Interest rate x annual average number of residential Washington customers paying late) • (\$67.93 x 3.01% x 56,199) = \$114,910 • Customers with balances 31-60 days aged used for “late” payments – customers with older balances will be more likely to move toward disconnection pathways versus just being “late” • Used average of 2019-2021 number of residential Washington customers 31-60 days aged <p><u>Caveat:</u></p> <ul style="list-style-type: none"> • NW Natural has used a current short term interest rate for July 2022. Short term interest rates fluctuate and we have not forecasted these fluctuations but have calculated a rough annual estimate by multiplying that rate by the annual average number of Washington customers paying late. Actual rates could be materially different. 																				
1c.	<table border="1" data-bbox="358 762 1430 911"> <thead> <tr> <th data-bbox="358 762 651 800">Washington</th> <th data-bbox="651 762 862 800">2018</th> <th data-bbox="862 762 1065 800">2019</th> <th data-bbox="1065 762 1252 800">2020*</th> <th data-bbox="1252 762 1430 800">2021*</th> </tr> </thead> <tbody> <tr> <td data-bbox="358 800 651 837">Disconnect Fees</td> <td data-bbox="651 800 862 837">\$0.00</td> <td data-bbox="862 800 1065 837">\$0.00</td> <td data-bbox="1065 800 1252 837">\$0.00</td> <td data-bbox="1252 800 1430 837">\$0.00</td> </tr> <tr> <td data-bbox="358 837 651 875">Reconnect Fees</td> <td data-bbox="651 837 862 875">\$53,320.00</td> <td data-bbox="862 837 1065 875">\$52,745.00</td> <td data-bbox="1065 837 1252 875">\$18,830.00</td> <td data-bbox="1252 837 1430 875">\$205.00</td> </tr> <tr> <td data-bbox="358 875 651 911">Late Fees</td> <td data-bbox="651 875 862 911">\$88,714.84</td> <td data-bbox="862 875 1065 911">\$90,570.89</td> <td data-bbox="1065 875 1252 911">\$33,457.11</td> <td data-bbox="1252 875 1430 911">\$15,914.59</td> </tr> </tbody> </table> <p data-bbox="358 911 1430 978">*2020 and 2021 do not represent normal years due to the moratorium on late fees and reconnection fees. NW Natural does not charge disconnection fees.</p>	Washington	2018	2019	2020*	2021*	Disconnect Fees	\$0.00	\$0.00	\$0.00	\$0.00	Reconnect Fees	\$53,320.00	\$52,745.00	\$18,830.00	\$205.00	Late Fees	\$88,714.84	\$90,570.89	\$33,457.11	\$15,914.59
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1d.	<p>NW Natural believes that reinforcement of the pathways to preventing non-payment is essential to preventing disconnections. Disconnection is not the utility’s goal and is always the last resort after providing multiple opportunities to prevent it. We have a variety of programs and options designed to meet that objective while promoting energy efficiency and bill payment flexibility, such as Equal Pay, Time Payment Agreements, preferred due dates, the federal Low-Income Home Energy Assistance Program (LIHEAP), NW Natural’s Gas Residential Energy Assistance Tariff (GREAT), our Gas Assistance Program (GAP), and our Washington Low-Income Energy Efficiency (WA-LIEE) program. In addition, NW Natural will have a rate discount program pursuant to SB 5295 that will alleviate energy burden for low-income customers while also reinforcing the pathways to preventing non-payment and helping those customers to feel a sense of stability regarding their access to gas service.</p> <p>With these programs and options available to assist customers, disconnection for non-payment is less probable. However, in order to protect all customers and to preserve the principle of cost causation in utility ratemaking, disconnection for non-payment remains necessary and in the public interest as a “last resort” option when customers do not pay for the utility service and natural gas they consume.</p> <p>NW Natural has concerns with the disallowance of disconnection as a potential deterrent to non-payment. It is assumed that a utility will provide a service to its customers, and, in turn, customers will pay for that service, or it will be disconnected until arrangements are made. If a customer cannot meet that obligation, temporarily or in the long-term due to financial hardship, utilities understand they bear some responsibility to their customers and communities to assist by providing resources to help ensure these essential services are not disrupted. As mentioned above, utilities have many programs and options available to assist customers with payments and can provide information and offer flexible payment</p>																				

Question	Summary of Comments
	<p>arrangements.</p> <p>Allowing customers to build large balances produces an inequitable outcome and negative experience for these customers, and results in increased costs (for all customers) for the costs associated with bad debt in a manner that fails to address the energy burden they experience. Those costs would be better invested in low-income discount programs, energy assistance, and energy efficiency programs and compelling customers to request budget plans, time payment arrangements or due date extensions as needed. It would be more cost-effective and empowering to encourage customers to take advantage of and participate in programs and to interact with their utilities and local resources to prevent non-payment and bad debt.</p> <p>The following graphs potentially illustrate the impact of allowing disconnections for non-payment. In both Oregon and Washington, NW Natural suspended disconnections for non-payment for residential customers through the majority of 2020 and 2021. In Oregon, disconnections for non-payment resumed in August of 2021.</p> <p>As the first graph indicates, the comparison between the two states of the percentage of residential customers in arrears typically trends symmetrically, but a variance has emerged since disconnections for non-payment resumed in Oregon. The percentage of residential customers in arrears in Washington is trending higher, while the percentage of residential customers in arrears in Oregon has returned to pre-pandemic levels.</p> <p>The second graph illustrates the comparison between the two states of the total residential arrearage dollars, and the trend is symmetrical once again until the point at which disconnections for non-payment resumed in Oregon. After that point, Washington arrearage balances continue to grow while Oregon arrearage balances have returned to pre-pandemic levels.</p>

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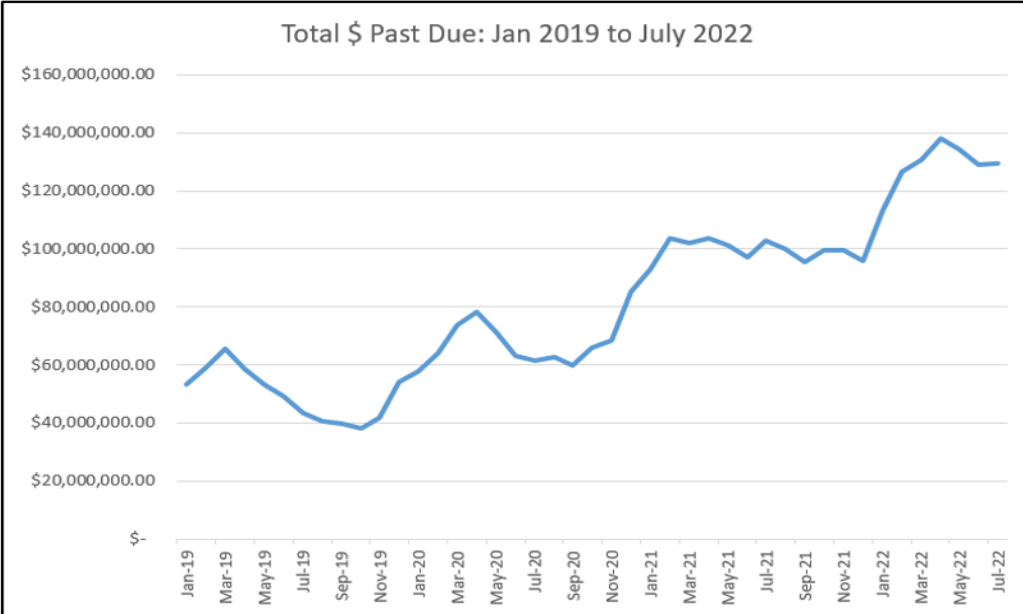


1e.	<i>See above response for response to 1e.</i>
1f.	<i>See above response for response to 1f.</i>
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PacifiCorp	

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1a.	<p>As discussed in our previous comments submitted on April 29, 2022, PacifiCorp does not have a charge for disconnection of service and does not track the specific costs for disconnecting or reconnecting service. The estimated costs in the table below are based on the average calculation of time to perform the reconnection of service, the wage of the employee doing the reconnection, and how many disconnection and reconnection requests were completed. PacifiCorp estimates the cost of disconnecting service to be commensurate with the cost of reconnecting service during normal office hours.</p> <table border="1" data-bbox="354 464 1442 831"> <thead> <tr> <th colspan="3" data-bbox="354 464 1442 554">Estimated Collection Costs - Disconnection and Reconnection of Service for Non-Payment</th> </tr> <tr> <th data-bbox="354 554 829 590">Category</th> <th data-bbox="829 554 1127 590">2018</th> <th data-bbox="1127 554 1442 590">2019</th> </tr> </thead> <tbody> <tr> <td data-bbox="354 590 829 630">Active Agreements</td> <td data-bbox="829 590 1127 630">122,780</td> <td data-bbox="1127 590 1442 630">124,060</td> </tr> <tr> <td data-bbox="354 630 829 669">Disconnection of Service</td> <td data-bbox="829 630 1127 669">\$45,835.06</td> <td data-bbox="1127 630 1442 669">\$33,260.84</td> </tr> <tr> <td data-bbox="354 669 829 709">Reconnection - Normal Office Hours</td> <td data-bbox="829 669 1127 709">\$29,347.80</td> <td data-bbox="1127 669 1442 709">\$18,634.66</td> </tr> <tr> <td data-bbox="354 709 829 749">Reconnection - After Hours</td> <td data-bbox="829 709 1127 749">\$12,452.00</td> <td data-bbox="1127 709 1442 749">\$11,528.00</td> </tr> <tr> <td data-bbox="354 749 829 831">Reconnection - Weekend/Holiday</td> <td data-bbox="829 749 1127 831">\$2,912.26</td> <td data-bbox="1127 749 1442 831">\$2,668.24</td> </tr> </tbody> </table>	Estimated Collection Costs - Disconnection and Reconnection of Service for Non-Payment			Category	2018	2019	Active Agreements	122,780	124,060	Disconnection of Service	\$45,835.06	\$33,260.84	Reconnection - Normal Office Hours	\$29,347.80	\$18,634.66	Reconnection - After Hours	\$12,452.00	\$11,528.00	Reconnection - Weekend/Holiday	\$2,912.26	\$2,668.24
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1b.	<p>This is not a calculation that can be easily quantified without significant further analysis. Late payments impact the utility and its customers in several ways, but may include items such as increased uncollectible expense, interest, additional noticing and communication costs, and potential costs in efforts to collect the late payment.</p>																					
1c.	<p>The table below includes the Washington revenues received from reconnection fees and late fees in 2018 and 2019. PacifiCorp does not charge a disconnection fee. PacifiCorp is providing 2018 and 2019 data as there were no reconnection or late fees in 2020 and 2021 during the COVID-19 pandemic moratorium.</p> <table border="1" data-bbox="354 1140 1442 1262"> <thead> <tr> <th data-bbox="354 1140 829 1180"></th> <th data-bbox="829 1140 1127 1180">2018</th> <th data-bbox="1127 1140 1442 1180">2019</th> </tr> </thead> <tbody> <tr> <td data-bbox="354 1180 829 1220">Reconnection Fees</td> <td data-bbox="829 1180 1127 1220">\$51,870.00</td> <td data-bbox="1127 1180 1442 1220">\$718,458.30</td> </tr> <tr> <td data-bbox="354 1220 829 1262">Late Fees</td> <td data-bbox="829 1220 1127 1262">\$40,020.00</td> <td data-bbox="1127 1220 1442 1262">\$734,268.90</td> </tr> </tbody> </table>		2018	2019	Reconnection Fees	\$51,870.00	\$718,458.30	Late Fees	\$40,020.00	\$734,268.90												
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1d.	<p>If disconnections for non-payment are eliminated, PacifiCorp is concerned that customers will no longer be motivated to contact the company to establish payment arrangements, seek out energy assistance, and/or pay their utility bills. Without the noticing and engagement created by the disconnection process, PacifiCorp is left unable to recover unpaid amounts from customers and the rest of the Company’s customers end up socializing the cost and increasing their energy burden. Past due balances grew significantly during the COVID-19 disconnection moratorium, despite the expansion of the Company’s Low Income Bill Assistance (LIBA) Program and the increased availability of energy assistance funds. Agencies who administer these assistance programs reported a decline in customers seeking energy assistance during the moratorium, and specifically noted the absence of repeat customers who seek out assistance annually. Eliminating disconnections for non-payment on a permanent basis will exacerbate this phenomenon.</p> <p>Further, without the disconnection of service process, customers will be less incentivized to conserve energy. The result of increased and unchecked usage would place additional burden on the utility’s system. This would further hurt the public interest as it will shift an increasing burden of unpaid and uncollectible balances to the rest of the utility’s customers.</p>																					

Question	Summary of Comments																																													
	PacifiCorp believes that the existing disconnection rules motivate customers to engage with the Company, which allows the utility to establish payment plans and refer customers to energy assistance agencies for additional help to avoid disconnection. PacifiCorp is not aware of a more equitable method to prevent disconnection for non-payment but is receptive to hearing from other stakeholders and utilities on how to help alleviate disconnection of service for non-payment while keeping arrearages down and maintaining price signals for customers.																																													
1e.	As discussed above, absent disconnection utilities are left unable to recover unpaid amounts from customers and the rest of the Company’s customers end up socializing the cost. This policy risks increasing their energy burden on more customers. Please also refer to the additional issues identified in the Company’s response to subsection d.																																													
1f.	PacifiCorp is not aware of a more equitable practice. For customers that have refused to pay and refused outreach efforts, disconnection is the last option to provide assistance and address energy burden. The Company is receptive to hearing from other stakeholders and utilities on how to help alleviate disconnection of service for non-payment while keeping arrearages down and maintaining price signals for customers.																																													
1g.	PacifiCorp is not aware of another mechanism.																																													
PSE																																														
1a.	<p>(i) Annual cost to the utility to disconnect residential customers, and the customer count used to determine those costs is represented in the table below. The customer count provided below includes individual customers that have been disconnected and reconnected multiple times. PSE would likely incur the same or increased costs associated with outreach even without the process of disconnection as it would be the only means to seek payment for past due balances.</p> <table border="1" data-bbox="354 1073 1425 1346"> <thead> <tr> <th></th> <th colspan="2">Disconnection Costs</th> </tr> <tr> <th>Fee Category</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Call Center</td> <td>\$1,450,991</td> <td>\$1,196,157</td> </tr> <tr> <td>Phone Outreach</td> <td>\$1,766,906</td> <td>\$2,017,561</td> </tr> <tr> <td>Customer Notices</td> <td>\$729,551</td> <td>\$941,614</td> </tr> <tr> <td>Field Operations</td> <td>\$1,677,273</td> <td>\$1,412,554</td> </tr> <tr> <td>Total Annual Cost-Residential</td> <td>\$5,624,722</td> <td>\$5,567,885</td> </tr> </tbody> </table> <table border="1" data-bbox="354 1346 1425 1461"> <thead> <tr> <th></th> <th colspan="2">Disconnections</th> </tr> <tr> <th>Customer Count</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>3,958,789</td> <td>3,326,850</td> </tr> </tbody> </table> <p>(ii) Annual cost to the utility to reconnect residential customers, and the customer count used to determine those costs is represented in the table below. The customer count provided below includes individual customers that have been disconnected and reconnected multiple times.</p> <table border="1" data-bbox="354 1644 1425 1862"> <thead> <tr> <th></th> <th colspan="2">Reconnection Costs</th> </tr> <tr> <th>Fee Category</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Call Center</td> <td>\$1,200,998</td> <td>\$1,009,524</td> </tr> <tr> <td>Field Operations</td> <td>\$1,542,108</td> <td>\$1,303,637</td> </tr> <tr> <td>Total Annual Cost-Residential</td> <td>\$2,743,106</td> <td>\$2,313,161</td> </tr> </tbody> </table>		Disconnection Costs		Fee Category	2018	2019	Call Center	\$1,450,991	\$1,196,157	Phone Outreach	\$1,766,906	\$2,017,561	Customer Notices	\$729,551	\$941,614	Field Operations	\$1,677,273	\$1,412,554	Total Annual Cost-Residential	\$5,624,722	\$5,567,885		Disconnections		Customer Count	2018	2019	Residential	3,958,789	3,326,850		Reconnection Costs		Fee Category	2018	2019	Call Center	\$1,200,998	\$1,009,524	Field Operations	\$1,542,108	\$1,303,637	Total Annual Cost-Residential	\$2,743,106	\$2,313,161
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Average Cost													
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	4,161,731	3,463,620											
	164,285	135,644											
	4,326,016	3,599,264											
	<p>^[1] Includes customer count for all the types of activities associated with disconnection and reconnection in PSE's responses to 1(a) and (b).</p>												
1b.	<p>This is a very broad question that depends on the scope and types of costs that are incurred. This could include multiple categories of costs such as utility losses, carrying costs of debt, amortization costs, etc. PSE looks forward to discussing all types of costs that should be considered.</p>												
1c.	<table border="1"> <thead> <tr> <th colspan="2" data-bbox="342 1136 967 1213">Dollar Amount Collected in Late Fees</th> </tr> <tr> <th data-bbox="342 1213 967 1249">Type</th> <th data-bbox="967 1213 1455 1249"></th> </tr> </thead> <tbody> <tr> <td data-bbox="342 1249 967 1304">Residential</td> <td data-bbox="967 1249 1455 1304"></td> </tr> </tbody> </table>	Dollar Amount Collected in Late Fees		Type		Residential		2018	2019				
Dollar Amount Collected in Late Fees													
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	\$1,859,432	\$1,655,745											
1d.	<p>Disconnections are a backstop engagement and information gathering tool for utilities to reach customers that have not been responsive to prior attempts by the utility. PSE may glean information from the disconnection process that enables PSE to provide payment options or other forms of assistance that help the customer bring their accounts into good standing. Without a disconnection engagement, there is no mechanism for the utility to recover any of the unpaid amounts due, leaving all other utility customers with an increasing burden. Due to Washington's prior obligation regulations, under which PSE may not deny new or additional service to a customer with a bad debt, there is little motivation for the customer to engage with the utility making it difficult for PSE to determine how it can help. The information gathered during this disconnection process may also inform energy assistance work at the utilities and the Commission, as well as provide insights into these populations that enable us to better understand their needs. Additionally, customers can, and do, amass multiple delinquent accounts because they cannot be denied new or additional service due to nonpayment of a prior accounts. Once disconnected for nonpayment, they are rapidly reconnected after contacting PSE. For customers with a remote reconnection capable meter, customers are reconnected to service</p>												

Question	Summary of Comments																																														
	<p>usually within 4 hours of the customer initiating the request. For manual reconnections, PSE generally can reconnect the same day, if not within 24 hours.</p> <p>During the disconnection moratorium, PSE has seen past due balances grow significantly despite providing three separate emergency assistance programs (CACAP 1-3) in addition to PSE HELP and increased LIHEAP funding. In January of 2019, PSE’s past due balances totaled \$53,328,135.10. January of 2022 past due balances totaled \$113,207,289.24. This represents an increase of 112.3% over the two-year period. Past due balances continue to grow into July (by 14.4%), which is unusual as July is typically one of the lowest months for past due balances. PSE provides the chart below to illustrate this trend.</p>  <table border="1" data-bbox="365 533 1382 1142"> <caption>Total \$ Past Due: Jan 2019 to July 2022</caption> <thead> <tr> <th>Month</th> <th>Total \$ Past Due</th> </tr> </thead> <tbody> <tr><td>Jan-19</td><td>\$53,328,135.10</td></tr> <tr><td>Mar-19</td><td>\$65,000,000.00</td></tr> <tr><td>May-19</td><td>\$55,000,000.00</td></tr> <tr><td>Jul-19</td><td>\$45,000,000.00</td></tr> <tr><td>Sep-19</td><td>\$40,000,000.00</td></tr> <tr><td>Nov-19</td><td>\$55,000,000.00</td></tr> <tr><td>Jan-20</td><td>\$60,000,000.00</td></tr> <tr><td>Mar-20</td><td>\$75,000,000.00</td></tr> <tr><td>May-20</td><td>\$65,000,000.00</td></tr> <tr><td>Jul-20</td><td>\$60,000,000.00</td></tr> <tr><td>Sep-20</td><td>\$65,000,000.00</td></tr> <tr><td>Nov-20</td><td>\$85,000,000.00</td></tr> <tr><td>Jan-21</td><td>\$100,000,000.00</td></tr> <tr><td>Mar-21</td><td>\$105,000,000.00</td></tr> <tr><td>May-21</td><td>\$100,000,000.00</td></tr> <tr><td>Jul-21</td><td>\$105,000,000.00</td></tr> <tr><td>Sep-21</td><td>\$95,000,000.00</td></tr> <tr><td>Nov-21</td><td>\$100,000,000.00</td></tr> <tr><td>Jan-22</td><td>\$113,207,289.24</td></tr> <tr><td>Mar-22</td><td>\$130,000,000.00</td></tr> <tr><td>May-22</td><td>\$125,000,000.00</td></tr> <tr><td>Jul-22</td><td>\$130,000,000.00</td></tr> </tbody> </table>	Month	Total \$ Past Due	Jan-19	\$53,328,135.10	Mar-19	\$65,000,000.00	May-19	\$55,000,000.00	Jul-19	\$45,000,000.00	Sep-19	\$40,000,000.00	Nov-19	\$55,000,000.00	Jan-20	\$60,000,000.00	Mar-20	\$75,000,000.00	May-20	\$65,000,000.00	Jul-20	\$60,000,000.00	Sep-20	\$65,000,000.00	Nov-20	\$85,000,000.00	Jan-21	\$100,000,000.00	Mar-21	\$105,000,000.00	May-21	\$100,000,000.00	Jul-21	\$105,000,000.00	Sep-21	\$95,000,000.00	Nov-21	\$100,000,000.00	Jan-22	\$113,207,289.24	Mar-22	\$130,000,000.00	May-22	\$125,000,000.00	Jul-22	\$130,000,000.00
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1e.	Disconnecting customers for non-payment is in the public interest for the reasons set forth in PSE’s response above to question 1(d).																																														
1f.	A pre-pay program may provide an additional tool to help customers avoid disconnection along with the suite of programs PSE currently has in place that are aimed at reducing disconnections and/or reducing the customer’s bill: Home Energy Lifeline (HELP) grant program, Salvation Army Warm Home Fund, Budget Billing, Low Income Weatherization and Long-Term Payment Plans. Pre-pay programs have been adopted successfully at Salt River Project and Georgia Power with high customer adoption rates ³ . Although these programs would not replace disconnection for non-payment, they can be utilized to avoid disconnections when the customer requests those services. Disconnections provide a backstop to help the utility reach customers that have not engaged in utility payment arrangement and assistance programs to connect them with options that recognize their individual circumstances and result in equitable outcomes.																																														
1g.	PSE is receptive to dialog on alternatives to disconnection and looks forward to hearing what others propose on this important matter.																																														
Public Counsel																																															
1a.	Currently, accounts in arrears that move to disconnection for nonpayment are sent to collections if the utility is unable to recover unpaid balances from customers directly.																																														
1b.																																															
1c.																																															

³ See Salt River Project’s M-Power Program – www.srpnet.com and Georgia Power’s Pre-pay program at – www.georgiapower.com.

Question	Summary of Comments
	<p>through uncollectibles. Disconnection, reconnection, and late fees should not be a revenue generator. These fees are set to recover the costs, such as staff and administrative time, associated with disconnecting, reconnecting, and processing accounts in arrears. collecting these fees could result in double or over-collection of costs. Staff and administrative costs are recovered through operations and maintenance (O&M) expenses in customer rates. Thus, it follows that customers already pay for staff related costs to handle late payments, disconnections, and reconnections. Collecting fees from customers to cover these costs is duplicative and would simply amount to additional revenue generated for the utility. Disconnection, reconnection, and late fees are targeted at customers who have trouble staying current on their utility bills. These customers likely are part of highly impacted or vulnerable communities. Assessing fees on customers who are already struggling to meet basic expenses only make it more difficult to maintain connection to essential, life-giving services. In this way, and if these fees indeed represent an additional revenue generator for utilities at the expense of vulnerable customers, these fees are predatory. They also further the cycle of debt, as customers struggling to pay are simply required to pay more than customers who have the financial wherewithal to stay current on bills. Given the disproportionate impact fees have on highly impacted, vulnerable, and low-income customers, permitting these practices to continue stands in opposition to the Commission’s and Washington’s equity goals and objectives.</p>
1d.	<p>Prior obligations are an issue that the Commission would have to address with the utilities and stakeholders. Forbidding disconnections for non-payment would not remove a customer’s obligation to pay for utility service. To that extent, the utilities must be diligent in enrolling qualifying customers in arrearage management plans and/or payment plans to eliminate those obligations. While this is not a reason to continue disconnections, it is an issue that must be given careful consideration</p>
1e.	<p>Disconnection for non-payment is not in the public interest; recent events and research bear this out. Electric and natural gas utilities are an essential service that help individuals carry out basic life functions to support survival and promote the ability to be an active member of society and participant in the economy Black and Latinx households are more likely to receive disconnection notices than white households at similar income levels.³ Not only are communities of color more likely to receive disconnection notices, but they are also more likely to be disconnected from utility service than white households.⁴ Disconnection for nonpayment is an inequitable practice in its current form and it is incumbent upon policymakers to address this.</p>
1f.	<p>Many regulated utilities are in the process of implementing or have implemented programs designed to keep customers connected by delivering assistance that effectively reduce energy burden and assist customers in eliminating past due balances. In pilot programs, arrearage management programs and percentage of income payment plans have shown promise and utilities are moving toward these programs. These programs help people stay connected to prevent the process of disconnection from initiating, and there is no evidence that they deter customers from paying their bills when they are able.</p> <p>Currently, bill assistance programs across all Washington regulated utilities are undersubscribed, meaning that only a small share of income-eligible customers are enrolled in programs. Removing the threat of disconnection for non-payment provides an extremely strong incentive for utilities to promote their assistance offerings and ensure that eligible customers are enrolled. Limiting the ability of utilities to disconnect customers does not necessarily have to involve a complete prohibition on disconnections. For example, rules could specify that low-income customers cannot be disconnected. As a result, this would</p>

Question	Summary of Comments
	<p>open the door to utilities verifying customers' household incomes and initiating the process for bill assistance enrollment.</p> <p>The threat of disconnection is not a substitute for outreach. Investing the time and resources to reaching customers in need and connecting them with the appropriate resources to remain connected to utility will result in more equitable outcomes than leveraging a tool of last resort to strong arm customers into engagement. Even if some stakeholders believe that the threat of disconnection is the only or most effective tool for engagement, this practice perpetuate well established inequities and the debt cycle that catches many vulnerable customers.</p>
1g.	Limiting the utilities' ability to disconnect customers for non-payment does not remove any customer's obligation to pay their bills. Those financial obligations still exist, regardless of whether a customer is or is not disconnected.
TEP	
1a.	N/A
1b.	N/A
1c.	N/A
1d.	No answer
1e.	<p>Utility service is a human right. Cutting off utility services for nonpayment imposes a sanction that is not only harsh but also inequitable. Research has shown that even at comparable levels of income, Black households face disconnections at disproportionately high rates, relative to white households. The consequences of disconnection are most severe for already-vulnerable populations, including the elderly and people living with health problems.</p> <p>Disconnection may not produce payment and can be counterproductive. Disconnection and reconnection can cost a utility more than it saves. In addition, the loss of electricity and heat makes it more difficult for individuals to maintain the stability and financial security needed to earn income, access public services, and pay back arrears. Moreover, cutting off service poses immediate risks to health and safety. Those risks include increased vulnerabilities to public health events such as extreme weather, and the danger to customers and neighbors when individuals resort to grills, candles, kerosene lamps, and other makeshift means of indoor cooking and providing light and heat.</p>
1f.	In order to equitably serve low-income customers and prevent the need for disconnections, TEP envisions utility service in Washington including three types of programs: (1) ongoing energy assistance based on income level for low-income customers, (2) arrearage management plans with forgiveness for low- and moderate-income customers, and (3) payment plans for all residential customers. Finally, utilities should notify customers of energy assistance programs automatically when past due balances exceed a certain threshold.
1g.	Utilities should focus on implementing effective multi-tiered bill discount programs for the next year or two. During this time, the Commission should require utilities to work with the Community Action Partnership agencies and their energy assistance advisory groups to design and implement multi-tiered bill discount programs. In addition, the Commission should require utilities offer arrearage management plans.
The Sierra Club	
1a.	N/A
1b.	N/A
1c.	N/A

Question	Summary of Comments
1d.	No answer
1e.	<p>I. Effective community outreach is at the heart of access to assistance</p> <p>Wherever possible, educating customers and helping them enroll in bill assistance and arrearage management programs is the best way to address arrearages. However, utilities face several barriers to providing effective outreach and help navigating enrollment in these programs, from lack of trust and language barriers to difficulty providing information in the times, places, and communication channels that will effectively connect with many communities. Trusted community organizations have the experience, expertise, regular contact, and foundation of trust with energy insecure customers needed to help overcome these barriers. The Commission should center input from these organizations as it addresses the questions in this docket, allow them to play a central role in efforts to enroll customers in assistance programs, and provide funding for community organizations that do this work.</p> <p>Over the course of the past two years, we have heard a lot about utilities’ efforts to communicate with the public about access to assistance programs. Utilities have made an effort to translate their materials, advertise on multiple platforms and in multiple languages, contact customers on the phone about payment plans, and more. When these initial efforts fail, utilities are left to assume that customers just don’t want to be enrolled in assistance programs. At the same time, we are still hearing from community organizations (like the NAACP Spokane, who spoke about this at a workshop earlier this year) that people who are trying to get help with their bills are consistently not able to access bill assistance. How do we understand this discrepancy?</p> <p>These stories show us that people trying to access assistance might need more or different support than is currently available. This is real data that shows that people do want support -- they just don’t know how to or can’t access it when they try. These lived experiences show us exactly where the issues in our systems are. Directing people to a website won’t work for populations who don’t use the internet. Giving someone a phone number isn’t the same as actually walking someone through the enrollment process. Waiting on a hotline for multiple hours (as described by a volunteer from the WA Immigrant Solidarity Network at an earlier workshop) is not realistic for working parents with limited time to sit on hold.</p> <p>Looking at the wide gap between outreach efforts and customers’ lived experiences can help us understand the divergence between eligibility and enrollment in assistance programs. A report by Puget Sound Sage developed before the COVID-19 pandemic found that “an alarming number of our low-income households do not receive low-income energy assistance.”¹ The report found that many eligible households do not receive bill assistance, including 28% of eligible households in Seattle (Seattle City Light service area) and 77% of eligible households outside of Seattle (Puget Sound Energy service area). The reason many of these households (50%) had not enrolled in bill assistance was that they believed they didn’t qualify, even though many of these households may actually have qualified. Additional reasons for not receiving bill assistance included not having heard of it (33% of respondents) and enrollment being too much hassle (15%). Only 3% of respondents said they would not take assistance. These results are consistent with the data reported from PSE that many more customers who paid deposits and late fees lived in highly impacted communities or areas with high concentrations of vulnerable populations (30-54.6%), than received bill assistance (3.5-12.7%). And these results suggest that lack of effective outreach is the explanation for under-enrollment in assistance programs, rather than PSE’s assertion that these customers “are not seeking the energy assistance available to them.”</p> <p>We appreciate the Commission taking steps to understand the barriers faced by</p>

Question	Summary of Comments
	<p>community members who are in crisis and at risk of disconnection. However, without lived experience, it is challenging to understand the specific barriers that some energy insecure customers face. For example, most or all people participating in this proceeding so far are employed, speak English, and regularly use the internet, which may not be the case for all customers in Washington. To help overcome this limitation, we need to base our understanding of the situation on the direct experience and knowledge of people experiencing energy insecurity and the prospect of disconnection, as well as the trusted organizations that work directly with these people. Instead of leaning heavily on our ideas about what should work, we need to see what actually is and is not working.</p> <p>To support the needs of energy burdened and energy insecure customers, we encourage the Commission and utilities to work directly with -- and provide funding for -- community organizations that work with families and individuals in need of energy assistance. These organizations, like the aforementioned NAACP Spokane, the WA Immigrant Solidarity Network, and many others, could either do direct outreach to members of their own communities or help utilities identify exactly where their communications efforts may be falling short. Moreover, based on the data collection efforts instituted in the last several years, we have identified and mapped the most indebted ZIP codes in Washington state. While broad outreach strategies may be good enough for many people and areas, different strategies may be needed to best help the most impacted areas in our state. We suggest that these ZIP codes are where we ought to focus most heavily on connecting with trusted people and organizations who already serve those communities. When we fund trusted community organizations to do outreach, we will be reaching people with resources and the support they need to actually access it.</p>
1f.	<p>II. Access to energy utility service and the role of disconnections</p> <p>Disconnecting people from access to essential utilities is a damaging, imprecise, and often ineffective response to the challenges these people face in making payments. Ending this practice would prompt utilities to focus their efforts on better solutions, including partnering with community organizations to provide the outreach needed to enroll struggling customers in bill assistance and arrearage management programs. The National Consumer Law Center’s Customer Bill of Rights concludes that safe, reliable, and affordable access to utilities is an essential human need, and that “[n]o household should be disconnected from these essential utility services based on the inability to pay.” The Center further notes that “[r]eliance on disconnections as a collections tool has the effect of punishing people for being poor, and ignores the longstanding racial and economic discrimination that have created the disparities that fuel poverty and the unaffordability of utility services.” Disconnections disproportionately harm People of Color. And there is evidence that utilities can successfully manage customer arrearages without resorting to high disconnection rates.</p> <p>Rather than focusing efforts on disconnections—and the disconnection/reconnection fees, deposits, and credit and collection impacts that can accompany them—utilities should do much more to connect struggling customers with assistance programs, starting with meaningfully engaging with community organizations as described above. By permanently eliminating disconnections for nonpayment and associated charges, the Commission would provide utilities with a strong incentive to sincerely pursue these fairer, less harmful, more effective alternative approaches. While this will require a significant near-term effort to develop and implement these alternatives, it will better align utilities’ incentives with the public interest and ultimately lead to better long-term solutions.</p>
1g.	<p>III. Recommendations</p> <p>Based on the observations above, we recommend that the utilities, with Commission</p>

Question	Summary of Comments
	<p>support:</p> <ul style="list-style-type: none"> ● Continue to develop and expand assistance programs that provide alternatives to disconnections, including low-income weatherization and efficiency programs (which can reduce bills and help prevent arrearages), bill assistance programs, percentage of income payment programs, and arrearage management plans. ● Lower barriers to enrollment in assistance programs, through approaches like auto-enrollment in arrearage management programs for people who are in arrears or who receive other forms of assistance, and self-attestation of income (instead of requiring extensive documentation that people might not have access to). ● Partner with, support, and fund community organizations to identify barriers to effective outreach and help customers access assistance. ● Permanently eliminate disconnections for nonpayment and the connection/reconnection fees, deposits, and credit and collection impacts that can accompany them, so that the Commission, utilities, and partner organizations can focus on the more effective responses above.

2. *Should additional information be provided to customers prior to disconnection for non-payment?*
- a. *What, if any, information regarding assistance is currently being provided and what information should be provided?*
- b. *What, if any, information regarding customer rights and protections should be provided?*
- c. *Should disconnection for non-payment notices include Commission contact information?*

Question	Summary of Comments		
Avista			
2.	Avista believes the information contained within its current noticing process is sufficient to provide customers with ample time and access to resources prior to becoming eligible for disconnection due to non-payment.		
2a.	<p>Both the Past Due Notice and the Final Notice issued to customers prior to disconnection contain information regarding payment arrangements and bill assistance. The Company's assistance website is provided, in addition to its customer service phone number and a brief listing of the potential energy assistance available. Additionally, information regarding postponement of disconnection due to medical emergencies is provided. Below are examples of the verbiage currently contained on these notices.</p> <p>We want to work with you on a plan to keep your services at [redacted] connected. You may be eligible for payment arrangements or bill assistance. For help with your past due balance, please contact us to discuss options. You can also visit us at www.myavista.com/assistance.</p> <p>You can apply for financial assistance to help pay your bill through your local community action agency. For information on your local agency please visit www.myavista.com/assistance or call (800) 227-9187. Programs include:</p> <ul style="list-style-type: none"> ● Low Income Home Energy Assistance Program (LIHEAP) ● Avista's Low Income Rate Assistance Program (LIRAP) ● Project Share <p>We need to hear from you. Please call us today (800) 227-9187.</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>Additional Options</p> <hr/> <p>Bill Assistance Looking for energy bill assistance? Visit www.myavista.com/assistance to find your local community agency as you may be eligible for assistance towards your utility bill.</p> </td> <td style="width: 50%; vertical-align: top;"> <p>Medical Emergency</p> <hr/> <p>In Washington: If you have a medical emergency, we will postpone termination of service, upon notification for a grace period of five business days, during which time a written certification from a qualified medical professional must be received.</p> </td> </tr> </table> <p>Customers with internet access can also visit the Company's assistance site (www.myavista.com/assistance) at any time during the collections process for information regarding financial resources for Washington residents, self-service and payment options,</p>	<p>Additional Options</p> <hr/> <p>Bill Assistance Looking for energy bill assistance? Visit www.myavista.com/assistance to find your local community agency as you may be eligible for assistance towards your utility bill.</p>	<p>Medical Emergency</p> <hr/> <p>In Washington: If you have a medical emergency, we will postpone termination of service, upon notification for a grace period of five business days, during which time a written certification from a qualified medical professional must be received.</p>
<p>Additional Options</p> <hr/> <p>Bill Assistance Looking for energy bill assistance? Visit www.myavista.com/assistance to find your local community agency as you may be eligible for assistance towards your utility bill.</p>	<p>Medical Emergency</p> <hr/> <p>In Washington: If you have a medical emergency, we will postpone termination of service, upon notification for a grace period of five business days, during which time a written certification from a qualified medical professional must be received.</p>		

Question	Summary of Comments
	payment arrangements, weatherization information, an overview of programs and energy assistance options available, and a link to locate their local Community Action Agency (CAA). Customers who contact Avista via telephone are also provided with these resources, as well as referral to the Company’s Customer Assistance Referral & Evaluation Services (CARES) department if applicable.
2b.	The Company is unaware of any additional information that should be provided regarding customer rights and protections, as the medical emergency information noted in (a.) above and complaints/disputes noted in (c.) below is provided on all notices, in addition to the information provided to customers in alignment with WACs 480-100-103(3) and (4).
2c.	Avista includes Commission contact information on all Past Due and Final Notices.
Cascade	
2.	Cascade makes extensive efforts to contact customers before disconnecting service and only disconnect as a last resort, typically when the customer is not responding to any contact attempts, not seeking assistance, or consistently not following through on payment arrangement commitments. In addition to the Energy Assistance information referenced in the response to question 2a and Rights and Responsibilities information referenced in the response to question 2b, the following notifications and/or information is provided to customers prior to disconnection: Automated Call advising to contact Cascade, Disconnect of Service Notice, Urgent Notice, Manual Outbound Call, and site visit by Cascade Service Mechanic. The Disconnect of Service and Urgent notices both contain Energy Assistance information and Payment Options. Cascade is not aware of any additional information that needs to be provided to customers prior to disconnection for non-payment.
2a.	<p>Cascade Natural Gas provides detailed assistance information, including all forms of available assistance and where/how to apply, using the following methods:</p> <ul style="list-style-type: none"> • Company website • Personalized letters to customers • Customer emails • Phone contact from Customer Service and Credit & Collection Representatives • Reminder letters, Past Due and Urgent Notices • Door Tags • Brochures and signage at CAAs • Google Ads • Paid and organic social media posts • Radio advertising • Streaming audio advertising • Display ads • Bill inserts • Bill onserts
2b.	A Rights and Responsibilities insert is provided once per year and in the new customer packet. A list of rights and responsibilities also appears on the company website.
2c.	Commission contact information is already included on Cascade’s disconnect notices. Cascade is not opposed to adding Commission contact information to non-pay notices. All stakeholders will need to keep in mind that, if the information is placed on the front of notices, it could result in reduction of font size of other important information or removal of other important information completely.
NW Natural	
2.	No. NW Natural does not believe additional information should or needs to be provided to its customers prior to disconnection for non-payment, based on all of the information described below that the Company already provides. NW Natural customers may receive, in

	<p>additional to the bill itself, up to six separate written communications and two contacts by phone prior to disconnection for non-payment. That also includes two written past-due notices with fairly detailed information on options, protections, contact information for assistance and contact information for the WUTC if the customer wishes to appeal a notice.</p>
2a.	<p>Past-due customers are provided a Past Due Notice and an Urgent Final Notice prior to disconnection that urges them to make a payment or contact NW Natural about a Time Payment Agreement (TPA) or energy assistance. The notices for residential customers contain the “Important Notice for Residential Customers” insert, intended to address potential language barriers that might impede a customer’s ability to make appropriate arrangements. The insert informs the customer that if they do not have a translator at home they can contact NW Natural for a translator in the language of their choice. Information on customer’s rights and responsibilities are offered in those languages as well. energy assistance brochures are sent with the Past Due Notice and the Urgent Final Notice. In most cases, if the notices expire and the account is still past due, residential customers receive a “call-ahead” three days before a disconnection is to be scheduled and both residential and commercial customers receive a “call-ahead” the business day prior to a disconnection order being sent to a field technician for completion. Call-aheads are intended to provide additional opportunities to prompt a customer to arrange a TPA, apply for energy assistance, if necessary, or encourage them to make a payment if they were simply unaware of their past-due bill. Both notice types include detailed information about payment method alternatives. Any of these options result in cancellation of a pending disconnection order. Customers who have made payment arrangements via the Web, Interactive Voice Response System, or a Customer Service Representative (CSR) in the prior five days, have informed us they prefer not to be contacted, have requested a security password on their gas account, or do not have a valid phone number, will not receive courtesy call-aheads prior to disconnection orders being scheduled.</p>
2b.	<p>Customers whose health will be endangered due to disconnection for non-payment should be and are provided protections and informed of their availability. The current notices include Medical Certificate language and all customers who have active Medical Certificates or are pursuing the approval or renewal process are exempt from receiving regular notices and disconnection orders. Their notices are produced via a “special handling” process and are reviewed before being sent to the customer. A disconnection order is never scheduled or completed for a Medical Certificate customer without Commission approval.</p> <p>If a customer has a pending disconnection order and mentions a potentially qualifying medical condition to a CSR or to a technician while on-site, the order is cancelled to allow five business days for the Medical Certificate process (with the customer’s agreement). A dedicated Medical Certificate Team is available to medical professionals and customers to facilitate the process and answer questions. If the customer has been shut off for non-payment, service is restored that day and time is given for the Medical Certificate process to be completed.</p> <p>Likewise, low-income customers should be and are informed that energy assistance is an option for them and encouraged to call their local agency, which is why this language is in the text of the notices and we enclose energy assistance brochures with each type of notice we send to a customer. If a customer mentions an appointment has been scheduled with an agency, the credit action is stopped to allow for the application process as a courtesy. This provides an opportunity for the customer to utilize the programs for which they are qualified. If they do not qualify for energy assistance, we still offer a TPA.</p>
2c.	<p>Yes. Currently, the Commission’s toll-free phone number and e-mail, website, and mailing addresses are included in each notice type in the section that explains how a customer can appeal a notice</p>

PacifiCorp	
2a.	PacifiCorp’s past due notices and final notice letters provide a list of local community action agencies to contact for bill assistance and to determine eligibility for winter payment plan. The final field notice, which is the last collection notice before service disconnection, also provides a list of community action agencies and Project HELP (nonprofit program) contact information. The final field notice also includes a LIHEAP income guideline chart so customers can determine if they may qualify before reaching out to agencies.
2b.	PacifiCorp provides a Rights and Responsibilities insert to all new customers and also provides it to all customers once per year. Additionally, PacifiCorp’s past due notices and final notice letters contain language on the following: <u>Medical Emergencies</u> —customers are encouraged to contact the Company to advise of any potential medical condition in the home. <u>Payment Plans</u> —customers are encouraged to speak to the Company about setting up payment plan arrangements for their outstanding balance, including the Winter Payment Plan to help avoid termination from November 15 through March 15. <u>Energy Assistance Agency Information</u> —the agencies and their phone numbers are included on the notices. <u>Washington Commission contact information</u> —The Washington Utilities and Transportation Commission’s toll-free phone number and mailing address are included on the notices to allow customers to appeal the disconnect.
2c.	Yes, as discussed above, the Company’s notices provide Commission contact information in the form of the Commission’s toll-free phone number and mailing address.
PSE	
2a.	PSE provides this information in many steps of the dunning process prior to disconnection. We conduct outreach and, if we are successful in reaching the customer, we discuss all assistance programs available. Information is also available on PSE.com, on PSE’s interactive voice response system (IVR), and on its Urgent and Final notices that are sent to customers prior to disconnection. Customers can use self-serve options on the website, mobile app, or through the IVR as well as speaking to an agent if that is preferred. If the customer engages with PSE they will also be informed about the company’s payment arrangement and assistance programs.
2b.	PSE would support providing the link to the WUTC Consumer protection page (https://www.atg.wa.gov/consumer-help) or whatever is more appropriate.
2c.	PSE supports the inclusion of Commission contact information on Urgent and Final notices. Since the onset of the Pandemic and Disconnect Moratorium, PSE is including Commission contact information on both the Urgent and Final notices, as follows: <i>Puget Sound Energy’s services in Washington State are regulated by the Utilities and Transportation Commission (UTC). The Washington Utilities and Transportation Commission may be reaching out to you by way of email, phone or a mailed letter to verify account information. You may also contact the UTC by dialing 1-888-333-9882, via email at Consumer@utc.wa.gov, or by mail at P.O. Box 47250, Olympia, WA 98504.</i>
Public Counsel	
2a.	<i>See below</i>
2b.	Utilities should have an obligation to provide accurate and clear information about all options available to customers if they are facing a potential disconnection a Utility Customer Bill of Rights would provide vital information to all utility customers and establish principles to keep customers connected to utility service. Principals identified by the National Consumer Law Center include:

	<ul style="list-style-type: none"> • Recognition that utilities are essential services • Eliminating disconnection for low-income households to provide broad, universal access to service • Elimination of fees, penalties, and deposits that disproportionately impact low-income households <p>The utility bill of rights is something that should be provided to customers.</p>
2c.	Yes, notices should also provide context of the Commission’s role. Access to the Commission may give customers who fear their utility another way to resolve their issue.
TEP	
2a.	<p>Lack of awareness of energy assistance and bill management programs remains a significant barrier to energy security for many low-income customers. Accordingly, the Commission should direct utilities to engage in outreach with customers who are in jeopardy of losing service or falling behind on their utility bills, as well as through community-based organizations. More proactive communications between utilities, community-based organizations, and customers increases the likelihood that customers will take advantage of the suite of programs that exist to reduce energy costs and manage bills. Principals identified by the National Consumer Law Center include:</p> <ul style="list-style-type: none"> • Recognition that utilities are essential services • Eliminating disconnection for low-income households to provide broad, universal access to service • Elimination of fees, penalties, and deposits that disproportionately impact low-income households <p>The utility bill of rights is something that should be provided to customers.</p>
2b.	<p>The rules should explicitly state that the notice should include a description of the customer’s rights and options under different energy assistance programs for low-income customers and payment plans for all residential customers.</p> <p>The Commission should establish an arrearage threshold to identify customers at risk of accruing large arrearages. Utilities should then contact customers whose arrears exceed the threshold to offer assistance before they fall further behind on their bills. The Commission should work with stakeholders in this proceeding to determine the appropriate threshold. TEP suggests that the threshold include both a dollar amount and minimum amount of time for arrears (e.g., 90 days of an outstanding balance). Utilities should then automatically notify any customer whose arrears exceed the thresholds via traditional and electronic mail to provide information on energy and payment assistance. In addition, utilities should describe available assistance programs in any phone calls or chats with customers whose arrearages exceed the threshold</p>
2c.	Disconnect notices should include Commission contact information.

3. *What percent of customers are billed through e-billing or paperless billing?*
- a. *What percent of customers who are signed up for e-billing or paperless billing are also members of highly impacted communities and/or vulnerable populations?*
- b. *On average, what percent of customers who receive their tariff change notices electronically access their notice?*

Question	Summary of Comments
Avista	
3.	Of Avista’s 265,916 current customer accounts in Washington, 83,873 of these accounts are enrolled in paperless billing; this equates to approximately 31.5% of accounts.

Question	Summary of Comments
3a.	Of the 83,873 customers enrolled in paperless billing, approximately 32,265 are located in an area designated as Highly Impacted Communities (HIC) and/or Vulnerable Populations (VP or, collectively, “Named Community”); this equates to approximately 38.47% of paperless billing customers being members of a Named Community. However, some of the 51,608 customers identified as not being located in a Named Community are natural gas-only customers. Due to the current applicability of the term Named Community within CETA (i.e., CETA legislation is relevant to electric services, therefore the definition of Named Community refers to Census Tracts within the Washington residential electric service territory), Avista has not evaluated its natural gas service territory for CETA purposes and has therefore not examined geographic locations within its gas-only territory for the prevalence of Named Communities.
3b.	When issuing a tariff change notice electronically, Avista provides these notices in two forms: 1) posting of the notice, and associated tariff filing, on its web site and 2) sending the notice as a bill insert via mail, either paper copy or e-mail depending on the customer’s indicated communication preference. Regarding this first option, while the Company is able to determine the number of views each electronically-posted tariff change notice has received, the number of tariff change notices issued for Washington in a given year—coupled with the fact that this data is collected in aggregate form rather than correlated to a specific customer’s account—does not allow the Company to accurately determine what percent of customers who receive these notices electronically actually access the notices. For customers that receive paperless billing, and therefore electronic bill inserts, the Company’s current billing software does not have the ability to track opened bills. Avista expects to have this functionality in the near future.
<i>Cascade</i>	
3.	38% of Washington Cascade customers are on ebills.
3a.	Cascade does not collect demographic or income information; therefore, the company is not able to answer this question at this time.
3b.	0.17% of customers over the past 12 months (August 08, 2021 – August 08, 2022) who receive their tariff change notices electronically access their notice.
<i>NW Natural</i>	
3.	Percentages are Residential 36.7% and Non-Residential 30.7%.
3a.	NW Natural does not have the information requested.
3b.	NW Natural does not have the information requested. All electronic/paperless bills include links to the current tariff change notices and bill inserts, in addition to all tariff change notices being published electronically at nwnatural.com
<i>PacifiCorp</i>	
3.	<i>See below responses for response to 3.</i>
3a.	Roughly 43,000 or 33% of Washington customers are on paperless billing. Approximately one out of six Schedule 17 low-income customers are on paperless billing.
3b.	PacifiCorp does not currently track data for customers accessing electronic notices.
<i>PSE</i>	
3.	<i>Forty-five percent of current active PSE customers are enrolled in paperless billing.</i>
3a.	Thirty-nine percent of active customers who are enrolled in paperless billing are members of either a highly impacted community, a vulnerable population, or both.
3b.	On average, 82% of customers who receive their notices electronically access their notice. We are unable to track tariff change notices specifically.
<i>Public Counsel</i>	
3.	N/A

3a.	N/A
3b.	N/A
TEP	
3.	N/A
3a.	N/A
3b.	N/A

4. How does your company define “low-income”? How should “low-income” be defined?

Question	Summary of Comments
Avista	
4.	Avista defines low-income in accordance with WAC 480-109-060(22), which provides that low-income “means household incomes that do not exceed the higher of eighty percent of area median income or two hundred percent of federal poverty level, adjusted for household size.” The Company believes this definition to be sufficient.
Cascade	
4.	Cascade defines low-income as any customer who has received any type of Energy Assistance in the previous 12 months. Energy Assistance is defined as LIHEAP, WEA, Winter Help, or Big Heart Grants. In addition to this definition, Cascade believes low-income should be defined as any resident receiving any type of Federal or State needs-based assistance. However, the company currently only receives information on LIHEAP recipients and does not receive information on customers who receive any other type of Federal or State assistance. A process would need to be established for the company to receive that information in order to expand the definition from what Cascade uses today.
NW Natural	
4.	For purposes of various data responses provided throughout the COVID-19 pandemic in docket U-200281 and related dockets, NW Natural has defined low-income customers as those having received energy assistance within the past 24 months. Currently, the thresholds to qualify for energy assistance in Washington are 150% of federal poverty level (FPL) for the federal LIHEAP program and 200% of FPL for NW Natural’s Gas Residential Energy Assistance Tariff (GREAT) program. NW Natural notes that for purposes of electric utility programs developed pursuant HB 5295, low-income customers are defined using the provision in the Clean Energy Transformation Act (CETA) at RCW 19.405.020(25), which is the higher of 80% of area median income or 200% of FPL. Low income should be defined in a manner that will be impactful for customers in need and allows for efficient and easy administration across all the requirements of utilities in the programs they administer and the programs, such as the Climate Commitment Act, to which they are subject.
PacifiCorp	
4.	PacifiCorp defines low-income customers as customers who have received an energy assistance benefit and/or bill discount under PacifiCorp’s Low Income Bill Assistance Program (Schedule 17). PacifiCorp’s Low-Income Bill Assistance Program (LIBA) and Low-Income Weatherization Program use an income guideline consistent with RCW19.405.020 (25).
PSE	
4.	PSE defines low-income as at or below 80% Area Median Income or 200% Federal Poverty Level, whichever is greater. This is an appropriate definition of low-income because it aligns with the low-income definition in RCW 19.405.020(25), which creates consistency for customers. Also, using Area Median Income in addition to Federal Poverty Level better reflects the actual composition of the state than using Federal Poverty Level alone.

4.	<i>No response.</i>
Public Counsel	
4.	The Clean Energy Transformation Act defines low-income qualification as the greater of 200 percent of the federal poverty level (FPL) and 80 percent of area median income. ⁷ Although this statute only applies to electric utilities, there is good reason to establish consistency across all regulated utilities. Defining low-income in this way helps to ensure that the definition accounts for local differences and demographic characteristics
TEP	
4.	N/A

5. How does your company assess the impact of its disconnection practices in areas defined as highly impacted communities and vulnerable populations?

Question	Summary of Comments
Avista	
5.	Avista has not historically assessed this information prior to the implementation of CETA and is now in the beginning stages of tracking and assessing the impacts of credit-related disconnections in areas defined as HIC and VP. With the approval of the Company’s Clean Energy Implementation Plan (CEIP) ⁴ on June 16th, 2022, Avista will be tracking disconnections for non-payment more granularly. As one of its Energy Availability Customer Benefit Indicator (CBI) metrics, tracking will include the number and percentage of residential electric disconnections for nonpayment by month, measured by location and demographic area to include VPs and HICs. This metric is also proposed as a Performance Based Ratemaking Metric (Metric No. 9) within the Settlement Stipulation of the Company’s 2022 General Rate Case. ⁵ With the collection of this data, Avista will be able to better assess the impacts of its disconnection practices in these areas.
Cascade	
5.	Currently, Cascade does not assess the impact of its disconnection practices in areas defined as highly impacted communities and vulnerable populations; however, these types of issues should be brought up and addressed within general rate cases. In accordance with Order 05 in Docket UG-200568, Cascade has prepared a disconnection reduction plan with the objective of describing Cascade’s three broad-based strategies to reduce disconnections. Cascade’s first strategy revolves around payment options, arrangements, and alerts. The second strategy centers around preventative disconnection and collection process. The last strategy revolves around energy assistance, arrearage management, and energy burden discounts. In addition, the Low-Income Advisory Group was established per the 2016 settlement agreement in Order 04 in Docket UG-152286. This group meets at least twice per year and includes representatives of our Community Action agency partners, Commission Staff, The Energy Project, Public Counsel, and Cascade representatives. Meetings are conducted with both agenda items and an open forum for general discussion offered by any group member. Cascade has found these meetings productive and helpful to ensure all members are heard. Regular topics include program performance, ongoing concerns, evaluating the program’s budget, and exploring alternative program designs. The settlement agreement established the following four program goals to guide decisions in all aspects of program design: a) Keeping customers connected to energy service.

⁴ Docket UE-210628

⁵ Dockets UE-220053 and UG-220054

	<p>b) Providing assistance to more customers than are currently served. c) Lowering the energy burden of program participants. d) Collecting data necessary to assess program effectiveness and to inform ongoing policy discussions.</p> <p>In 2021, Cascade consulted with Avista Utilities regarding a Community-Based Organization (CBO) pilot program established as a COVID-19 pandemic response for low-income bill payment assistance. Additional information was obtained from Avista’s Community Action partner who utilized the program for clients. Using both resources, Cascade created a CBO program which was presented to the Low-Income Advisory Group in December 2021. With the feedback from group members, the Advisory Group will continue to develop and implement a CBO program suitable for all parties as soon as practicable. These CBOs could include entities that serve marginalized communities, including but not limited to rural, immigrant, tribal, or people of color. Such organizations will focus on community-based outreach to target the hardest-to-reach customers with disabilities, language barriers, and limited access to communications. Cascade has made independent efforts to establish new, informal partnerships with CBOs throughout the service territory. These efforts have been productive and will continue to share and promote the energy assistance options that are available to our customers who are their clients.</p>
NW Natural	
5.	<p>The Company does not currently have the data needed to perform the requested assessment. The terms “highly impacted communities” and “vulnerable populations” as defined in the Clean Energy Transformation Act (CETA) at RCW 19.405, were part of legislation that pertained to electric utilities only. The Washington Department of Health’s cumulative impact analysis that defines the highly impacted communities included only electric utilities. NW Natural is beginning to work to identify the highly impacted communities in its service territory using the Department of Health census tract data and to determine how this data may be used. The Company will participate in the upcoming workshop and reserves the right to provide additional comments on this topic after the workshop and after reviewing the written comments submitted.</p>
PacifiCorp	
5.	<p>PacifiCorp does not specifically assess the impact of disconnection practices, but we are engaged with and communicate with our local community action agencies. In response to the COVID-19 pandemic, PacifiCorp implemented a direct customer information referral to the energy assistance agencies to help facilitate the customer energy assistance application process. The agencies found the referrals to be helpful in getting customers signed for assistance and company has continued the referral program.</p>
PSE	
5.	<p>PSE treats all customers in the disconnection process equally and as such has not assessed impacts in areas defined as highly impacted communities or vulnerable populations.</p>
Public Counsel	
5.	N/A
TEP	
5.	N/A

6. What information does your company use to determine which customers should be disconnected? Does your company use any of the following information to determine if a customer should be disconnected?

- a. Credit Scores (either external or internal)
- b. A dollar amount threshold
- c. A delinquency threshold (for example 30 days, 60 days, 90 days, or any other interval)

d. Is there any other account information factored in to determine if a customer should be disconnected, and if so, please identify that information?

Question	Summary of Comments																		
Avista																			
6a.	<p>Yes, Avista uses (a) internal credit codes, (b) dollar amount and (c) delinquency thresholds to determine which customers are eligible for disconnection. Avista’s collections process, no matter the credit code, begins when a customer’s unpaid bill becomes past due (2 days past the bill due date) and the arrears is beyond the thresholds per credit code as outlined in the table below. Thresholds vary depending on the time of year to accommodate seasonal highs and lows. The Company does not use any additional account information to determine if a customer should be disconnected.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="3">Typical Season Balance Thresholds</th> </tr> <tr> <th>Credit Code</th> <th>Winter Thresholds</th> <th>Summer Thresholds</th> </tr> </thead> <tbody> <tr> <td>0</td> <td>\$250</td> <td>\$125</td> </tr> <tr> <td>1</td> <td>\$300</td> <td>\$250</td> </tr> <tr> <td>2</td> <td>\$350</td> <td>\$250</td> </tr> <tr> <td>3</td> <td>\$1,000</td> <td>\$1,000</td> </tr> </tbody> </table>	Typical Season Balance Thresholds			Credit Code	Winter Thresholds	Summer Thresholds	0	\$250	\$125	1	\$300	\$250	2	\$350	\$250	3	\$1,000	\$1,000
Typical Season Balance Thresholds																			
Credit Code	Winter Thresholds	Summer Thresholds																	
0	\$250	\$125																	
1	\$300	\$250																	
2	\$350	\$250																	
3	\$1,000	\$1,000																	
6b.	<i>See above table response for response to 6b.</i>																		
6c.	<i>See above table response for response to 6c.</i>																		
6d.	<i>See above table response for response to 6d.</i>																		
Cascade																			
6a.	No, Cascade does not use external credit scores or assign a permanent internal credit score that is used in collections. However, once an account meets the debt threshold described in 6b and 6c, a temporary calculation is made using the information in 6d (calculation is not stored) that determines which of Cascade’s three collection paths the account will take during that bill/collection cycle. Not all accounts that meet the debt criteria in 6a and 6b will enter a collection path for disconnection.																		
6b.	Yes, a dollar amount threshold, in combination with the delinquency threshold noted below, is a minimum criterion to start one of Cascade’s three collection paths. A Residential account must owe at least \$50.00 before the account is eligible for collections.																		
6c.	Yes, in combination with the dollar criteria of \$50.00, the minimum debt must be at least 35 days old before the account is eligible for collections.																		
6d.	<p>Yes. Cascade also considers the following information:</p> <ul style="list-style-type: none"> • Amount of arrears • Number of days past due • Days since last payment • Last payment amount • Number of days in service • NSF History 																		
NW Natural																			
6.	NW Natural determines if an account is eligible for disconnection by following our collection process, which includes sending a reminder notice, a 5-day notice and completing a call-ahead. In combination with our collection process, we use a dollar threshold, which is \$150. There are exceptions that would prevent a customer that meets these requirements from being disconnected and those include, but are not limited to, being in the process of receiving energy assistance and customers with medical certificates.																		
6a.	<i>See above response for response to 6a.</i>																		
6b.	<i>See above response for response to 6b.</i>																		

6c.	<i>See above response for response to 6c.</i>
6d.	<i>See above response for response to 6d.</i>
PacifiCorp	
6a.	PacifiCorp does not track, collect, or use credit scores.
6b.	PacifiCorp's threshold is >\$50.
6c.	PacifiCorp uses a threshold of >60 days
6d.	PacifiCorp also uses the thresholds of >60 days without payment and >2 cut orders in past 12 months. Under the current disconnection review process implemented by the Washington Utilities and Transportation Commission Staff, we are not currently utilizing c and d.
PSE	
6a.	PSE utilizes a propensity to pay score, which is derived and based on customer payment behaviors only with PSE and is based on whether they pay on time, late, or never. This score is used to determine if the customer will enter the dunning process.
6b.	PSE does use a dollar amount threshold/limit which is based on the customer's arrearage balance. If the customer meets the threshold, they enter the dunning process, which may ultimately lead to disconnection if the customer does not act on their account or contact the company for payment arrangements or assistance. Prior to the pandemic, PSE's set thresholds were \$70 for residential accounts and \$250 for Commercial accounts. During the pandemic PSE increased the threshold limit to \$1000 for all customers. As collection resummptions began post the disconnect moratorium, PSE started with our highest past due balances. PSE does plan to decrease the balance in a staggered approach over the next several months and may determine different threshold amounts versus those set pre-pandemic.
6c.	Disconnection is determined based on the customer's propensity to pay internal score and their arrearage balance. PSE does not use a delinquency threshold; customers are sent an invoice which has a pay by date, if the customer becomes 1 day past due from the pay by date we then leverage (a) and (b) above and if the customer meets the eligibility criteria, they then enter our dunning process.
6d.	If the customer is acting on their account by way of payment, seeking assistance, or setting up a payment plan (calling PSE, or Self-serving), they are removed from our dunning process and are no longer considered for disconnection.
Public Counsel	
6a.	N/A
6b.	N/A
6c.	N/A
6d.	N/A
TEP	
6a.	The Energy Project understands that several, if not all, of the IOUs consider a customer's prior obligation as a factor in determining a credit or risk score. Customers with lower utility credit scores are at greater risk of disconnection, because utilities are more likely to send such customers to a dunning or collections process. Consideration of prior obligations in utility credit scores, which in turn informs utility disconnection practices, is yet another example of the inequities inherent in current disconnection policies and practices. It would be helpful if the IOUs clearly identify all factors considered as part of their internal or external credit rating processes.
6b.	N/A
6c.	N/A
6d.	N/A

Deposits

7. Does your company offer the following features on its website or online customer portal?
- Self-enrollment for a customer's preferred payment arrangements
 - Changing a customer's preferred payment due date to parallel receipt of income
 - Bill Assistance information (a link or contact information to their local community action council or other information specific to that customer)
 - The ability for a customer to select their preferred language for correspondence or communications (if other than English)

Question	Summary of Comments
Avista	
7.	<i>See responses below for response to 7.</i>
7a.	Yes, Avista customers have online access to self-enrollment for their preferred payment arrangements.
7b.	No, a customer is unable to change their preferred payment date online, however, the Company's CSRs are able to change a customer's preferred payment date to parallel receipt of income, as long as the proposed date does not conflict with the customer's future billing cycles.
7c.	Yes, the Company provides a CAA locator tool on its website that allows customers to search for their nearest CAA by zip code. Once located, the Agency's contact information, and a direct link to their website if available, is provided.
7d.	No, customers are not able to select their preferred language via Avista's website.
Cascade	
7.	<i>See responses below for response to 7.</i>
7a.	Somewhat. Customers may submit a preferred payment plan through an automated chat session. However, the payment arrangements are subject to review and approval upon submission
7b.	Not offered at the moment, still working on system upgrades before such a feature can be accessible.
7c.	Yes, www.cngc.com contains detailed assistance information, including contact information for all area CAAs.
7d.	Cascade's website is translatable to the following languages: <ul style="list-style-type: none"> • Chinese • English • Indonesian • Japanese • Korean • Russian • Spanish • Ukrainian • Vietnamese
NW Natural	
7.	<i>See responses below for response to 7.</i>
7a.	Yes. Customers can request an extension on a past-due bill, set up the Equal Pay Plan (or budget plan), or review energy assistance information on our Payment Assistance page. To set up a Time Payment Agreement, customers need to contact our Customer Contact Center (CCC) to speak with a CSR.

7b.	No. We do not offer preferred due date selections on our website at this time. To select a preferred due date, customers need to contact our CCC to speak with a CSR.
7c.	Yes. We have a Payment Assistance page that lists all the agencies that take energy assistance applications by geographical location, including their contact information. The list includes links to some of the agency websites and some of the agencies offer an online application as well.
7d.	No. To request communications in languages other than English, customers need to contact our CCC to speak with a CSR. However, we currently provide communications in English with the exception of several select brochures and inserts that were designed in multiple languages, such as our recent brochure that included information about our COVID-19 Assistance Program (CAP) in Washington, along with other options for customers with a past-due balance. We have provided certain documents in languages other than English upon request, but these have been rare.
PacifiCorp	
7.	<i>See responses below for response to 7.</i>
7a.	Yes, this self-service feature is offered on our customer facing website.
7b.	Yes, this self-service feature is offered on our customer facing website
7c.	Yes, PacifiCorp’s website provides bill payment assistance information, which includes links to local LIHEAP (Low Income Home Energy Assistance Program) community action agencies by county and contact information for other energy assistance resources.
7d.	Yes. English and Spanish are offered
PSE	
7.	<i>See responses below for response to 7.</i>
7a.	PSE offers customers the ability to self-enroll in the customer’s preferred payment arrangement on its website (https://www.pse.com/account-and-billing/Payment-Assistance/payment-arrangement), IVR, and mobile app. Customers can select their own schedule for payments up to 18 months.
7b.	Yes, PSE offers customers the ability to change their payment date to a preferred payment date that aligns with their receipt of income.
7c.	Customers can find information on bill assistance programs, including contact information for community agencies that administer those programs, on PSE.com. PSE.com also includes the income guidelines for PSE HELP and weatherization programs, instructions on how to apply for those programs, and the ability for a customer to create a PSE HELP application.
7d.	PSE does not currently have this feature. We are upgrading our website later this year, offering our customers the ability to view the entire website in seven languages - English, Chinese, Hindi, Korean, Russian, Spanish and Vietnamese.
Public Counsel	
7.	N/A
7a.	N/A
7b.	N/A
7c.	N/A
7d.	N/A
TEP	
7.	
7a.	N/A
7b.	N/A
7c.	N/A

7d.	N/A
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8. TEP raises concerns that the 60-day renewal requirement in the Commission’s rule governing medical emergencies may be difficult for customers.

a. What percent of medical emergencies are not renewed for a second 60-day period?

b. Could medical emergencies remain in effect for the stated duration of the condition, rather than having a set expiration?

c. Should a 60-day renewal be required for customers experiencing chronic conditions?

Question	Summary of Comments
Avista	
8a.	Based off of data from 2018 and 2019, approximately 85% of emergency medical certificates (EMCs) are not renewed.
8b.	While Avista is open to extending the amount of time an EMC may be in place before expiring, the Company believes that a set duration would offer consistency for all customers, rather than some customers receiving more protections than others based on the severity of their condition. Perhaps setting one duration for temporary conditions and another for chronic conditions might be most appropriate in considering equity without having an abundance of variability in the renewal timeframes for EMCs. However, if such changes are made to extend the duration for how long an EMC remains in effect, considerations must also be made regarding the required customer payment behavior during that time. WAC 480-100-128(8)(c) currently states that a customer must pay a minimum of ten (10) percent of the delinquent balance and make arrangements to pay the remaining balance within one hundred twenty (120) days. If the required certificate renewal timeframe is extended beyond the 120 days allowed for payment of the delinquent balance, the Commission must then consider the appropriate course for a customer that does not make such payment within 120 days: since they are protected by an EMC, the Company is not authorized to start the collections process, so is the customer instead subject to the previous cycle of paying another 10% of their balance and setting 120-day arrangements—and so on, until their EMC expires? Such consequences and scenarios should be considered when reviewing these rules.
8c.	As stated in its response to (a) above, Avista is amenable to extending the timeframe required before renewal of an EMC. However, chronic conditions should require a set expiration date or specific requirements pertaining to customer payment behavior, as providing a perpetual medical certificate may result in unintended consequences when it comes to associated protections from disconnection or collections activity.
Cascade	
8a.	2019 – 81% did not renew 2018 – 605 did not renew
8b.	The current rule states that medical emergencies will remain in effect for the stated duration of the condition but no longer than 60 days. Cascade feels that there must be a point of renewal, as well as a limit on renewal. Medical conditions and household members can change quickly, and Cascade would not want to risk storing sensitive information that may no longer be valid. Cascade feels it is more appropriate to let sensitive customer information, that is only pertinent to the utility based on the status of a customer’s account, expire, and renew with verification if that condition continues to exist.
8c.	Cascade feels that there must be a point of renewal; either at 60 days or at another reasonable point in time. This renewal must exist because medical conditions and household members may change. Also, if a medical condition is chronic and the household is in a financially difficult position causing the threat of disconnection, there are resources that will provide payment assistance and prevent long-term disconnection.

NW Natural	
8a.	Using 2018 and 2019 as examples of past patterns of customer behavior, 100% of the medical certificates in Washington were not renewed for a second 60-day period.
8b.	<p>It is our strong recommendation that medical certificates do not remain in effect for the stated duration of the condition, but instead have a set expiration period. Expiration periods do not preclude a customer or a member of their household with a significant medical condition from obtaining a medical certificate if they feel it is necessary and do not prevent them from renewing the medical certificate as needed. Some medical conditions are chronic or have uncertain outcomes. An expiration date prompts the customer and their medical professional to review the customer's circumstances periodically to determine if a medical certificate is still necessary and if the terms are still valid. For instance, the medical condition may have become more serious or now appear to be chronic. Conversely, the customer or their family member may have recovered or moved to another location and the medical certificate is no longer necessary for the household. An expiration date prompts the utility to review and update the customer's account.</p> <p>NW Natural does, however, recommend that the 60-day medical certificate period be reconsidered. The short duration of the current medical certificate period could discourage customers from pursuing or renewing medical certificates, even if a serious medical condition is present. The process of obtaining evaluation and the completed medical certificate documentation back from a medical professional may take a substantial portion of the current medical certificate period in some cases. NW Natural recommends the 60-day medical certificate period be increased to a 12-month period for chronic conditions and a 6-month period for non-chronic conditions (unless a 12-month period is specifically recommended by a medical professional for a non-chronic condition).</p>
8c.	<i>See above response for response to 8c.</i>
PacifiCorp	
8a.	During calendar year 2018, 33 customers out of 350 recertified on time
8b.	PacifiCorp would support renewal for the lesser of the length of the condition or one year with medical certificate completed by a qualified medical professional.
8c.	PacifiCorp would support increasing the time for a medical profile to one year in cases of chronic conditions confirmed by a qualified medical professional.
PSE	
8a.	<p>Zero. Puget Sound Energy keeps the qualified medical professional's letter on file for 60 days and if the customer keeps the agreed upon arrangements and subsequent bill payments over the 120-day period, a renewed medical letter is not required. Described below is the process Puget Sound Energy follows to meet WAC 480-90/100-128(8) for medical conditions or emergencies:</p> <ol style="list-style-type: none"> 1. Customer informs Puget Sound Energy of a medical condition or emergency at the residential address which requires electricity or natural gas. 2. If a field visit, Puget Sound Energy does not disconnect, leaves a notice and requests the customer to call and claim medical emergency. 3. If a phone call, Puget Sound Energy verifies eligibility by reviewing the residential address is either in danger of disconnection or service has been disconnected. PSE verifies the person with the medical condition is a resident of the address and does not need to be listed on the account. 4. Puget Sound Energy explains to the customer what is necessary for medical emergency and holds the account for 5 business days from disconnection or reconnects service. If the following conditions are met, service will not be in jeopardy of disconnection: <ol style="list-style-type: none"> i. Within 5 business days:

	<p>1. A letter on a qualified medical professional's letterhead must be received which includes: patient's address/location, explanation of how the medical condition will be aggravated by the disconnect of service, a statement of how long the condition is expected to last and title, signature and phone number of person certifying the medical condition AND</p> <p>2. Payment of 10% of the past due balance owing on the account.</p> <p>ii. Payment Arrangement on the entire past due balance which is spread over the following 120 days and agreed with the customer.</p> <p>iii. Verbal agreement from the customer to pay subsequent bills when due.</p> <p>If Puget Sound Energy does not receive the qualified medical professional's letter or payment for the 10% of the past due balance by business day 6, the medical emergency will be deactivated, a letter will be sent, and the account will move through the notice process depending on the status of the charges remaining on the account.</p>
8b.	<p>Puget Sound Energy protects the account from notices and disconnection for 120 days if the agreement for medical emergency payment arrangements and a qualified medical professional's letter is received within 5 business days, and subsequent bills are paid when due. The purpose of the medical emergency is to protect the customer from being disconnected or being in jeopardy of disconnection.</p> <p>PSE welcomes discussion about how information in the medical statement could be used to determine the duration of the medical emergency.</p>
8c.	<p>Puget Sound Energy keeps the qualified medical professional's letter on file for 60 days and if the customer keeps the agreed upon arrangements and subsequent bill payments over the 120-day period a renewed medical letter is not required.</p> <p>Puget Sound Energy has an internal process for residential customers with electric service who have life supporting equipment. Once informed of life sustaining equipment in the home, a seal is placed around the electric meter which provides an indication to field personnel that life support is being used inside the residence. A letter with a form is sent to the customer requesting verification that the individual requiring life support lives at the location and the form must be filled out by the medical provider. This ensures every effort is made to avoid disconnection of service, particularly in the event of a delinquent balance.</p> <p>Life Support process is intended for ongoing life-sustaining equipment in long-term use at the location and, unlike Medical Emergency, is not an arrangement for payment but rather an agreement to leave a 48-hour notice prior to disconnection of service after notice requirements are met. There is an annual renewal form of life support via letter. If the form is not returned the life support seal will be removed from the meter.</p>
Public Counsel	
8a.	<i>In addition to TEPs concerns the rule should be clarified to ensure that medical emergencies apply to all members of a household, including dependents and not just the primary account holder.</i>
8b.	Yes, medical emergencies could remain in effect for the stated duration of the condition. Alternatively they could be extended 12-months or annually for administrative simplicity.
8c.	No, recertification should not be required for individuals with chronic medical conditions. Individuals suffering from chronic conditions will need protection on a long-term basis. Identifying which conditions are considered chronic may be difficult, the Commission should consult with experts to identify which conditions are chronic.
TEP	
8a.	N/A
8b.	Renewing medical certifications every sixty days can be onerous, particularly for customers living with chronic health conditions. If the Commission continues to permit disconnections for nonpayment, the Commission should eliminate the requirement in the

	rules for renewal of medical certifications after sixty days. Instead, medical certifications should be valid for the duration of the health condition.
8c.	See answer for 8b.

9. For premise visits prior to disconnection for non-payment of customers with medical certificates and low-income customers, please provide the number of visits conducted and the number of visits that resulted in customers making payment at the door in 2018 and 2019.

Question	Summary of Comments															
Avista																
9.	<p>Please see the table below which provides the total number of field visits for non-payment and the number of field visits that resulted in a payment received prior to disconnection for non-payment for low-income customers and customers with EMCs. For clarification, the data below reflects customers who received energy assistance at any point in 2018 or 2019 while EMCs account for customers who had a field visit for disconnection for non-payment any time after claiming an EMC during the 2018 or 2019 calendar years.</p> <table border="1"> <thead> <tr> <th></th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>EMC Field Visit Total</td> <td>157</td> <td>70</td> </tr> <tr> <td>EMC Payments</td> <td>45</td> <td>13</td> </tr> <tr> <td>Low-Income Field Visit Total</td> <td>1,361</td> <td>966</td> </tr> <tr> <td>Low-Income Payments</td> <td>584</td> <td>271</td> </tr> </tbody> </table> <p>*Data in the table above may include duplicate customers i.e., customers who claimed EMC may have also received energy assistance</p>		2018	2019	EMC Field Visit Total	157	70	EMC Payments	45	13	Low-Income Field Visit Total	1,361	966	Low-Income Payments	584	271
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Cascade																
9.	<p>2018:</p> <ul style="list-style-type: none"> *For customers who provided a medical certificate at any time in the year 2018, there were 6 orders dispatched for non-payment and 5 payments collected after the field visit to prevent disconnection. **For customers receiving assistance used to define low-income at any time in the year 2018, there were 83 orders dispatched for non-payment and 28 payments collected after the field visit to prevent disconnection. <p>2019:</p> <ul style="list-style-type: none"> *For customers who provided a medical certificate at any time in the year 2019, there were 3 orders dispatched for non-payment and 2 payments collected after the field visit to prevent disconnection. **For customers receiving assistance used to define low-income at any time in the year 2019, there were 61 orders dispatched for non-payment and 19 payments collected after the field visit to prevent disconnection. <p>*This data does not reflect payments returned NSF or whether the qualifying medical certificate was active before or after the payment collected in the field</p> <p>**This data does not reflect payments returned NSF or whether the qualifying energy assistance payments were received before or after the payment collected in the field.</p>															
NW Natural																

Question	Summary of Comments																																
9.	<p>Medical Certificate Customers: We did not issue any field orders to disconnect for non-payment from January 1, 2018 through December 31, 2019 for medical certificate customers so there were no payments collected for these customers in the field.</p> <p>Low-Income Customers:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="3" style="text-align: center;">Disconnection Field Order Outcomes</th> </tr> <tr> <th style="width: 70%;">Disconnection Field Orders Completed without Disruption of Service</th> <th style="width: 15%;">2018</th> <th style="width: 15%;">2019</th> </tr> </thead> <tbody> <tr> <td>*Disconnection Field Orders Cancelled by Technician - New Order Issued</td> <td style="text-align: center;">1</td> <td style="text-align: center;">9</td> </tr> <tr> <td>Arrangements Made at Door - No Payment to Technician</td> <td style="text-align: center;">11</td> <td style="text-align: center;">2</td> </tr> <tr> <td>Customer Paid Technician at Door</td> <td style="text-align: center;">2</td> <td style="text-align: center;">2</td> </tr> <tr> <td>Completed Disconnection Field Orders</td> <td style="text-align: center;">14</td> <td style="text-align: center;">6</td> </tr> <tr> <td>Closed Disconnection Field Order - No Access to Meter</td> <td style="text-align: center;">0</td> <td style="text-align: center;">1</td> </tr> <tr> <td>Total Visits</td> <td style="text-align: center;">28</td> <td style="text-align: center;">20</td> </tr> <tr> <td>Total Visits - Customer Paid Technician at Door (count)</td> <td style="text-align: center;">2</td> <td style="text-align: center;">2</td> </tr> <tr> <td>Total Visits - Customer Paid Technician at Door (Percent)</td> <td style="text-align: center;">7%</td> <td style="text-align: center;">10%</td> </tr> </tbody> </table> <p>*Occurs when customer is being given time to meet the terms of an arrangement to prevent completion of an additional disconnection field order, i.e., make a payment, start a time payment agreement (TPA), or in the case of a low-income customer, obtain energy assistance, etc. In many cases, the second disconnection field order is cancelled due to receipt of payment, an energy assistance commitment, or a TPA setup. Since the pandemic, disconnection would be stopped altogether to allow a low-income customer to pursue energy assistance and/or CAP funds would be provided.</p>			Disconnection Field Order Outcomes			Disconnection Field Orders Completed without Disruption of Service	2018	2019	*Disconnection Field Orders Cancelled by Technician - New Order Issued	1	9	Arrangements Made at Door - No Payment to Technician	11	2	Customer Paid Technician at Door	2	2	Completed Disconnection Field Orders	14	6	Closed Disconnection Field Order - No Access to Meter	0	1	Total Visits	28	20	Total Visits - Customer Paid Technician at Door (count)	2	2	Total Visits - Customer Paid Technician at Door (Percent)	7%	10%
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PacifiCorp																																	
9.		2018	2019																														
	Number of Visits	75	52																														
	Number of Payments	35	6																														
PSE																																	
9.	<p>The table below provides the number of visits conducted and the number of visits that resulted in customers making payment at that door that were known low income from receiving energy assistance (PSE HELP or LIHEAP) within the last 12 months in 2018 and 2019. PSE does not visit or disconnect customers with a current medical certificate on file.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="width: 40%;">Type</th> <th colspan="2" style="text-align: center;">Field Visits and Payments</th> </tr> <tr> <th style="width: 30%;">2018</th> <th style="width: 30%;">2019</th> </tr> </thead> <tbody> <tr> <td>Total Field Visits</td> <td style="text-align: center;">76,213</td> <td style="text-align: center;">75,280</td> </tr> <tr> <td>Total Field Collections</td> <td style="text-align: center;">28,380</td> <td style="text-align: center;">22,944</td> </tr> <tr> <td>Field Visits-Low Income Customers</td> <td style="text-align: center;">476 (0.6%)</td> <td style="text-align: center;">1,105 (1.5%)</td> </tr> <tr> <td>Field Collections-Low Income Customers</td> <td style="text-align: center;">420 (1.5%)</td> <td style="text-align: center;">597 (2.6%)</td> </tr> </tbody> </table>			Type	Field Visits and Payments		2018	2019	Total Field Visits	76,213	75,280	Total Field Collections	28,380	22,944	Field Visits-Low Income Customers	476 (0.6%)	1,105 (1.5%)	Field Collections-Low Income Customers	420 (1.5%)	597 (2.6%)													
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Public Counsel																																	
9.	N/A																																
TEP																																	

Question	Summary of Comments
9.	N/A

10. Please provide your company's internal deposit requirement criteria, including a narrative description of the criteria, factors, and relevant information used to determine whether customers are required to pay a deposit.

Question	Summary of Comments
Avista	
10.	<p>Deposits are utilized to secure accounts by reducing arrears when a customer's account closes or is disconnected for non-payment. When determining the need for a deposit for customers who have already established payment history with the Company, Avista's deposit criteria aligns with the provisions in WAC 480-100-113(1) and (2). The Company looks for 1) if any write offs exist for that customer within the previous 6 years, 2) if the customer has received three or more final notices in the past 12 months, 3) is the customer currently disconnected for non-payment, 4) if the customers has any closed accounts with an unpaid balance over 30 days, 5) if the customers Avista account was included in a bankruptcy filing in the past 12 months with a pre-petition amount owing, and 6) if the customers is establishing a new commercial account which has not established payment history with the Company. If a customer voices dissatisfaction or is unable to pay a deposit, in compliance with WAC 480-100-113 (5) CSRs will provide the customer with the option to provide a letter of guarantee in leu of a deposit.</p> <p>Avista does not request deposits for new customers who have not had the opportunity to establish payment history with the Company.</p> <p>It is important to note that while a customer has an active deposit on file with the Company, interest is accrued monthly in accordance with WAC 480-100-113(9). Interest begins to accrue with the customers first payment and continues to accrue each month until the deposit is refunded back to the customer.</p>
Cascade	
10.	<p>Currently Cascade is not charging Residential deposits. Prior to the moratorium, if an applicant/customer met two of the following three criteria when starting new service, no deposit was required:</p> <ul style="list-style-type: none"> • 12 months of continuous employment • Own the property • 12 months of service with CNG in past 2 years with satisfactory payment/credit history
NW Natural	
10.	<p>No deposit is required if a Washington residential applicant meets ANY of the following requirements AND does not meet any criteria for unsatisfactory credit:</p> <ul style="list-style-type: none"> • Applicant has had prior service with Northwest Natural for 12 consecutive months (during the past 24 months service was not disconnected for non-payment, no unpaid/overdue balance exists, no more than one 5-day notice during this period of service). • Applicant is currently employed or has a stable income and has been employed for the past 12 months by no more than two employers. • Applicant owns or is purchasing the premises to be serviced. • The account has an existing Landlord-between-Tenant contract on file for the premise in question. <p>Has 12 consecutive months (during the past 24 months) of utility service of the same type applied for; that we can verify, either by contacting the former utility or through an authorized letter provided by the former utility (on utility letterhead). The letter must include dates of service and presented by the applicant (or former utility.) Documentation must state that the applicant voluntarily terminated service and timely paid for all service rendered.</p>

	<p>o If gas is on, the letter must be received within 5 business days. o If gas is off, the letter must be received prior to turn-on.</p> <ul style="list-style-type: none"> • Applicant provides a Surety Agreement. If gas is off, the signed agreement must be received prior to turn-on. If gas is on, the agreement must be returned within 5 business days. • Applicant initiates an EPP and makes first payment in advance of service. <p style="text-align: center;"><u>Washington Residential – Unsatisfactory Credit</u></p> <p>An applicant or customer may be required to pay a deposit or provide a signed surety agreement when:</p> <ul style="list-style-type: none"> • The applicant or customer is unable to establish satisfactory credit as noted above. • The customer has been disconnected for non-payment within the past 12 months. • The customer has an unpaid overdue balance. • The customer has received two or more 5-day notices within the past 12 months. • Another occupant at the address has an overdue bill owed to Northwest Natural. • The applicant is an estate or trust. An estate or trust may not avoid a deposit by sending a signed Surety Agreement.
<i>PacifiCorp</i>	
10.	<p>PacifiCorp’s current deposit requirements are as follows:</p> <ul style="list-style-type: none"> • Customer has received more than two past due notices within the last 12 months • Customer has been disconnected for non-payment • Customer/Applicant has an unpaid balance for prior service • Customer resides at the residence and has an unpaid balance for service • Bankruptcy • Applicant does not own or is not purchasing the residence to be served • Applicant is unable to demonstrate regular source of income
<i>PSE</i>	
10.	<p>A deposit is a collectible that protects the company from the liability of unpaid accounts and services. A deposit is equal to two-twelfths of the estimated annual billing for gas and/or electric services with monthly billing; or three-twelfths of the estimated annual billing for gas and/or electric services with bi-monthly billing.</p> <p>A deposit is assessed upon Move in and will remain on a customer's account for a minimum of 12 months, unless the customer meets the guidelines of a deposit waiver (residential):</p> <ul style="list-style-type: none"> • Letter of credit from another utility • Guarantor • Automatic Payment Plans • Ownership • Employment history • Existing Customer <p>For residential accounts with 12 months of satisfactory payment history and no more than 2 notices in the last 12 months, any assessed deposit will be refunded or it will be returned during the Move out process and automatically apply to any past due charges first, and then be returned to the account as a credit. At that time, a refund can be initiated.</p> <ul style="list-style-type: none"> • Upon assessment of a deposit, the customer will automatically receive a Deposit Installment Plan confirmation letter indicating the deposit to be paid in full within 90 days; <ul style="list-style-type: none"> o Half Deposit by first due date o Quarter by the second due date o Quarter by the final due date • Deposit Interest begins to accrue as soon as a payment is made. The system doesn't wait until a deposit is in a "paid in full" status.

	• A deposit applies to outstanding unpaid balances upon closing of the contract with any remaining funds to be refunded.
Public Counsel	
10.	N/A
TEP	
10.	N/A

11. Please describe your company's reporting practices to credit bureaus, including historic practices, collection agencies used, and the terms of all contracts with (and the policies of) all collection agencies used.

Question	Summary of Comments
Avista	
11.	<p>Avista engages with two collection agencies for its Washington service territory, Valley Empire Collections (Valley) and Chapman Financial Services (Chapman), contracts for both agencies started in 2003. It is important to note that Avista does not refer active accounts to collection agencies. The process of sending balances to a collection agency is initiated once the customers closing bill becomes past due (20 day after the bill issue date) and occurs over a 42-business day window. The Company issues several notices prior to sending balances to a collection agency, notices include 1) a closing bill reminder to inform the customer of the remaining past due amount, 2) an automated call providing an additional reminder of the outstanding balance, and 3) a final letter informing the customer of the potential collection agency referral if the balance remains unpaid or payment arrangements are not established. As of September 2, 2020, Valley Empire and Chapman Financial discontinued reporting Avista customers to credit bureaus. Previously, both agencies would refrain from reporting unpaid establish payment arrangements or receive payment on the outstanding balance. Balances that remain with the collection agency after the initial 30 days were reported to Experian, Transunion, and Equifax.</p> <p>It is Avista's objective to maintain and build strong partnerships with the collection agencies, provide and received effective communication, and establish mutual accountability with a collaborative approach. To honor this goal, in 2017 Avista developed "Collection Agency Scorecards" to ensure the collection agencies are respectfully and effectively attempting to collect unpaid arrears on Avista's behalf. The Company meets with each collection agency individually to review their annual scorecards and discuss what is working and where the agency can improve. Collection Agency Scorecards measure the following:</p> <p style="padding-left: 40px;">Customer Service:</p> <p style="padding-left: 40px;">a. Customer experience with the specific agency. b. Employee experience with the specific agency</p> <p style="padding-left: 40px;">Delivery:</p> <p style="padding-left: 40px;">a. Average number of days to collect b. Commission rate c. Percent of unpaid dollars recovered</p> <p style="padding-left: 40px;">Innovation and Technology:</p> <p style="padding-left: 40px;">a. Avista's ability to access customer account data through an online web portal b. Agency is licensed in multiple states (i.e., the agency is licensed to work in Washington State)</p> <p style="padding-left: 40px;">Quality of Service:</p> <p style="padding-left: 40px;">a. Provides full disclosure for all status updates on customer accounts to include payments made, bankruptcy filings, or if a customer is deceased b. Status update turnaround time: how quickly does the agency inform Avista when a customer makes a payment or files bankruptcy, etc.</p>

Question	Summary of Comments
	<p>c. Local socioeconomic knowledge (locally based)</p> <p>d. Communication response time: how responsive is the collection agency in providing requested account records to Avista</p> <p>e. Point of contact (account manager): is there a specific person that works directly with Avista to resolve issues or answer questions.</p> <p>Risk Mitigation:</p> <p>a. Data collection format: are status updated provided in an Avista’s approved format. Since implementing these scorecards, Avista has seen an improvement in agency effectiveness and customer experience for each agency.</p> <p>Please see Attachments A and B for the specific contract terms agreed to between Avista and each agency. The attachments have been provided in redacted format as portions of the contract terms are not applicable to the conversation pertaining to this docket.</p>
Cascade	
11.	<p>Cascade and the collection agencies with whom Cascade holds contracts do not report CNG accounts to credit bureaus. Prior to 2020, Cascade had one Collection Agency reporting to bureaus. It is not our intention at this time to resume this practice.</p>
NW Natural	
11.	<p>NW Natural does not directly report to credit bureaus, historically or currently. NW Natural does send uncollectible accounts to a collection agency, and those agencies may report items to the credit bureau in an attempt to collect on the debt.</p> <p>Since 2007 NW Natural has been sending the uncollectible accounts in Washington to two collection agencies: Ray Klein, Inc. dba Professional Credit Service, and Bonneville Collections.</p>
PacifiCorp	
11.	<p>PacifiCorp does not directly report customers to credit agencies. PacifiCorp may refer a delinquent customer account to a collection agency once the account is closed either by disconnection or by customer request. As part of that process, collection agencies may report customers to credit bureaus. PacifiCorp uses a standard professional services agreement to contract with collection agencies.</p>
PSE	
11.	<p>PSE does not report accounts to credit bureaus. PSE discontinued credit reporting in September 2016, and at that time had external collection agency partners review current inventory. Accounts that had been reported were removed from the credit bureaus. PSE has contracts with five collection agencies: IC System, Inc., PMT Solutions, LLC, Sentry Credit, Inc., Receivables Performance Management, LLC., and Convergent Outsourcing, Inc.. Collection agencies to whom PSE sends uncollectable accounts also do not report accounts to credit bureaus, and must receive written authorization from PSE to do so.</p>
Public Counsel	
11.	N/A
TEP	
11.	<p>TEP is particularly concerned with the disparate and inequitable impacts of reporting utility debt to credit bureaus. TEP’s analysis of IOU arrearage data from the COVID-19 docket showed that a substantial portion of residential customer arrearages are concentrated in certain zip codes that also contain highly impacted communities.³⁷ These findings are consistent with recent reports by the NAACP and others that BIPOC households are much more likely to face significant energy burdens.³⁸</p>

12. Please explain how your company uses customer credit scores.

Question	Summary of Comments
Avista	
12.	Avista uses internal credit codes when determining balance thresholds for its collections processes. The Company has utilized Total Solutions, Inc. (TSI), a third-party vendor, since 2010 to provide customer behavioral credit scoring. TSI's Behavioral Attribute Scoring Engine (BASE) is a parameter driven, server-based system which applies behavioral and scoring algorithms to Avista's data attributes. This scoring process uses internal, (non-personal identifiable information (PII)) customer payment and behavior information to focus collection efforts on the accounts most likely to become uncollectable. Each account is sent to TSI on a monthly basis to review the account details and ensure the correct credit code is established for each account. TSI provides Avista with the appropriate code based on the customers individual history.
Cascade	
12.	External credit scores are not obtained for Cascade residential customers.
NW Natural	
12.	NW Natural does not use customer credit scores.
PacifiCorp	
12.	No. The company does not collect or use credit scores.
PSE	
12.	PSE does not use a credit score; we utilize a propensity to pay score which is based on historic, unique customer payment behaviors only with PSE.
Public Counsel	
12.	<i>IOUs should provide data on the use of internal credit scores, how are they used?</i>
TEP	
12.	<p>TEP is particularly concerned with the disparate and inequitable impacts of reporting utility debt to credit bureaus. TEP's analysis of IOU arrearage data from the COVID-19 docket showed that a substantial portion of residential customer arrearages are concentrated in certain zip codes that also contain highly impacted communities. These findings are consistent with recent reports by the NAACP and others that BIPOC households are much more likely to face significant energy burdens. Some of the IOUs indicated they did not report arrearage information to credit bureaus, including PSE.⁴¹ However, the IOUs also contract with third-party collections agencies, and it is possible that those collection agencies report customer debt to credit bureaus. PacifiCorp's initial comments indicated that indeed, the collection agencies it works with do in fact report customer debt to credit bureaus.</p> <p>In light of the potential harms to low-income customers, the Commission should consider amending the rules to (1) prohibit utilities from sharing information on customer arrears with credit reporting bureaus, and (2) require utilities to include an equivalent prohibition in all contracts with collection agencies.</p>

Credit and Collection

13. Please provide a list, including addresses, of all payment locations, the tender accepted at each location, and any fees.

Question	Summary of Comments
Avista	
13.	Please see Attachment C for a list of the current authorized payment locations within Avista's Washington service territory, including Western Union, manual pay stations, and

Question	Summary of Comments
	drop boxes. All pay stations listed accept cash, check, or money order, though it is recommended that cash payments be made at pay stations, not left in drop boxes. The Company also has a kiosk located at its main office (1411 E. Mission Avenue, Spokane, WA 99202) that accepts cash, check, or credit card. Customers encounter no fees for making a payment at any of these authorized payment locations. Customers may also make payments at any other Western Union location (e.g., Walmart, Fred Meyer, etc.), but these payments are subject to whatever fees the given organization has set.
Cascade	
13.	Please see Cascade Natural Gas Payment Locations – Quick Collect Cash Only.PDF and Cascade Natural Gas Payment Locations – Washington Payment Locations.PDF. No fees are associated with any of the locations. The Walmart locations are cash only and all other locations accept cash, card, or check.
NW Natural	
13.	The following is a list, including addresses, of all the Company’s payment locations in Washington and the tender accepted at each location. There are no fees to use these pay stations. In addition to these pay stations in Washington, all 246 pay stations located in Oregon are available for Washington customers to use to make payments.
PacifiCorp	
13.	Please refer to Attachment A.
PSE	
13.	PSE does not charge payment fees at any of its approved payment locations. The table of approved locations and accepted payment tender for each location is provided in Appendix A and at this link PSE Find a Pay Station for Your Bill. Third parties may process utility payments at locations not in this approved list for a fee.
Public Counsel	
13.	IOUs should also provide data on the fees that apply to certain payment types or locations.
TEP	
13.	N/A

14. Does your company use liens in any of its practices? If so, please explain your practice(s).

Question	Summary of Comments
Avista	
14.	Avista does not use liens in any of its credit or collections practices.
Cascade	
14.	No, Cascade does not use liens in any of its practices.
NW Natural	
14.	We have used liens in the past and currently have active property liens for weatherization services performed under an on-the-bill financing program from the late-1970s to early-1980s in partnership with Far West Federal Savings & Loan or “Far West” (no longer in business). Customers typically inform us of a weatherization lien against their property upon its discovery when they attempt to sell it. At that time, NW Natural files a notarized Satisfaction of Weatherization Lien document with the County Clerk’s Office to discharge the lien. The most recent discharge of an active lien occurred in May of 2022.
PacifiCorp	
14.	No. The company does not use liens as part of our disconnection for non-payment practices.
PSE	

14.	If PSE property is damaged by a third party, we have a damage claims process to collect those damages. There are times when PSE may obtain a lien against an individual or a corporation, although it is not common. It could occur under the following circumstances: <ul style="list-style-type: none"> • If PSE is unable to voluntarily collect from a party for a damage claim (either by payment in full or by agreeing to a payment plan overtime) it will seek a judgement in a court of law. • Judgements are then sent to PSE’s collection agency to work to obtain payments. If the collection agency is unable to obtain a voluntary agreement to pay or make payments, they may seek to obtain a lien against the party.
Public Counsel	
14.	N/A
TEP	
14.	It would be helpful to understand whether liens are used by 3 rd party collection agencies the IOUs contract with. TEP recommends the Commission prohibit the imposition of liens on non-vacant residential property as a strategy for collecting utility arrears.

Disconnection Notices

15. Are there any other changes the Commission should consider to the customer notice rules in WACs 480-90-193, 480-90-194, 480-90-195, 480-90-197, 480-90-198, 480-100-193, 480-100-194, 480-100-195, 480-100-197, 480-100-198? Please provide any suggested changes in legislative format (track changes).

Question	Summary of Comments
Avista	
15.	Avista does not have any additional recommended changes for Commission consideration to these customer notice rules at this time.
Cascade	
15.	Please see attached 480-90-193.pdf and 480-90-197.pdf for proposed deletions. Cascade proposes deleting WAC 480-90-193(2) because it considers it to be antiquated, impractical, and unsafe. Also, 480-90-193 (1)(c) should cover any need for a physical copy of a tariff or section/page of a tariff. The company also proposes eliminating WAC 480-90-197(4) because it is outdated due to the many other options the company has for methods of notice.
NW Natural	
15.	NW Natural has no specific comments regarding this question at this time; the Company will participate in the upcoming workshop and reserves the right to provide additional comments after the workshop and after reviewing the written comments submitted.
PacifiCorp	
15.	PacifiCorp does not have any additional recommendations at this time.
PSE	
15.	PSE proposes deleting WAC 480-90-193(2) and WAC 480-100-193(2) because they are impractical and not an option of which customers avail themselves. Furthermore, WAC 480-90-193 (1)(c) and WAC 480-100-193 (1) (c) should cover any need for a physical copy of a tariff or section/page of a tariff. PSE does not propose any further changes at this time.
Public Counsel	
15.	See Public Counsel comments, Appendix A
TEP	
15.	No specific recommendation.

ADDITIONAL QUESTIONS FOR WRITTEN COMMENTS OR DISCUSSION

16. *Should the Commission broaden the requirements for offering payment arrangements? For example, see Maine’s Consumer Protection Standards for Electric and Gas Transmission and Distribution Utilities at p. 23, linked here⁶. Should the Commission adopt a similar policy?*

Question	Summary of Comments
Avista	
16.	<p>It is not necessary for the Commission to broaden the requirements for offering payment arrangements beyond what is already required. In reviewing Maine’s standards, the Company offers the following comments:</p> <p style="padding-left: 40px;">a. Written confirmation of payment arrangements – For Avista, customers enter payment arrangements by phone with a CSR or online at myavista.com. Through either path, a customer is made aware of what will happen if they fail to complete their payment arrangements. For short term payment arrangements, where a customer agrees to pay off their past due balance prior to their next bill, mailing or delivering confirmation of the arrangement is optional. The CSR will ask if the customer would prefer a written confirmation letter that outlines the terms of the short term payment arrangement. For long term payment arrangements, customers see their arrangement on their future bills. As a result, mailing or delivering written confirmation of the payment arrangements is not necessary.</p> <p style="padding-left: 40px;">b. Basic service payment arrangements to be separate – While Avista does offer On-Bill Repayment (OBR) for customers to repay energy efficiency loans on its bill, the Company’s OBR clearly specifies that repayment of OBR loans and amounts owed for energy services are completely separate and are handled as such in the event of past dues or arrangements, thus this would not be relevant.</p> <p style="padding-left: 40px;">c. Written guidelines – the minimum guidelines for payment arrangements are already included in rule. Avista does maintain internal guidelines for offering payment arrangements which empower its CSRs to work with customers to select the arrangements that work best for customers. Also, customers are able to self-enroll in payment arrangements online that work best for them. Memorializing the need for written guidelines in rule is unnecessary.</p> <p style="padding-left: 40px;">d. Residential customer requirements – these requirements are already considered in rule and when Avista offers payment arrangements to customers. This level of detail in rule is not necessary. For failure to comply with a payment arrangement, customers are able to renegotiate their arrangement, and if they ultimately do not fulfill the obligation of their payment arrangements, they will then go through the collections process and may face disconnection.</p> <p style="padding-left: 40px;">e. Non-residential customer requirements – Avista already considers these factors when offering payment arrangements to non-residential customers. Additional specificity in rule for non-residential customers does not seem necessary at this time.</p>
Cascade	
16.	<p>Cascade is supportive of reviewing the current payment arrangement options to determine if they offer adequate options and flexibility. Cascade believes the Maine rules are overly complex and burdensome and would seek to establish payment arrangement options that are</p>

⁶ <https://www.maine.gov/sos/cec/rules/65/407/407c815.docx>

	clear and easy for customers to understand and adhere to as well as not overly burdensome for the company to manage.
<i>NW Natural</i>	
16.	NW Natural has no specific responses to these questions at this time. The Company will participate in the upcoming workshop and reserves the right to provide additional comments on this topic after the workshop and after reviewing the written comments submitted.
<i>PacifiCorp</i>	
16.	PacifiCorp currently offers flexible payments arrangements to customers in arrears including 12-month payment plans. PacifiCorp is not opposed to reviewing and discussing alternative options for payment plan requirements. PacifiCorp believes, however, that Maine’s payment plan rules do not allow for the same type of flexibility the utilities have with the current rules and would like to see any payment arrangement rule in Washington to maintain flexibility while not being overly burdensome or confusing for the Company or the customer.
<i>PSE</i>	
16.	<p>The Commission should not adopt a payment arrangement policy similar to Maine’s. Customers already receive several of the protections listed in Maine’s policy through WAC rules, such as WAC 480-100-143 defining Washington’s winter low-income payment program, or from utility practice, such as PSE sending the customer confirmation of their payment arrangement plan. Furthermore, the largest difference between Maine’s policy and existing practice in Washington is that Maine’s policy specifies what criteria the utility must consider in order for a payment arrangement to be reasonable, while utilities in Washington do not have those restrictions. This flexibility is better for customers as it allows the customer to select the option that best fits their needs. The customer is best able to know how much they are able to pay, when, and how much time they need to pay off their past due balance; PSE does not and cannot know the customer’s complete life situation impacting their ability to pay, therefore, the customer is best situated to select the payment arrangement plan, not PSE. Adopting Maine’s payment arrangement plan would remove that flexibility that benefits the customer.</p> <p>Described below is how PSE offers payment arrangements: Payment Plans are agreements between a customer and PSE that allow the customer to make incremental payments on their outstanding balance. Deferrals, Installment Plans, and Payment Arrangements may be established on a Business Partner's account for several reasons, including:</p> <ul style="list-style-type: none"> • Inability to pay charges by the due date • Back-billing • Medical Emergency • SAP charges (Customer Construction, Appliance Repair) • Deposit <p>Customers may select the frequency and duration that best fits their needs. They can select between weekly, bi-weekly, and monthly plans that are offered for up to 18 months. Customers may have up to 6 failed payment plans in a rolling 12 months, there is no upfront minimum amount due, and the customer is responsible for paying the past due payment plan amount they agreed to including any on-going future usage. Customers can choose to self-serve on PSE.com, call our IVR, or speak to an agent to set up a payment plan.</p>
<i>Public Counsel</i>	
16.	Public Counsel believes it is a good idea to include in rule a detailed outline of how payment plans should be arranged and the terms available. Public Counsel expresses concern that some utilities may already be offering more accommodating terms than in the Maine

	example. Public Counsel also notes that grace for one or more missed payments should be a consideration and that customer circumstances should be taken into account. A one size fits all approach may be. In addition to payment plans utilities should be required to inform customers they may be eligible for Arrearage Management Plans.
TEP	
16.	<p><i>See answer to 1f.</i></p> <p>The Commission should require utilities offer access to payment plans.</p> <p>Maine’s payment plan policy contains several strong features which the Commission and utilities could draw from, in consultation with the low-income advisory groups.¹² TEP generally supports Maine’s payment plan policy. As the Commission considers creating an analogous policy in Washington, it may wish to consider the following features of Maine’s policy that promote equity by considering individual customers’ circumstances</p> <ul style="list-style-type: none"> • Individualized payment arrangements. Every residential customer should have access to a payment plan that takes into account the customer’s individualized circumstances. Income requirements should not apply. • Referral to the Consumer Protection Division. If a utility and customer cannot agree on the terms of a payment plan, the dispute should be referred to the Commission’s Consumer Protection Division for resolution. • Written Guidelines. Utilities should create written guidelines that describe the contents and procedures of the payment plan program. Those guidelines could be located in the utility’s tariff or a separate document. The utilities should consult with the low-income advisory groups prior to modifying the guidelines and should provide updated copies to the Commission and Community Action Partnership agencies after any modification. <p>The Commission should improve upon Maine’s policy by specifying that utilities must include an AMP with forgiveness for customers with low and moderate incomes.</p>

17. *If disconnections for non-payment continue:*
- The Commission currently requires site visits prior to disconnecting a customer with a medical certificate or a customer who has received energy assistance. Should a site visit be required prior to all disconnections for non-payment?*
 - Should the Commission require a minimum overdue account balance prior to disconnecting for non-payment?*
 - Should the Commission require a minimum overdue account balance prior to disconnecting for non-payment?*

Question	Summary of Comments
Avista	
17.	<i>See below responses for response to 17.</i>
17a.	No, a site visit should not be required prior to all disconnections for non-payment. This is an inefficient practice that would add unnecessary premise visits, thereby resulting in unnecessary labor and resources and minimization of the benefits of remote disconnection and reconnection enabled by Advanced Metering Infrastructure (AMI). Customers have a multitude of bill and payment tools available, as well as communication tools for them to select the communication channel for bills and billing alerts that they desire. Additionally, with the introduction of energy assistance options such as bill discounts pursuant to Senate

Question	Summary of Comments
	Bill (SB) 5295, the Company expects saturation rates for its energy assistance options to increase exponentially. While this will, ideally, help to decrease the number of customers eligible for potential disconnection each year since these customers will have assistance in place to appropriately reduce their energy burden, this increase in energy assistance participants will also increase the number of site visits already being completed by the Company under the current rules (EMC and energy assistance recipients). The current policy of requiring a site visit for known low-income customers or customers with a medical certificate provides sufficient protection to vulnerable customers.
17b.	No, it should not. Each utility is unique in their average bill amount, especially depending on if a customer receives electric service, natural gas service, or both. Also, depending on the season, bills fluctuate greatly. If a customer has an overdue balance, then they should be eligible for disconnection.
17c	No, it should not. The process established in Docket U-200281 has not proved useful. For many months it created a significant bottle neck with the Consumer Protection Staff that effectively extended the disconnection moratorium. Even after making the process more efficient, it did not seem useful as very few customers took action after receiving notice from the Commission. In the majority of all cases, Avista was given the go ahead to resume collections and disconnections after the customer did not respond to the Commission’s notice. So long as utilities are in compliance with the rules around billing, payment arrangements, and collections, additional approval from the Commission to perform a disconnection is overly burdensome and not necessary.
Cascade	
17.	<i>See below responses for response to 17.</i>
17a.	Cascade Service Mechanics must turn off gas service at the customer’s premise. This process is not changing in the foreseeable future. When visiting the customer’s premise to disconnect service the Cascade Service Mechanic is required to knock on the customer’s door to notify the customer of the purpose of their visit and to take payment by check to avoid disconnect if offered by the customer. If a customer indicates they would like to make a payment by a method other than check, the Cascade Service Mechanic provides the customer with information on how they can make payments with Customer Service or at Convenience Pay locations and allows the customer time to do so.
17b.	Since circumstances vary by utility service type (electric or gas), service territory (urban vs. rural mix), and utility company, Cascade does not support requiring a minimum overdue account balance prior to disconnecting for non-payment. Cascade believes each utility should maintain the flexibility to establish reasonable thresholds for overdue amounts and days past due that would lead to an account entering the collections process and becoming at risk of being disconnected if the customer does not respond to any utility efforts to make contact and resolve the past due balance, establish a payment arrangement, or facilitate energy assistance.
17c	No. The Commission’s intentions to make sure no customer is unnecessarily disconnected can impede our business processes and result in additional expense for the company and our customers. At times, the current WUTC Staff disconnect review process results in delayed responses back to the company. In some instances, those delays require the company to restart the Collections process. Restarting the Collections process results in wasted company resources and added expense. In addition, the process shifts Cascade resources from other functions, e.g., attempting to contact customers to discuss their account and options. This shifting of resources leads to higher past due balances as the company is able to assist fewer customers. Higher past due balances likely lead to higher write-offs, which also leads to

	greater write-off expense being borne by Cascade’s customers. Continuing this process or implementing a similar process causes more harm than good to the overall customer base
NW Natural	
17.	<i>See below responses for response to 17.</i>
17a.	The requirement referred to in the question is specific to electric utilities. In general, gas utilities do not yet have the technology for remote disconnection and site visits are required for disconnections and reconnections based on the need for safety inspections of the gas equipment.
17b.	It is NW Natural’s understanding that at least some utilities have a minimum past-due balance when considering the accounts that will be scheduled for disconnection for non-payment. NW Natural sends urgent 5-day notices only to those customers with a minimum \$150 accounts receivable balance. The Company supports allowing utilities to set minimum balances, if any, according to their business practices.
17c	NW Natural supports ending the practice of Commission (i.e., Consumer Staff) approval of disconnections for non-payment that was established in docket U-200281. While the Company appreciates the work of Consumer Staff in the detailed processing of these approvals, for our staff, the process of identifying, compiling, requesting and tracking the accounts sent to the Commission for approvals is entirely manual, very inefficient and would remove CSRs from the task of taking incoming phone calls. As mentioned in the response to 1f. above, there are many programs and options for customers to prevent non-payment and disconnection. We believe our CSRs are most valuable when they are focused on assisting customers in that manner. It is not clear what customer benefits are being derived from the current approval process, but NW Natural does have concerns about the potential negative customer impact of allowing past-due amounts to continue to grow during the approval process. As noted in the response and as illustrated in the graphs in 1g. above, NW Natural believes allowing customers to continue to build large balances is an inequitable outcome that could lead to future bad debt and does not address the energy burden experienced by these customers.
PacifiCorp	
17.	<i>See below responses for response to 17.</i>
17a.	No. While PacifiCorp does not currently utilize AMI technology in Washington, the Company still believes that a site visit to every residence before disconnection is unnecessary. The existing Commission rule requiring site visits for medical customers and those who have received energy assistance was implemented specifically to help protect the most vulnerable customers. Customers are currently receiving multiple notices of disconnection as well as other tailored communications from utilities such as texts, emails, and outbound phone calls. Additionally, performing site visits requires an employee and a vehicle to visit the site. This leads to added cost, creates negative environmental impacts, and puts employees at potential risk. Collection-related activities in the field are linked to customer threats and potential harm for utility employees.
17b.	PacifiCorp currently observes a minimum of \$50 for noticing of disconnection for non-payment. PacifiCorp does not support having a required minimum for disconnection and prefers having the flexibility to implement changes to the business practice when needed, particularly if new rules are implemented that affect the way the utilities are required to notice and disconnect for non-payment moving forward.
17c	No. PacifiCorp appreciates the efforts made by Consumer Staff in reviewing and approving disconnection for non-payment to help ensure customers were notified before disconnection. However, the Company believes the process of compiling customer information, requesting the disconnection of service from the Commission, tracking the customer accounts, and then ultimately renoticing customer accounts for disconnection creates an unnecessary

	administrative burden. It is unclear to PacifiCorp whether the approval process has found any concerns with the noticing the Company is providing to the customers before disconnection and the unfortunate side effect of the process is that customer accounts get further behind and build larger debt.
PSE	
17.	<i>See below responses for response to 17.</i>
17a.	No. Based on the process outlined in U-180525 regarding AMI Rulemaking, only medical certificates or customers that have received energy assistance should require a site visit. A site visit to all customers up for disconnection is not feasible based on the growing number of arrearages coming out of the Disconnect Moratorium. We conduct several outreach attempts to the customer in advance of disconnection. Remote capabilities should be a way for the company to complete the disconnection order, so it does not expire. If the order expires, the customer goes back through the dunning process, likely seeing additional past due amounts to be paid.
17b.	No, PSE supports the ability of an individual utility to set an appropriate minimum overdue account balance based on their arrearage data.
17c	No. The Commission upheld the decision to disconnect 96% of customers who reached the disconnect queue. The remaining 4% of customers indicated they had paid or would take some action and were removed from the disconnect queue.
Public Counsel	
17.	See below
17a.	<p>Yes, site visits prior to disconnection for non-payment serve as a strong customer, particularly for customers with vulnerabilities. Site visits provide the opportunity to make customers aware of options to remain connected, including payment plans, medical certificates, and bill assistance.</p> <p>Many utility customers, particularly those belonging to vulnerable or marginalized communities, do not trust institutions — including their utilities. History of discrimination or negative interactions influences the way individuals and communities view the institutions with which they interact. People who know they are behind on their utility bills and are facing the threat of disconnection may not be eager to talk to a utility representative at their door. Utilities should consider working with trusted community organizations who can make site visits ahead of disconnection. Customers may be more likely to speak to a community organization’s employee over a utility representative.</p>
17b.	Yes, it is unreasonable to disconnect service for a small amount. It would be more effective to resolve small past due balances by establishing a payment plan or enrollment in an Arrearage Management Plan.
17c	Yes, it provides an important layer of protection for utility customers. Commission approval ensures utilities comply with statutes and rules surrounding disconnection for non-payment.
TEP	
17.	See below
17a.	Supports “last knock” site visits have proven to be an effective means of avoiding the need for disconnection. Frequently, customers can pay some or all of what they owe when a utility representative comes to the residence prior to disconnection. As a result, households avoid the harsh consequences of disconnection while utilities forego the time and resources required to restart service after disconnection.
17b.	Minimum balance requirements protect customers from disconnection for minimal arrears while also preventing utilities from incurring unnecessary shutoff costs.
17c	Notice and approval from the Commission provides an opportunity for staff from the Consumer Protection Division to contact the customer and discuss payment options, as well

	as provides valuable insights for the Commission into the frequency, causes, and locations of disconnections. Such a requirement would also improve customer awareness of the UTC, a goal referenced in question 21 of the Notice.
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18. Should the Commission consider adding energy assistance requirement rules? If so, what should be included?

a. Should there be requirements for Percent Income Payment Plans?

b. Should there be requirements for Arrearage Management Plans?

Question	Summary of Comments
Avista	
18.	See below responses for response to 18.
18a.	No, it should not. Each utility already offers energy assistance options for its customers, which have gone through a process of development over many years (for Avista LIRAP has been available for roughly 20 years), with those options being approved by the Commission. In addition, energy assistance options are developed in partnership with Energy Assistance Advisory Groups, which include members from Commission Staff, Public Counsel, The Energy Project, Community Action Agencies, and many other interested stakeholders. The current process of developing and refining options with advisory groups, to then bring to the Commission for approval, works and is effective. If certain utilities are not offering all of the options that the Commission hopes to see, then that should be taken up with those individual utilities.
18b.	No, there should not be. Similarly, to what is stated above regarding Percent of Income Payment Plans, the Commission should not require in rule which energy assistance offerings should be made available.
Cascade	
18.	No, Cascade does not believe the Commission should consider adding energy assistance requirement rules. As stated in answers to other questions, customers are already provided multiple opportunities over an extended period of time to respond to the customer's contact attempts to make a payment, establish payment arrangements, or be referred to a Community Action Agency to receive assistance through LIHEAP, WEAFF, and Winter Help. In addition, as required by Legislation, Cascade will implement a rate discount program no later than October 1, 2023. The rate discount program will add to the long list of assistance options available to Cascade customers to help them avoid disconnection of service.
18a.	Cascade does not support requirements for Percent Income Payment Plans (PIPP). The company believes each utility should have the flexibility to work with stakeholders, including Commission Staff, to develop rate discount plans that meet the unique needs of customers in the utility's service territory.
18b.	The current 30-day notice as well as the required content for notices are appropriate. However, with a transition away from traditional media, including inserts, consideration should be given to digital mediums for reaching customers. A combination of email, text messaging, paid social media campaigns, and website content is more effective and representative of where customers go for information.
NW Natural	
18.	No. NW Natural cautions against setting prescriptive rules for energy assistance programs, including what types of programs should be offered. All investor-owned utilities currently have energy assistance programs and low-income and other advisory groups that can assist in providing input and guidance on the development of low-income programs. Each utility

	<p>should be allowed to maintain existing programs and craft new programs with its advisory groups and other stakeholders that best meet the needs of its unique customer communities without prescriptive and static rules that will not be flexible to meet the changing needs of its customers, the technical and administrative capabilities of the utility, and the evolving socioeconomical environment.</p> <p>The Company will participate in the upcoming workshop and reserves the right to provide additional comments on this topic after the workshop and after reviewing the written comments submitted.</p>
18a.	<i>See above responses for response to 18a.</i>
18b.	<i>See above responses for response to 18b.</i>
<i>PacifiCorp</i>	
18.	<i>See below responses for response to 18.</i>
18a.	No. PacifiCorp does not support implementing a Percentage of Income Payment Plan (PIPP) at this time. PacifiCorp does not collect, store, or maintain customer income data due to its sensitive nature. Rather than implement a PIPP, PacifiCorp would encourage customers to seek out energy assistance and become qualified for the Company’s low-income bill assistance bill discount rate.
18b.	PacifiCorp remains committed to having further conversations with stakeholders and the Low-Income Advisory Committee regarding Arrearage Management Plans (AMP) for the company’s customers. The company does not believe that a standardized AMP should be required by rule, but rather with each individual utility and stakeholder group to tailor any program to meet the needs of that utility’s customers.
<i>PSE</i>	
18.	<i>See below responses for response to 18.</i>
18a.	No. PSE would need to collect, store, and maintain sensitive income data to do the PIP calculations. The bill discount rate required by RCW 80.28.068 ⁷ is a better option for customers.
18b.	No. In order for utilities to best meet unique customer circumstances, arrearage management plans should be determined by the utility based on the individual needs of their customers and the technological capabilities available.
<i>Public Counsel</i>	
18.	Yes, the commission should set minimum standards in rule for assistance program offerings and the terms offered to qualified customers. Consistency in program offerings is desirable. Utilities should be able to make additional offerings to their customers based on the unique characteristics of the utility customer base. The commission should consider: Income eligibility criteria, documentation required, frequency of proving eligibility (documentation), guidance on auditing enrollment through self-attestation, funding mechanisms, administrative allocations to Community Action Partnership Agencies.
18a.	Yes, utilities should be required to propose Percentage of Income Payment Plans to better ensure customers have a manageable energy burden.
18b.	Yes, there should be a requirement to offer Arrearage Management Plans. Items to consider in rule include allowable frequency for enrollment, number of missed payments allowed (ex. two payments over the course of the plan), guidelines for monthly customer contribution, maximum length of AMP or number of payments to achieve debt relief.
<i>TEP</i>	
18.	<i>See answer to 1f.</i>
18a.	<i>See answer to 1f.</i>

⁷ RCW 80.28.068: Rates-Low-Income Customers. (Wa.gov)

18b.	<i>See answer to 1f.</i>
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19. How might the Commission modify the notice methods listed in WAC 480-90-194(1)-(3) and WAC 480-100-194(1)-(3) to better reach customers?

- a. Considering the reduced consumption of traditional newspaper media, is it still appropriate for customer notices to be published in newspapers?
- b. Are there any alternatives to newspaper publishing we should consider?

Question	Summary of Comments
Avista	
19.	The current rules regarding providing notice to customers regarding rate changes is sufficient. The 30-day customer notice to individual customers is the best tool to make all effected customers aware of a rate change, which is what Avista chooses to utilize for compliance with the noticing requirements.
19a.	Traditional newspaper media no longer seems appropriate for customers notices as the reach of this traditional media is shrinking. As noted above, individual customer notices are the best way to reach all effected customers
19b.	Unfortunately, there is not an alternative to newspaper publishing that would have the reach the Commission hopes to have with customers notices.
Cascade	
19.	The current 30-day notice as well as the required content for notices are appropriate. However, with a transition away from traditional media, including inserts, consideration should be given to digital mediums for reaching customers. A combination of email, text messaging, paid social media campaigns, and website content is more effective and representative of where customers go for information.
19a.	No.
19b.	Paid social media campaigns, along with email and text messages.
NW Natural	
19.	NW Natural has no specific responses to these questions at this time. The Company will participate in the upcoming workshop and reserves the right to provide additional comments on this topic after the workshop and after reviewing the written comments submitted.
19a.	<i>See above responses for response to 19a.</i>
19b.	<i>See above responses for response to 19b.</i>
PacifiCorp	
19.	PacifiCorp supports movement towards electronic communications to the extent possible in light of the changing expectations of customers. While the Company does not have specific recommendations at this time, the Company is looking into possible options and will participate in upcoming workshops and discussions regarding possible solutions for this topic.
19a.	<i>See above response for response to 19a.</i>
19b.	<i>See above response for response to 19b.</i>
PSE	
19.	<i>See below responses for response to 19.</i>
19a.	PSE uses traditional newspaper along with digital channels, including pse.com, MyPSE app, and email, to reach customers. Traditional newspaper remains a valuable asset to ensure all customers have the ability to see the notice, especially customers who do not use or opt into digital communication. In addition to traditional newspapers, optional digital channels enhance PSE's ability for customers to receive the information in an appropriate time and

	manner. PSE utilizes optional digital channels to ensure customers can access links provided to gain further details about PSE’s proposed filing or get information about the Commission’s open meeting.
19b.	In rural communities, PSE finds the best communication strategies include finding local bloggers; smaller online community news websites; coordinating with community organizations, local first responders and local jurisdictions; and coordinating town halls either in-person or via video.
Public Counsel	
19.	<i>See below responses to 19a and b.</i>
19a.	The Commission should expand the means by which customers are notified of electric and nature gas filings, and not necessarily eliminate an existing method. The content of the notices should also be expanded with assistance information and commission contact information.
19b.	Digital ads with trusted sources, notice or ads in local trusted sources, non-english adds based on customer demographics, automated phone calls, emails, or text messages, push notifications from utility smart phone apps.
TEP	
19.	No specific recommendation.
19a.	
19b.	

20. *Should the Commission require utilities to provide to the Commission a copy of any customer notice made in connection with a tariff filing before the notice is distributed to customers?*⁸

Question	Summary of Comments
Avista	
20.	No, they should not. The rules for customer notices are quite clear in the rule. Review and approval of basic customer notices by the Commission would add delay to the tariff filing process and additional work for the Commission.
Cascade	
20.	No. Cascade already works with Commission’s Consumer Protection section and Public Council in drafting general rate case notices, while notices for other tariff filings would delay the process which typically do not have a lot of lead time in putting together. In addition, Cascade already incorporates feedback from the Commission Staff and others and applies them within related upcoming notices, especially if they are routine filings.
NW Natural	
20.	No. NW Natural does not believe this additional administrative step is necessary or warranted from an administrative efficiency perspective. Currently, NW Natural provides notice under these rules with regard to a general rate case and its annual Purchased Gas Adjustment (PGA) filings. NW Natural already consults with Commission Staff and Public Counsel in developing the general rate case notice required by WAC 480-90-197 and as addressed in an applicable prehearing conference order. The notices for the PGA are provided in compliance with WAC 480-90-194(5) as bill inserts, bill messages and/or newsletters. The Company provides its bill inserts to the Commission monthly in compliance with WAC 480-90-103(8). Any issues with customer notices can be addressed in the Commission’s review of those monthly reports. The Company will participate in the upcoming workshop and reserves the right to provide additional comments on this topic after the workshop and after reviewing the written comments submitted.

⁸ See WAC 480-90-198(1) and WAC 480-100-198(1)

<i>PacifiCorp</i>	
20.	No. PacifiCorp does not recommend requiring an additional step in the customer notice process. The 30-day notice requirement in the rule already creates a rushed process for creating and distributing customer notices, and there is often very little room for additional review in printing and production timelines. In addition, a utility may voluntarily communicate with its customers regarding any relevant topic outside of Commission-required notices, and requiring this step will create additional burden and restrictions that will hinder customer service and customer relations.
<i>PSE</i>	
20.	Such a requirement is not necessary. PSE already voluntarily provides the Commission Staff on occasion with a copy before the notice is distributed to customers, especially if PSE has a specific question for the Commission Staff. PSE believes that there is a strong relationship and communication already in place with the Commission Staff for customer notices. The current WAC requirements are fairly clear on the necessary content of a customer notice, so PSE does not believe there is a compelling need for such a requirement. Also, utilities can already informally ask the Commission Staff questions regarding a specific customer notice in advance of it being distributed to customers, which is something that PSE has done several times in the past. If the Commission were to make such an additional requirement, it should be made clear that this is a required courtesy copy and the requirement should not slow down the utility's timeline to get the customer notice finalized for publication. The timelines are already exceptionally tight, and a new requirement of provision of a courtesy copy to the Commission prior to the distribution to customers should not create any extra days or delays in the utility's current timeline along with the risk of incurring additional costs.
<i>Public Counsel</i>	
20.	Yes, Public Counsel should also provide feedback.
<i>TEP</i>	
20.	The Energy Project suggests that it would be beneficial for customers if the Commission had an opportunity to review and edit customer notices of tariff filings prior to distribution.

21. *What can the Commission do to help ensure customers know about tariff filings and to help ensure that customers know about the Commission?*

Question	Summary of Comments
<i>Avista</i>	
21.	The majority of all customers do not want to know about most tariff filings, with the exception of those that increase rates. For those that increase rates, utilities are required to provide notice to customers, which Avista does by bill insert, 30-days before the rate change goes into effect. This notice is sufficient. In terms of customers knowing about the Commission, customers are made aware of the Commission through numerous avenues including the annual customer Rights and Responsibilities document they receive, customer notices, and both Past Due and Final Notices as described in Question 2 above.
<i>Cascade</i>	
21.	Cascade welcomes the opportunity to work with and help the Commission ensure customers know about the important mission that the Commission provides. In addition, Cascade currently provides all relevant information about tariff filings as required by Commission rules and regulations to our customers. However, ways Cascade ensures customers are aware of the services we provide is by survey our customers, partnerships, speaking at conferences, and other types of branding such as be active on social media, radio, and other media.

<i>NW Natural</i>	
21.	NW Natural has no specific response to this question at this time. The Company will participate in the upcoming workshop and reserves the right to provide additional comments on this topic after the workshop and after reviewing the written comments submitted.
<i>PacifiCorp</i>	
21.	Through various customer notices and communications, customers are sufficiently informed about the Commission and their multiple options to communicate with the Commission should the need arise. Low customer engagement in various Commission- and energy-related issues is not likely due to the lack of information.
<i>PSE</i>	
21.	The Commission's news releases about tariff filings generate media coverage and raise general awareness about these tariff filings that impact customers. A recommendation would be to have more areas within the UTC website to access the most recent filings.
<i>Public Counsel</i>	
21.	The Commission should require utilities to include information about the Commission and how to contact it in every notice. The Commission should also look into ways to expand its own independent outreach
<i>TEP</i>	
21.	No specific recommendation.