

December 1, 2020

VIA ELECTRONIC FILING

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Re: Docket U-200281—Response to Commission Request for Health and Economic Metrics to Consider for Ending Disconnect Moratorium

Avista Utilities, Cascade Natural Gas, NW Natural, PacifiCorp, and Puget Sound Energy (Joint Utilities) appreciate the opportunity to offer the following comments in response to the UTC Staff Proposed COVID-19 Response Term Sheet (Term Sheet), approved by the Commission in Order 01 of Docket U-200281 on October 20, 2020.

Specifically, the Joint Utilities respond here to item #1 under the Data and Reporting section of the Term Sheet. Item #1 requests that workgroup members submit suggested health and economic metrics for consideration by December 1, 2020, in order for the Commission to reassess the COVID-19 pandemic conditions in early February 2021. This information would inform any subsequent decisions by the Commission to end the disconnect moratorium on April 30, 2021, or to extend that date, as appropriate.

Before responding to the specific request regarding health and economic metrics, the Joint Utilities would first note that these metrics become less important as robust programs are put in place by the utilities to provide the safety net required to ensure all customers remain connected to vital electric and natural gas services. Therefore, the Joint Utilities would strongly urge the Commission to first consider each utility's readiness to support customers in need, independent of whatever health or economic conditions may be occurring in the first part of 2021, when deciding whether or not to extend the current disconnect moratorium beyond April 30, 2021.

As it relates to health and economic metrics, if the Commission required additional assurance beyond the utilities' readiness to provide aid to customers in need, the Joint Utilities believe that the disconnect moratorium for each utility should be allowed to end on April 30, 2021 if all counties in the utility's service area has reached Phase 4 in accordance with the State's Safe Start Guidelines by that time. As for the list of economic metrics noted in the Term Sheet, while they may seem appropriate in theory, gauging the appropriateness of specific metrics and benchmarks is too speculative a task to undertake at this time, particularly given the wide array of circumstances that may be present across the state next year. The Commission should instead use its informed judgement based upon the specific facts presented in the expected February 2021 meeting to inform, if at all, its decision to end the disconnect moratorium in any or all of the utilities' service areas.

We appreciate the opportunity to provide these comments and look forward to continuing the conversation between now and the ultimate conclusion of this moratorium. Please feel free to contact us if you have any questions.

Sincerely,

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