

**Exhibit No. \_\_\_\_ (RP-2)**  
**Docket U-111465**  
**Witness: Rayne Pearson**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY, INC.,**

**Respondent.**

**DOCKET U-111465**

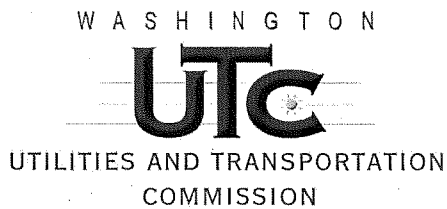
**EXHIBIT TO  
TESTIMONY OF**

**Rayne Pearson**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

***Staff Investigation Report, August, 2011***

**June 22, 2012**



# Investigation Report

## Puget Sound Energy

U-111465

Rayne Pearson  
Compliance Investigations

August 2011

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## PURPOSE, SCOPE, AND AUTHORITY

### **Purpose**

The purpose of this investigation is to determine whether Puget Sound Energy (PSE) is in compliance with WACs 480-90-128(6)(k) and 480-100-128(6)(k) related to disconnection of service.

### **Scope**

The scope of the investigation includes consumer complaint 111311, as well as data provided by PSE.

### **Authority**

Staff undertakes this investigation pursuant to the authority granted by the Revised Code of Washington (RCW) 80.01.040, which directs the commission to regulate gas and electric companies in the public interest. In addition, RCW 80.04.070 grants the commission authority to conduct such an investigation.

### **Staff**

Rayne Pearson, Compliance Investigator  
(360) 664-1111  
rpearson@utc.wa.gov

## EXECUTIVE SUMMARY

In consumer complaint 111311, filed in May 2011, staff found that PSE violated WAC 480-100-128(k) when it charged a customer a \$13 disconnect visit charge in connection with a visit to collect payment or leave a 24-hour notice. Staff determined a broader investigation was necessary to determine the frequency of disconnect visit charges for non-disconnect visits.

An investigation into the business practices of PSE established that the company is in violation of commission rules as follows:

- WACs 480-90-128(6)(k) and 480-100-128(6)(k) for charging a disconnect visit fee for non-disconnect visits.

### **Recommendation**

Staff recommends the commission issue a formal complaint and penalty of up to \$1,000 for each of the 1,639 violations of WAC 480-90-128(6)(k) and/or 480-100-128(6)(k), for a total penalty of up to \$1,639,000. Staff also recommends each of the \$13 disconnect visit fees charged in error be refunded to the 1,639 affected customers.

Staff will conduct a follow-up investigation.

## BACKGROUND

This investigation was prompted by consumer complaint 111311.<sup>1</sup> Consumer Protection staff forwarded the complaint to Compliance Investigations staff to determine whether PSE's practice of charging a \$13 disconnect visit fee for non-disconnect visits was widespread.

In consumer complaint 111311, PSE made a field visit to the customer's home on April 22, 2011, for the purpose of leaving a 24-hour disconnect notice or collecting payment from the customer. PSE billed the customer a \$13 disconnect visit charge for the visit. Consumer protection staff noted the violation as follows:

*WAC 480-100-128(6)(k) states that a utility may charge a fee for a visit to the service address if a utility representative is dispatched to disconnect service. Your response indicates the field staff was not at the residence to disconnect the service but to collect money or to leave a 24-hour notice. Since you say the staff was not there to disconnect the service, PSE cannot charge the \$13.00 fee. I have recorded one violation of the rule. PSE will need to credit the \$13.00 fee to the customer's account.*

PSE credited the customer's account accordingly.

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<sup>1</sup> A copy of consumer complaint 111311 is attached as Appendix A.

## INVESTIGATION

### Data Requests

Following a review of consumer complaint 111311, staff began a formal investigation into PSE's business practices related to charging disconnect visit fees for non-disconnect visits. In order to determine the extent and frequency these charges, on May 10, 2011, the commission sent PSE a data request requiring the following documents and information<sup>2</sup>:

1. A list of all customers (electric and natural gas) in Washington state who received field visits for a purpose other than disconnection (e.g., 24-hour payment notice) that were charged a \$13.00 disconnection fee in the month of April 2011.
2. For each customer listed, provide a document or worksheet that shows the complete statement of debit and credit activity for the period of April 1, 2011, through April 30, 2011. This includes late fees, current charges, pledges, payments, reconnect fees, disconnect fees, etc. and the balances owing after each application. Please separate the account histories by product (gas or electric), and by account number or address, if different.
3. The name, title, telephone number, and e-mail address of the PSE contact person that our staff can work with directly for questions that may arise concerning any details of the data.

PSE responded to the data request on June 3, 2011. The data provided by PSE indicated that 1,273 customers were charged a \$13.00 disconnect visit fee for a non-disconnect visit in the month of April 2011.<sup>3</sup> Based on the information provided, staff sent a second data request on June 7, 2011, requesting the following documents and information<sup>4</sup>:

1. A list of all customers (electric and natural gas) in Washington state who received field visits for a purpose other than disconnection (e.g., 24-hour payment notice) that were charged a \$13.00 disconnection fee in the months of March and May 2011.
2. The name, title, telephone number, and e-mail address of the PSE contact person that our staff can work with directly for questions that may arise concerning any details of the data.

PSE responded to the second data request on June 17. The data provided by PSE indicated that 366 customers were charged a \$13.00 disconnect visit fee for a non-disconnect visit in the month of May, and there were no non-disconnect visits performed in March.<sup>5</sup>

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<sup>2</sup> A copy of the May 10, 2011, data request is attached as Appendix B.

<sup>3</sup> A redacted copy of the spreadsheet submitted by PSE in response to the May 10 data request is attached as Appendix C.

<sup>4</sup> A copy of the June 7, 2011, data request is attached as Appendix D.

<sup>5</sup> A redacted copy of the spreadsheet submitted by PSE in response to the June 7 data request is attached as Appendix E.

**Findings**

WACs 480-90-128(6)(k) and 480-100-128(6)(k) provide, in part, that “the utility may charge a fee for the disconnection visit to the service address if provided for in the utility’s tariff.”

PSE’s Electric Tariff G, Schedule 80, General Rules and Provisions, Item 30, Disconnect Visit Charge, provides as follows:

DISCONNECT VISIT CHARGE—When a visit by a Company representative to the Customer’s service address for the purpose of disconnection does not result in disconnection of service, a service fee of \$13.00 will be charged for each visit when the visit does not result in a disconnection of service...

WACs 480-90-128(6)(k) and 480-100-128(6)(k) only permit charges for disconnect visits, and only if that charge is provided for in the company’s tariff. Charging a disconnect visit charge for a non-disconnect visit violates both the company’s tariff and WACs 480-90-128(6)(k) and 480-90-128(6)(k).

**Recommendation**

Staff recommends the commission issue a formal complaint and penalty of up to \$1,000 for each of the 1,639 violations of WAC 480-90-128(6)(k) and/or 480-100-128(6)(k), for a total penalty of up to \$1,639,000. Staff also recommends each of the \$13 disconnect visit fees charged in error be refunded to the 1,639 affected customers.



APPENDIX A

Consumer Complaint		Puget Sound Energy	111311
<b>Customer Info</b>			
Customer:	[REDACTED]	Primary Phone:	[REDACTED]
Contact:	[REDACTED]	Other Phone:	[REDACTED]
eMail Address:	[REDACTED]	Fax:	(bif) ore-10am
Privacy Confidential:	<input type="checkbox"/> Yes		
<b>Address</b>			
Service Address:	[REDACTED]	Mailing Address:	[REDACTED]
City, State, Zip:	[REDACTED]	City, State, Zip:	[REDACTED], WA
County:	[REDACTED]		
<b>Complaint Info</b>			
Class of Service:	<input checked="" type="radio"/> Residential <input type="radio"/> Business		
Complaint Group:	Disconnect <input type="checkbox"/> Lookup <input type="checkbox"/>	Complaint Keyword:	(None)
Company ID:	E702	Account Number:	876-320-214-9
Company Rep:	Stacey Hammond	Status: Closed as of:	06/05/2011
Res Email Address:	[REDACTED]	Initially Opened on:	05/02/2011
Agency Rep:	Sheri Hoyt	Quality Review:	<input type="checkbox"/> Done
Disputed Amount:	473.79	Closed on:	05/05/2011
Contacted How?	phone	Referral:	Other
Other Referral:			
Complaint Description:	<p>Customer made payment arrangements on her bill for April but was unable to keep them. She has received several disconnect notices and has been told that the company will be out to disconnect but no one will tell her on what date. Someone was out on 4/25 and didn't disconnect but it added \$13.00 to her bill. Customer was not in the state at the time, no one was in the residence, she doesn't know why PSE didn't just disconnect the service. Customer said a rep accepted a payment arrangement of \$184.81 by May 11, but then an hour later the company told her there was no such payment arrangement. Customer is asking for a four month arrangement of \$118.45 plus current charges with the first payment of \$193.87 to be paid by May 17, the due date for current charges of \$75.42. Customer said she's had a good pay history for a year, she got in trouble this winter when her roommates moved out and didn't pay her their half of the electric bill. She's trying to catch up now.</p> <p>*Please provide a bill history beginning January 2011.</p> <p>*Why didn't PSE disconnect when a tech was at her residence on April 25?</p> <p>*Is PSE willing to accept the customer's proposed payment arrangement? If not, what will it accept?</p> <p>5/2, 3:12pm)passed to PSE via e-mail. Response due 5/4, 5pm.</p>		
Results:	<p>Although the customer is not eligible for payment arrangements under PSE's policies as she is four months in arrears, PSE agreed to set up a four month arrangement. Customer is to pay four equal payments of \$118.45 in addition to current charges beginning with her next bill statement. Current charges of \$59.07 are due May 17.</p> <p>PSE reported the field staff did not disconnect the service when it was at her home on April 22 because the purpose of the visit was not to disconnect but to collect or leave a 24-hour notice. PSE credited the \$13.00 disconnect visit fee to the customer's account.</p>		
VIOLATION RECORDED - 1			

Washington UTC Complaint

111311

Company: Puget Sound Energy E702

Customer: Account# 878-320-214-9

Shannon R. Mahn

Contact:

1331 SE Rose Road

Port Orchard, WA 98367

Primary Phone: (360) 443-2334

Complaint: ~~XXXXXX~~

Serviced by: Shari Hoyt

Opened on: 05/02/2011

Grouped by: Disconnect

Closed on: 05/05/2011

Disposition: Consumer upheld

Description:



Customer made payment arrangements on her bill for April but was unable to keep them. She has received several disconnect notices and has been told that the company will be out to disconnect but no one will tell her on what date. Someone was out on 4/25 and didn't disconnect but it added \$13.00 to her bill. Customer was not in the state at the time, no one was in the residence, she doesn't know why PSE didn't just disconnect the service. Customer said a rep accepted a payment arrangement of \$184.81 by May 11, but then an hour later the company told her there was no such payment arrangement. Customer is asking for a four month arrangement of \$118.45 plus current charges with the first payment of \$193.87 to be paid by May 17, the due date for current charges of \$75.42. Customer said she's had a good pay history for a year, she got in trouble this winter when her roommates moved out and didn't pay her their half of the electric bill. She's trying to catch up now.

\*Please provide a bill history beginning January 2011.

\*Why didn't PSE disconnect when a tech was at her residence on April 25?

\*Is PSE willing to accept the customer's proposed payment arrangement? If not, what will it accept?  
5/2, 3:12pm)passed to PSE via e-mail. Response due 5/4, 5pm.

Results:

Although the customer is not eligible for payment arrangements under PSE's policies as she is four months in arrears, PSE agreed to set up a four month arrangement. Customer is to pay four equal payments of \$118.45 in addition to current charges beginning with her next bill statement. Current charges of \$59.07 are due May 17.

PSE reported the field staff did not disconnect the service when it was at her home on April 22 because the purpose of the visit was not to disconnect but to collect or leave a 24-hour notice. PSE credited the \$13.00 disconnect visit fee to the customer's account.

VIOLATION RECORDED - 1

Activity:

Activity Links

\*\*\* 05/03/2011 02:04 PM Email: Hoyt, Shari (UTC) << Hammond, Stacey B



Hi Shari,

Attached is the documentation for this complaint.

\*Please provide a bill history beginning January 2011. Response: I actually went back to November 2010 before remembering you had only requested back to January.

\*Why didn't PSE disconnect when a tech was at her residence on April 25?  
Response: The records show we were out there on the 22nd to collect or disconnect and left a 24 hour notice however, the notes on the account do not give a reason why the collector left a notice verses disconnecting. I sent an email to the Field collectors supervisor requesting they ask him if he remembers why. He may not remember as that was almost 2 weeks ago and it's possible they have gone to over at least 100 homes between then and now. According to the notes on the account from the call center, we were back out there again last Tuesday 4/26 and did not disconnect. I also asked the field supervisor to check with the collector on that date too. I will let you know what I find out.

\*Is PSE willing to accept the customer's proposed payment arrangement? If not, what will it accept? Response: The customer owes for 5 months, 4 months are past due. I went ahead and set up a 4 month installment plan on the past due amount of \$473.79. The first installment payment will be due with their next statement. If they make an installment payment this month with their current charges due 5/17, that is fine also. I attached a screen print of the installment plan. It's important the customer keep these arrangements as we will not revise them.

Thanks,  
Stacey

-SEE ATTACHMENTS-

\*\*\* 05/03/2011 03:48 PM Email: Hoyt, Sheri (UTC) >> 'Hammond, Stacey B'


 Stacey,

Thank you for your response. In Client Comments, can you tell me what this means:

4/22/2011 04-22-11 Per fir left 24/nt.....TomS


Thanks,  
Sheri

\*\*\* 05/03/2011 04:01 PM Email: Hoyt, Sheri (UTC) << Hammond, Stacey B

 Yes. The field rep (Tom S) called into the office and told the clerk that he left a 24 hour notice. She then entered the comment you saw on the client comments.

Stacey

\*\*\* 05/03/2011 04:06 PM Email: Hoyt, Sheri (UTC) >> 'Hammond, Stacey B'

 Thank you!

\*\*\* 05/04/2011 09:12 AM Email: Hoyt, Sheri (UTC) >> 'Hammond, Stacey B'

 Hi Stacey.

I have just one question on this one while we wait for the response from the field staff. Was there a \$13.00 disconnect charge added after the April 26

field visit?

Your response is due 5/9, 5pm.

Thanks,  
Sheri

\*\*\* 05/04/2011 09:26 AM Phone: Sheri Hoyt >> Customer



Called customer, I told her that although I haven't completed my investigation, I am waiting for additional information from PSE, I did want to let her know that PSE has accepted her payment arrangement proposal. Customer should pay her current charges of \$59.07 by the May 17 due date and the \$118.45 payments will begin with the charges due in mid-June. If she wishes to begin earlier, that's okay too. Customer was extremely appreciative of my assistance and thanked me numerous times. I told her I will be in touch with her in the next few days to let her know what I find out about the field staff's visit to her home and why she wasn't disconnected when no one was there.

\*\*\* 05/04/2011 09:47 AM Email: Hoyt, Sheri (UTC) << Hammond, Stacey B



Actually, I just received more information from the Field Lead. We did not go to the customer's home on the 26th so no, there is no \$13.00 charge. The account was showing Pending Credit Disconnect on the 26th when the customer called our call center however we did not get to her address on the 26th. Also as far as the 22nd, we were only collecting or leaving 24hour notices that Friday, not disconnecting which is why the customer's service was not disconnected.

Thanks,  
Stacey

\*\*\* 05/04/2011 10:43 AM Violation: 480-100-128(6)(k) -



VIOLATION: PSE stated that its representative was not dispatched to the customer's residence on April 22 to disconnect, but was there for the purpose of collecting or to leave a 24-hour notice. PSE can only charge a disconnect visit fee if the representative is dispatched to disconnect the service but does not.

The company was notified of the violation.

\*\*\* 05/04/2011 10:47 AM Email: Hoyt, Sheri (UTC) >> 'Hammond, Stacey B'



Hi Stacey,

WAC 480-100-128(6)(k) states that a utility may charge a fee for a visit to the service address if a utility representative is dispatched to disconnect service. Your response indicates the field staff was not at the residence to disconnect the service but to collect money or to leave a 24 hour notice. Since you say the staff was not there to disconnect the service, PSE cannot charge the \$13.00 fee. I have recorded one violation of the rule. PSE will need to credit the \$13.00 fee to the customer's account. Please let me know when that is done and then I believe we'll be ready to close this one.

Thanks,  
Sheri

\*\*\* 05/04/2011 10:49 AM Email: Hoyt, Sheri (UTC) << Hammond, Stacey B



Not a problem. I will credit the account \$13.00.

Thanks,  
Stacey

\*\*\* 05/04/2011 04:03 PM Email: Hoyt, Sheri (UTC) << Hammond, Stacey B



Hi,

Just letting you know I waived the \$13.00 disconnect visit fee.

Thanks,  
Stacey

\*\*\* 05/05/2011 08:12 AM Phone: Sheri Hoyt >> Customer



Called customer, I told her that the \$13.00 disconnect visit fee has been credited to her account because PSE was not out to disconnect but to collect or leave a 24 hour notice, therefore, it could not charge the fee. I informed her a violation was recorded because it charged her the fee initially. I also explained that the disconnect notice that is active on her account is held in abeyance for the period of her payment arrangement. Should she break the payment arrangement the disconnect comes back in play and the company does not need to notice her before disconnecting her service. The customer said she understood and thanked me for my help. I told the the customer I am closing her complaint today.

\*\*\* 05/05/2011 08:18 AM Email: Hoyt, Sheri (UTC) >> 'Hammond, Stacey B'



Hi Stacey.

This complaint is now closed. The disposition is Consumer Upheld. Please note that the Consumer Protection section has an internal quality review program and all closed complaints are subject to review and/or re-opening.

Thanks,  
Sheri

APPENDIX B



STATE OF WASHINGTON  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
(360) 664-1160 • TTY (360) 586-8203

May 10, 2011

Tom DeBoer  
Director, Rates and Regulatory Affairs  
Puget Sound Energy  
P.O. Box 97034  
MS: PSE-08N  
Bellevue, WA 98009-9734

Dear Mr. DeBoer:

The Utilities and Transportation Commission is conducting an investigation into the business practices of Puget Sound Energy (PSE) related to disconnection fees charged for field visits for reasons other than disconnection of service, such as delivering a 24-hour notice.

Under Washington state law, RCW 80.04.090, the commission has the right to inspect the accounts, books, papers and documents of any investor-owned electric or natural gas company doing business in this state.

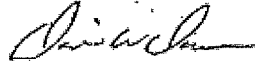
In order to complete this investigation, commission staff requires the following documents and information:

1. A list of all customers (electric and natural gas) in Washington state who received field visits for a purpose other than disconnection (e.g., 24-hour payment notice) that were charged a \$13.00 disconnection fee in the month of April 2011.
2. For each customer listed, provide a document or worksheet that shows the complete statement of debit and credit activity for the period of April 1, 2011, through April 30, 2011. This includes late fees, current charges, pledges, payments, reconnect fees, disconnect fees, etc. and the balances owing after each application. Please separate the account histories by product (gas or electric), and by account number or address, if different.
3. The name, title, telephone number, and e-mail address of the PSE contact person that our staff can work with directly for questions that may arise concerning any details of the data.

Tom DeBoer  
May 10, 2011  
Page 2

Please provide all requested documents and information by May 24, 2011. The response should be directed to Rayne Pearson, Compliance Investigator, Consumer Protection. Ms. Pearson can be reached at (360) 664-1111, or at [rpearson@utc.wa.gov](mailto:rpearson@utc.wa.gov). You may also contact Ms. Pearson if you have any questions regarding this data request.

Sincerely,



David W. Danner  
Executive Director and Secretary

cc: Michael Hobbs, Director, Operations

### APPENDIX C

Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
		Payment	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
No System Proc	4/11/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH



Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Other	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH

Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Payment	DVCH
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Disconnect	4/29/2011	Left 24 Hour Note	DVCH

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Disconnect	4/11/2011	Left 24 Hour Note	DVCH
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No System Protec	4/25/2011	Payment	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
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Disconnect	4/18/2011	Left 24 Hour Note	DVCH
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Disconnect	4/29/2011	Left 24 Hour Note	DVCH

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Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
No System Proc	4/29/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
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Disconnect	4/11/2011	Payment	DVCH
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Disconnect	4/29/2011	Left 24 Hour Note	DVCH
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Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
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Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
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Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
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Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
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Disconnect	4/25/2011	Payment	DVCH
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Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Payment	DVCH
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Disconnect	4/25/2011	Left 24 Hour Note	DVCH
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Disconnect	4/29/2011	Left 24 Hour Note	DVCH
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Disconnect	4/29/2011	Payment	DVCH

No System Proce:	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
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No System Proce:	4/11/2011	Payment	DVCH
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Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
No System Proce:	4/29/2011	Payment	DVCH
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Disconnect	4/25/2011	Left 24 Hour Note	DVCH
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Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Other	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
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Disconnect	4/18/2011	Left 24 Hour Note	DVCH
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Disconnect	4/18/2011	Left 24 Hour Note	DVCH
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Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH

Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Other	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
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Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
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Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/18/2011	Other	DVCH
Disconnect	4/25/2011	Payment	DVCH
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Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Other	DVCH
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Disconnect	4/18/2011	Other	DVCH
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Disconnect	4/29/2011	Left 24 Hour Note	DVCH

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Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	48 Hour Notice	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
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Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	48 Hour Notice	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
No System Proce	4/29/2011	48 Hour Notice	DVCH



Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
(blank)	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH

Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/18/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/29/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/18/2011	Payment	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH

Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/25/2011	Payment	DVCH
Disconnect	4/25/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Left 24 Hour Note	DVCH
Disconnect	4/11/2011	Payment	DVCH
Disconnect	4/15/2011	Left 24 Hour Note	DVCH
Disconnect	4/29/2011	Left 24 Hour Note	DVCH

APPENDIX D



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
(360) 654-1160 • TTY (360) 656-6203

June 7, 2011

Tom DeBoer  
Director, Rates and Regulatory Affairs  
Puget Sound Energy  
P.O. Box 97034  
MS: PSE-08N  
Bellevue, WA 98009-9734

Dear Mr. DeBoer:

The Utilities and Transportation Commission requests additional data related to an investigation into the business practices of Puget Sound Energy (PSE) related to disconnection fees charged for field visits for reasons other than disconnection of service, such as delivering a 24-hour notice.

Under Washington state law, RCW 80.04.090, the commission has the right to inspect the accounts, books, papers and documents of any investor-owned electric or natural gas company doing business in this state.

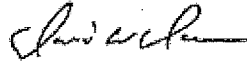
In order to complete this investigation, commission staff requires the following additional documents and information:

1. A list of all customers (electric and natural gas) in Washington state who received field visits for a purpose other than disconnection (e.g., 24-hour payment notice) that were charged a \$13.00 disconnection fee in the months of March and May 2011.
2. The name, title, telephone number, and e-mail address of the PSE contact person that our staff can work with directly for questions that may arise concerning any details of the data.

Tom DeBoer  
June 7, 2011  
Page 2

Please provide all requested documents and information by June 14, 2011. The response should be directed to Rayne Pearson, Compliance Investigator, Consumer Protection. Ms. Pearson can be reached at (360) 664-1111, or at [rpearson@utc.wa.gov](mailto:rpearson@utc.wa.gov). You may also contact Ms. Pearson if you have any questions regarding this data request.

Sincerely,



David W. Danner  
Executive Director and Secretary

cc: Michael Hobbs, Director, Operations















