

**Exh. JNS-25HCT
Docket UE-210829
Witness: Jaclynn N. Simmons
CONFIDENTIAL - REDACTED**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**PACIFICORP d/b/a PACIFIC POWER
AND LIGHT COMPANY,**

Respondent.

DOCKET UE-210829

CROSS-ANSWERING TESTIMONY OF

JACLYNN N. SIMMONS

**ON BEHALF OF STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

BCEIP Update

September 13, 2024

CONFIDENTIAL PER PROTECTIVE ORDER – REDACTED VERSION

TABLE OF CONTENTS

I. INTRODUCTION 1

II. PURPOSE AND SCOPE OF TESTIMONY 1

III. RESPONSE TO NVEC 2

IV. RESPONSE TO RNW 5

VI. RESPONSE TO CRITFC 11

LIST OF EXHIBITS

Exh. JNS-26C Staff Workpapers for Calculation of Hydro Purchases

Exh. JNS-27 Office of Financial Management Per Capita Personal Income by County

1 I. INTRODUCTION

2

3 Q. Are you the same Jaclynn N. Simmons who submitted testimony in this proceeding
4 on August 21, 2024, on behalf of the Washington Utilities and Transportation
5 Commission Staff (Staff)?

6 A. Yes.

7

8 Q. Have you prepared exhibits in support of your testimony?

9 A. Yes. Exhibits JNS 26C- 27.

10 Exh. JNS-26C - Staff workpapers for calculation of Hydro purchases

11 Exh. JNS-27 - Office of Financial Management Per capita personal income by county

12

13 II. PURPOSE AND SCOPE OF TESTIMONY

14

15 Q. Please state the purpose of your testimony.

16 A. The purpose of my testimony is to respond to certain findings and recommendations
17 contained in the testimonies of Northwest Energy Coalition (NVEC), Renewable
18 Northwest (RNW), and Columbia River Inter-Tribal Fish Commission (CRITFC).

19

20 Q. What is the scope of your testimony?

21 A. Staff will present its assessment on various aspects of each response testimony filed on
22 August 21, 2024. Regarding NVEC’s response testimony, Staff will discuss minimum
23 designations and program design relating to energy benefits and named communities.

1 Regarding RNW, Staff will discuss 2027 Biennial Clean Energy Implementation Plan
2 (BCEIP or Biennial Update) modeling concerns and the near-term Request for Proposals
3 (RFP). Regarding CRITFC, Staff will discuss the request for a five-year conservation
4 plan, the request for customer benefit indicators (CBIs), and PacifiCorp's hydro
5 purchases.

7 III. RESPONSE TO NVEC

8
9 **Q. What is the purpose of witness Thompson's testimony?**

10 A. The purpose of witness Thompson's testimony is to address how PacifiCorp can better
11 ensure that its named communities receive the benefits of clean energy resources, without
12 shouldering a disproportionate share of the burdens, as the Company works towards
13 compliance with the Clean Energy Transformation Act (CETA) by 2030. Witness
14 Thompson's testimony advocates for establishing minimum designations for distributed
15 energy resource (DER) programs to contribute to the equitable distribution of energy
16 benefits. She recommends that PacifiCorp follow the same guidelines as Puget Sound
17 Energy (PSE) to achieve these goals, with implementation set for the 2027 BCEIP
18 Update.¹ By setting this timeline, NVEC aims to address potential delays in delivering
19 clean energy benefits to Washington customers and ensure that PacifiCorp takes
20 proactive steps to meet equity goals outlined in CETA.

21

¹ Thompson, Exh. CT-1T, at 6:20-22.

1 **Q. Does Staff generally agree with witness Thompson’s minimum designation and**
2 **program design proposals?**

3 A. Yes, with one exception, as explained below.
4

5 **Q. Does Staff disagree with any portion of NWECC’s recommendation?**

6 A. In testimony, Staff argues that 27 percent of energy benefits should go to named
7 communities because the Company’s Biennial Update indicates that highly impacted
8 communities are 27.1 percent of their Washington customer base² and the Company
9 updated this 27.1 percent to 27.3 percent in response to data requests.³ This is what is
10 meant by the “minimum designation” percentage of energy benefits going to named
11 communities.

12 While Staff is open to setting a DER target for specific communities that exceeds
13 the Company’s estimate (witness Thompson proposes 30 percent), Staff would prefer the
14 minimum designation remain at 27 percent, as outlined in Staff’s response testimony.
15 Staff is comfortable with 27 percent as a “rounding” of the Company’s estimations of
16 both 27.1 and 27.3 percent. Setting a target higher than what PacifiCorp reports for its
17 service territory is ambitious, as this territory differs significantly from PSE’s, which
18 witness Thompson uses for comparison. Additionally, PSE’s percentages are closely
19 aligned to their actual data, which shows that 33 percent of all residential customers are
20 in high vulnerability block groups, 37 percent of their residential customers are in

² *In the Matter of PacifiCorp d/b/a Pac. Power & Light Co.’s Revised Clean Energy Implementation Plan*,
Docket UE-210829, PacifiCorp’s Revised 2021 Clean Energy Implementation Plan at 31 (March 13,
2023).

³ Simmons, Exh. JNS-22 at 1.

1 medium vulnerability block groups, and 34 percent are in low vulnerability block
2 groups.⁴ Therefore, the 30 percent target is more reflective of the conditions they have
3 identified in their region.

4 PSE differs from PacifiCorp in several ways: it serves over 500,000 customers,
5 operates in a different region of the state, and has a higher per-capita customer base. As a
6 result, programs and incentives should differ between the two companies. Given PSE's
7 larger customer base and higher per-capita rate, the administrative and cost impact would
8 be distributed among fewer customers in PacifiCorp's territory, which has a lower per-
9 capita customer base.⁵

10 Staff is concerned about the potential administrative and cost impact of requiring
11 the same process and documentation for both PSE and PacifiCorp. However, Staff
12 recognizes that the future outcomes for each service territory, as outlined in CETA, must
13 ultimately be the same. In conclusion, the 27 percent target is a reasonable starting point
14 and will be reviewed as the program evolves.

15
16 **Q. Has Staff changed any of its recommendations based on NWECC's testimony?**

17 Staff initially recommended implementation of the minimum designation and
18 program design in the 2025 CEIP in its response testimony. However, after reviewing
19 witness Thompson's testimony, Staff now revises its original recommendation,⁶

⁴ *In the matter of Puget Sound Energy's 2021 Clean Energy Implementation Plan*, Docket UE-210795, Redacted Final 2021 Clean Energy Implementation Plan (CEIP), consistent with the requirements of Order R-601, at 63 Figure 3-7, (December 17, 2021).

⁵ Simmons, Exh. JNS-27.

⁶ Simmons, Exh. JNS-1HCT, at 6:13-14.
Simmons, Exh. JNS-19, at 6:12.

1 extending the deadline to the 2027 Biennial Update to allow for additional time for
2 collaboration with advisory groups.

3
4 **Q. In sum, does Staff adopt NWEAC recommendations regarding Minimum Designations
5 and Program Design?**

6 A. Partially. Staff supports setting minimum designations at 27 percent, as expressed in its
7 response testimony, while adopting NWEAC's timeline as described above. However, if
8 the Commission adopts NWEAC's recommendation for Minimum Designations and
9 Program Design, Staff will support that decision.

10
11 **Does this conclude your response to NWEAC?**

12 A. Yes.

13
14 **IV. RESPONSE TO RNW**

15
16 **Q. What is the purpose of witness Ware's testimony?**

17 A. Witness Ware's testimony critiques PacifiCorp's Biennial Update for failing to establish
18 adequate interim clean energy targets and hindering progress under CETA. The testimony
19 raises concerns over the Company's inflated renewable resource cost assumptions⁷ and
20 reliance on unproven technologies like small modular reactors (SMRs) and hydrogen
21 peakers.⁸ Witness Ware recommends that the Commission reject these reduced targets

⁷ Ware, Exh. KW 1-T at 6:19-20 and 7:1-2.

⁸ Ware, Exh. KW 1-T at 16:9-14.

1 and uphold the original targets established in the 2021 Revised CEIP. Additionally,
2 witness Ware advocates for the initiation of a new resource procurement process to
3 ensure PacifiCorp meets its 2030 clean energy obligations, focusing on actionable
4 progress rather than speculative technologies.⁹

5
6 **Q. What modeling concerns does Witness Ware describe?**

7 A. Witness Ware states that the base capital costs (\$/kW) modeled by PacifiCorp for solar,
8 wind, and storage resources are higher than those assumed by the National Renewable
9 Energy Laboratory (NREL), other western utilities, and the California Public Utility
10 Commission (CPUC).¹⁰ [REDACTED]

11 [REDACTED]
12 [REDACTED].¹¹ According to witness Ware, these inflated costs could
13 lead to reduced investment in renewable resources, reductions to interim emission targets,
14 and a modeling bias in favor of future technologies that have yet to be demonstrated at
15 scale (e.g. small modular reactors and hydrogen peakers).

16
17 **Q. Does Staff agree with the assumption that an extra cost adder exists within the
18 Company's modeling?**

19 A. Staff has not yet confirmed that the Company is using a specific cost adder. However,
20 Staff is inquiring through data requests more information regarding this issue. Staff does

⁹ Ware, Exh. KW 1-T at 24:12-17.

¹⁰ Ware, Exh. KW-3 Fig 7.3-7.5.

¹¹ Ware, Exh. KW-1THC at 8:8-10.

1 agree that [REDACTED]
2 [REDACTED]¹² [REDACTED]
3 [REDACTED]¹³ [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]¹⁴

9 Given that the reduced interim targets in the Company’s Biennial Update can be
10 explained in part by its acquisition of renewable resources, PacifiCorp should undertake
11 all efforts to ensure the integrity, accuracy, and reliability of its modeling assumptions
12 used in the planning process.

13
14 **Q. Does Staff observe any differences between the modeling approach in the 2021 IRP**
15 **and the 2023 IRP update from PacifiCorp?**

16 A. Yes. [REDACTED]
17 [REDACTED]¹⁵ [REDACTED]
18 [REDACTED]

¹²Re in the Matter of PacifiCorp d/b/a Pac. Power & Light Co. 2023 IRP Update, Docket No. UE-200420, Highly Confidential and Confidential Integrated Resource Plan Workpapers, 200420-PAC-IRP2023DevelopEscalation(NRELhardcoded)Update2020ASRFP (C) at Summary (April 09, 2024).
¹³See id. at 8.
¹⁴ See id. at 8.
¹⁵ See id. at 11.

1
2
3
4
5
6

[REDACTED]

7 **Q. What is Staff’s recommendation regarding the costs of renewables in PacifiCorp’s**
8 **modeling?**

9 A. Staff does not recommend additional changes to the modeling contained in this Biennial
10 Update. However, it is the Company’s obligation to demonstrate how its forecasts align
11 with industry best practices during the development of its preferred portfolio and clearly
12 explain differences with comparable utility planning processes. Staff proposes that this
13 will most effectively be achieved during the development of the 2025 IRP and CEIP,
14 which will better inform any ensuing RFP, positioning the Company to acquire necessary
15 resources ahead of the CETA mandate.

16
17 **Q. Does Staff agree with witness Ware that the Commission should reject this filing**
18 **and have PacifiCorp uphold the targets settled on in October 2023?**¹⁶

¹⁶ *In the Matter of PacifiCorp d/b/a Pac. Power & Light Co.’s Revised Clean Energy Implementation Plan, Docket No. UE-210829, Order 06 Final Order Approving and Adopting Settlement Agreement; Approving CEIP Subject to Conditions at 8:43 (October 25, 2023).*

1 A. Yes. Staff’s primary recommendation is the full rejection of the Biennial Update and
2 urges the Commission to require PacifiCorp to adhere to the targets established in the
3 2021 Revised CEIP settlement.¹⁷
4

5 **Q. What does Staff think about witness Ware’s recommendation of ordering the**
6 **Company to start a near-term RFP?**

7 A. Staff has conveyed its concerns regarding the Company’s canceled 2022 ASRFP.¹⁸ Staff
8 concurs with witness Ware on the importance of initiating a new RFP in the near term but
9 emphasizes the need for assurance that it results in tangible progress through effective
10 resource procurement. In Staff’s testimony, Staff recommends that if the Commission
11 does not fully reject the BCEIP Update, it imposes a condition that prevents the Company
12 from suspending, canceling, or terminating its next RFP.¹⁹
13

14 **Q. Does Staff want to adopt or change any of its recommendations after witness Ware’s**
15 **testimony?**

¹⁷ See *id.* at 8.

¹⁸ *In the Matter of PacifiCorp d/b/a Pac. Power & Light Co. 2022 All-source Request for Proposals*, Docket UE-210979, Notice of Cancellation of PacifiCorp’s 2022 All-Source Request for Proposals (April 3, 2024); *In the Matter of PacifiCorp d/b/a Pac. Power & Light Co. 2022 All-Source Request for Proposals*, Docket UE-210979, Update to PacifiCorp’s 2022 All Source Request for Proposals Schedule (September 29, 2023).

¹⁹ Simmons, Exh. JNS-19.

1 A. No. Staff is not recommending ordering the initiation of resource procurement. Staff's
2 concerns remain that the Company could still cancel, terminate, or suspend its next AS
3 RFP, as was the case with the 2022 ASRFP.²⁰

4
5 **Q. What is the difference between Staff's requested remedy that the Company not**
6 **being allowed to cancel any post-2025 IRP RFP, and witness Ware's requested**
7 **remedy of ordering an RFP?**

8 A. Staff's recommendation in its response testimony is for the Commission to order
9 PacifiCorp to submit a plan in the event it does not start an RFP for the resources
10 identified in the 2022 ASRFP regarding what and how the Company will procure
11 identified resource needs. Staff also recommends that the Commission order that the
12 Company cannot cancel, suspend, or terminate the RFP associated with its 2025 IRP. It is
13 unclear whether witness Ware's near-term RFP would be based on the next IRP or the
14 identified resource needs from the canceled 2022 ASRFP. It appears that Witness Ware's
15 testimony is silent on what modeling assumptions the Company *should use* to acquire
16 resources.

17 Based on the Company's testimony,²¹ Staff believes that the Company will be
18 filing an All-Source RFP in conjunction with the filing of its next IRP, as required in
19 rule.²² Staff believes an RFP from the IRP process will be based on its most recently

²⁰ *In the Matter of PacifiCorp d/b/a Pac. Power & Light Co. 2022 All-source Request for Proposals*, Docket UE-210979, Notice of Cancellation of PacifiCorp's 2022 All-Source Request for Proposals (April 3, 2024).

In the Matter of PacifiCorp d/b/a Pac. Power & Light Co. 2022 All-Source Request for Proposals, Docket UE-210979, Update to PacifiCorp's 2022 All Source Request for Proposals Schedule (September 29, 2023).

²¹ Ghosh, Exh. RG-1T at 20:22-23.

²² WAC 480-107-009(2).

1 identified resources and needs. Staff believes that its recommendation ensures that the
2 Company completes an RFP, conducts a thorough analysis of bids, and can properly
3 evaluate bids if they are repriced or if economic conditions change.
4

5 **Q. Are there any issues or concerns that should be considered in future proceedings?**

6 A. Staff believes more time is warranted to review and interrogate PacifiCorp's modeling
7 cost assumptions for renewables as identified by witness Ware. Staff believes this process
8 should take place in the context of the Company's next 2025 IRP which is due on March
9 31, 2025, and in the Company's next CEIP due on October 1, 2025.²³
10

11 **Q. Does this conclude your cross-answering testimony for RNW?**

12 A. Yes.
13

14 **VI. RESPONSE TO CRITFC**
15

16 **Q. What is the purpose of witness Takala and witness DeCoteau's testimonies?**

17 A. The testimonies of Witness Takala and Witness DeCoteau focus on the impact of
18 PacifiCorp's energy practices on tribal rights and the environment. Witness Takala
19 emphasizes the historical and cultural importance of the Columbia River's fisheries to the

²³ WAC 480-100-625(1);WAC 480-100-640(1).

1 Yakama Nation and CRITFC member tribes, advocating for changes to the hydroelectric
2 system that would protect salmon populations and honor treaty rights from 1855.²⁴

3 Witness DeCoteau highlights CRITFC's Energy Vision for the Columbia Basin,
4 advocating for an energy system that balances the transition to renewable resources with
5 the protection of tribal rights, fish populations, and cultural resources. Witness DeCoteau
6 calls for direct involvement between PacifiCorp and tribal communities regarding energy
7 planning and policy decisions.²⁵

8
9 **Q. How heavily does PacifiCorp rely on the Bonneville Power Administration (BPA) to**
10 **meet its clean energy demands?**

11 A. PacifiCorp relies on the BPA for significant hydropower purchases to meet its clean
12 energy requirements. Data from the Company's 2023 and 2024 Clean Energy Progress
13 Reports indicate that PacifiCorp purchased from the BPA hydropower resources, with
14 Washington allocation, [REDACTED] [REDACTED]²⁶ [REDACTED] for
15 Washington and [REDACTED] [REDACTED]²⁷ [REDACTED] The
16 BPA-supplied Washington-allocated hydropower in 2022 represents [REDACTED] [REDACTED] of
17 PacifiCorp's total Washington-allocated hydropower purchases; for 2023, this percentage

²⁴ Takala, Exh. JT-1T at 3:8-12.

²⁵ DeCoteau, Exh. AKD-1T at 9:11-18.

²⁶ *In the Matter of PacifiCorp d/b/a Pac. Power & Light Co.'s Revised Clean Energy Implementation Plan*, Docket UE-210829, Confidential CEIP 2023 Progress Report at 2 Table 1 (July 3, 2022).

²⁷ *In the Matter of PacifiCorp d/b/a Pac. Power & Light Co.'s Revised Clean Energy Implementation Plan*, Docket UE-210829, Clean Energy Implementation Plan 2024 Progress Report at 3 Table 1 (July 1, 2023).

1 [REDACTED]²⁸ However, Staff did not independently confirm the accuracy of
2 these numbers with the Company, as they are solely derived from the work papers
3 submitted by the Company.²⁹ [REDACTED]

4 [REDACTED]³⁰ [REDACTED]

5 [REDACTED]

6 [REDACTED]³¹

7
8 **Q. Is the distribution of BPA’s hydropower equitable for the Indigenous populations in**
9 **the Company’s service area?**

10 A. PacifiCorp’s BPA hydropower purchases for 2022 and 2023 are allocated to Washinton
11 through the WIJAM. The Company has provided data that shows 6.2 percent³² of its
12 customers reside on tribal lands. Staff can only assume that 6.2 percent of the
13 Washington-allocated hydropower purchase would flow to tribal lands, though it is
14 difficult to measure the tribe’s share of the equitable benefits of clean energy provided by
15 the purchases from the BPA because not all Indigenous populations live on tribal lands.

16
17 **Q. Does Staff have any recommendations regarding hydropower?**

²⁸ Simmons, Exh. JNS-26C; *In the Matter of PacifiCorp d/b/a Pac. Power & Light Co. ’s Revised Clean Energy Implementation Plan*, Docket UE-210829, 210829-PAC-WP-2023-CEIP-Progress-Rpt-3(d)-3(e)-3(g)-4(b)(ii)-4(c) (C) (July 3, 2022); *In the Matter of PacifiCorp d/b/a Pac. Power & Light Co. ’s Revised Clean Energy Implementation Plan*, Docket UE-210829, 210829-PAC-WP-CEIP-3(d)-3(e)-3(g)-4(b)(ii)-4(c)-7-1-24 (C) (July 1, 2023).

²⁹ *See id.*

³⁰ Simmons, Exh. JNS-26C.

³¹ *See id.*

³² Simmons, Exh. JNS-22, at 2.

1 A. Not currently. Staff looks forward to more information on PacifiCorp’s past and future
2 collaboration with the Yakama Nation, Yakama Reservation, and nearby tribal
3 communities on these matters.
4

5 **Q. Witness DeCoteau requested that PacifiCorp be ordered to work with Yakama
6 Nation and CRITFC to develop CBIs, does Staff agree?**

7 A. Staff agrees that the Company should collaborate with Yakama Nation, CRITFC, and any
8 other Indigenous populations within its service territory to develop CBIs, as the rule³³
9 mandates an equitable distribution of energy and non-energy benefits to vulnerable
10 populations and highly impacted communities. The rules also require CEIPs to include
11 customer benefit data and proposed CBIs.³⁴
12

13 **Q. What are Staff’s thoughts on imposing a 5-year Conservation plan for energy
14 efficiency and low-income weatherization programs specific to Yakama Reservation
15 and tribal communities nearby?**

16 A. Witness DeCoteau’s testimony discusses an assessment specific to the “Yakama
17 Reservation and tribal communities nearby.”³⁵ Staff notes that a general assessment of
18 energy efficiency across the service territory is completed in the context of the Biennial
19 Conservation Plan³⁶ (BCP) and through the Energy Independence Act (EIA).³⁷ The

³³ WAC 480-100-610(4)(i)(ii).

³⁴ WAC 480-100-640(4) (a-c).

³⁵ See *id.* at 15:6-11.

³⁶ WAC 480-109-120.

³⁷ RCW 19.285.

1 development of the plan must include public participation in the development of the ten-
2 year conservation potential and biennial conservation target, including biennial program
3 details, program budgets, and cost-effectiveness calculations.³⁸ However, improving it in
4 the specific interest of Yakama Nation, the reservation, and nearby tribal communities
5 aligns with CETA and Staff's position in other filings, as explained in more detail below.

6 Staff does not oppose a specific carve-out for the Yakama Reservation and the
7 tribal communities nearby within the conservation plans, reports, and annual filings.
8 CETA requires an equitable distribution of energy and non-energy benefits³⁹ to
9 vulnerable populations and highly impacted communities, including consultation with
10 community-based organizations and Indian tribes.⁴⁰ Staff believes there is justification to
11 include a section for the Yakima Nation, Reservation, and other tribal communities.

12 Further, PacifiCorp estimates that 6.2 percent of its customers are on tribal
13 lands.⁴¹ For example, 6.2 percent out of approximately 130,000 customers, results in
14 approximately 8,060 customers on tribal lands. Staff emphasizes that this is merely a
15 Company-generated estimate in response to a data request, and it does not include
16 Indigenous populations living off tribal lands.

17 In sum, Staff would not oppose additional processes and requirements specific to
18 the Yakama Nation and nearby tribal communities, within the existing conservation plan
19 process, as doing so seems fundamental to the objectives of CETA.

³⁸ WAC 480-109-120(3); WAC 480-109-120(4).

³⁹ RCW 19.405.060(1)(c)(iii).

⁴⁰ RCW 19.4-5.020(22); RCW 19.405.020(39) (a-b); RCW 19.405.120(4)(a)(ii); WAC 480-100-640(4)(a).

⁴¹ Simmons, Exh. JNS-22.

1 **Q. How does Staff envision effective and equitable public participation in response to**
2 **CRITFC's requests?**

3 A. Staff visualizes an inclusive approach to engagement to be pursued through proper
4 representation at advisory group meetings, or a mutually agreed-upon process between
5 PacifiCorp, the Yakama Nation, and other adjacent tribal governments, individuals, and
6 organizations. These discussions would cover CEIP topics and the BCP, and these
7 discussions will help the Company better address the needs of its consumers, and result in
8 the most effective measures.

9 There are advisory group requirements for the CEIP and conservation process
10 under rule and statute.⁴² These rules require input from the utility's customers and
11 advocacy groups.

12
13 **Q. Does Staff want to add to its recommendation to the Commission after reviewing**
14 **CRITFC's concerns?**

15 A. Yes. Even if the Commission fully rejects the Biennial Update, Staff recommends that
16 PacifiCorp be required to include participation and feedback from Yakama Nation, and
17 other adjacent tribal governments, individuals, and organizations, in its CEIP and BCP
18 planning process, and submit proof that it has made reasonable efforts to do so. This
19 could involve participation in key advisory groups such as the Company's Demand-Side
20 Management Advisory Group (DSM AG) and Equity Advisory Group (EAG). However,
21 Staff understands that Native nations are given unique status as the only community that

⁴² WAC 480-100-655; RCW 19.405.120(4)(a)(iii).

1 is explicitly named in CETA.⁴³ Staff recommends that this process be agreed upon by the
2 Company and the other entities.

3 Additionally, the Company should be intentional when requesting feedback,
4 ensuring adequate timelines for due dates are communicated, and that space is held
5 within the process for these entities to communicate their priorities, even if they are not
6 on the Company's agenda. Staff points to witness Harmon's testimony in the 2024 Puget
7 Sound Energy general rate case for further suggestions.⁴⁴

8 Furthermore, the Company should be required to work with the Yakama Nation
9 and CRITFC to develop CBIs that help identify the needs of the Indigenous populations
10 within their respective service territory.

11
12 **Q. Does this conclude your testimony?**

13 **A. Yes.**

⁴³ RCW 19.405.120(4)(a)(ii), RCW 19.405.020(23), WAC 480-100-640(4)(a), WAC 480-100-655(1)(b), WAC 480-100-605.

⁴⁴ *Wash. Utils. & Transp. Comm'n v. Puget Sound Energy*, Docket UE-240005, Testimony of Byron L. Harmon at 36:11-38:13 (Aug. 6, 2024).