

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED: April 26, 2016                      WITNESS: Jason Ball  
DOCKET: UE-152253                                      RESPONDER: Jason Ball  
REQUESTER: Pacific Power & Light                      TELEPHONE: (360) 664-1279

**REQUEST NO. 41:** Refer to Ball, Exh. No. JLB -1T 48:18-21. Please provide and describe the analyses and data collection Staff performed in comparing Pacific Power's low income DSM expenditures as a percentage of total residential DSM expenditures with other utilities.

**RESPONSE:** Staff has not performed this analysis.

In analyzing the Company's decoupling proposal, Staff used the elements and criteria stated in the Commission's Decoupling Policy Statement. Specifically, the fourth criterion discusses low income conservation funding:

*Low-income.* A utility proposing a full decoupling mechanism must demonstrate whether or not its conservation programs provide benefits to low-income ratepayers that are roughly comparable to other ratepayers and, if not, it must provide low-income ratepayers targeted programs aimed at achieving a level of conservation comparable to that achieved by other ratepayers, so long as such programs are feasible within cost-effectiveness standards.

Ball, Exhibit No. JLB -1T 42:12-18. However, the Company has not, to my knowledge, performed the referenced analysis either. Therefore, as stated in my direct testimony:

Because the Company has not shown that its low-income program is achieving a reasonable level of success in meeting the conservation needs of its low-income customers, Staff recommends that low income conservation funding be increased by \$50,000. In a future rate filing, the total funding for low-income conservation can be adjusted depending upon demonstrated need.

Ball, Exhibit No. JLB -1T 49:5-9.