

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. 43: Refer to Ball, Exh. No. JLB -1T 48:18-21. Please provide and describe the analyses and data collection Staff performed for any other comparison of Pacific Power's low income conservation spending metrics in comparison with other utilities, such as expenditures per residential customer, etc. Did Staff compare the overall spending on residential efficiencies between Pacific Power and Avista in relation to the number of electric residential customers served?

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, criteria four 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, to my knowledge, has not performed such an analysis. 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.