

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: January 5, 2018

WITNESS: Jennifer E. Snyder

DOCKET: UE-170485/UG-170486

RESPONDER: Jennifer E. Snyder

REQUESTER: The Energy Project

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REQUEST NO. 3:

Re: Testimony of Jennifer E. Snyder, Exh. JES-1T at 24:7-9.

Jennifer Snyder states in her testimony that “Staff sees no reason not to allow these [Community Action Partnership (CAP)] agencies to fund low-income fuel conversion in cases when it is in the best interest of the low-income customer.”

- a. Does this recommendation mean that the CAP agencies would be permitted to continue to use funding generated under the conservation tariff rider for low-income fuel conversion? If not, please explain why not.
- b. If the answer to part (a) is no, please state what funding source Staff recommends should be used by the CAP agencies to fund low-income fuel conversion.
- c. If the answer to part (a) is no, is it Staff’s position that it is unlawful to provide low-income fuel conversion under the conservation tariff rider, or that is not preferable as a matter of policy.

RESPONSE:

- a.-b. The recommendation that CAP agencies be allowed to continue fuel conversions for low-income customers is not prescriptive in funding source. Continuing this service for low-income customers under the conservation rider is one option that Avista and/or The Energy Project might propose. Another option Staff has identified is moving funding to the LIRAP tariff, Schedule 92/192.¹ Staff encourages the company and TEP not to limit possible funding sources only to the options identified by Staff.
- c. On the issue of recovering costs of low-income fuel conversion through the conservation tariff rider, Staff refers to the following Commission statement:

Though we express our clear preference against the recovery of non-conservation costs from these tariffs, we see no need for a rigid rule prohibiting it. As PSE points out, in fact-specific circumstances we have allowed the recovery of non-conservation costs through these tariffs. Nothing in this rule prohibits the recovery of non-conservation costs through these adjustments, so there is no need to modify the proposed rules as PSE suggests.²

¹ Docket UE-171091 December 20, 2017, open meeting memo.

² In the Matter of Amending, Adopting, and Repealing Rules in WAC 480-109 Relating to the Energy Independence Act. Docket UE-131723 General Order R-578 ¶ 72.