

Exh. PK-2
UE-240004/UG-240005/UE-230810
Witness: Paul Koenig

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**DOCKETS UE-240004,
UG-240005 and UE-230810
(Consolidated)**

EXHIBIT TO TESTIMONY OF

PAUL KOENIG

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE Response to Staff Data Request No. 54

August 6, 2024

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-240004 & UG-240005
Puget Sound Energy
2024 General Rate Case**

WUTC STAFF DATA REQUEST NO. 054:

REQUESTED BY: Paul Koenig

RE: Demand Response

Witness Archuleta states: “The remaining programs **not** short-listed in the 2022 DER RFP did extensively overlap in targeted customer segments.” Archuleta, Exh. GA-1T at 7:15-16 (emphasis added). Did PSE consider selecting bidders with overlapping customer segments? How did PSE determine if the overlap was significant enough to keep a program off the short-list?

Response:

Yes, Puget Sound Energy selected some overlap for Commercial & Industrial demand response.

However, for residential demand response, customers enroll thermostats through the thermostat manufacturer, not the aggregator. Due to this, the overlap in which a number of residential demand response bids targeted the same customer thermostats was considered significant enough to narrow the programs for the short-list.