

**Exh. PK-3
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. 62

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. 062:

REQUESTED BY: Paul Koenig

RE: Demand Response

Witness Archuleta states that PSE's programs are "intended to provide over 30 percent of energy benefit to named communities customers." Archuleta, Exh. GA-1T at 10:15-16.

- a. How does PSE define and measure energy benefit?
- b. How will PSE provide energy benefit to named communities customers specifically?
- c. How is PSE working with the selected third party implementers to provide energy benefit to named communities customers?
- d. Are there programs that are not available to all PSE customers and only available to named communities customers? If so, please list these programs.
- e. Is named communities customer Demand Response participation measured independently from other customers' participation? Please explain why or why not.

Response:

- a) Energy benefit is measured through peak curtailment during a Demand Response ("DR") event measured in MWs as well as incentives paid to customers.
- b) Puget Sound Energy ("PSE") is providing energy benefit to named community ("NC") customers by building in NC support requirements in DR aggregation contracts. PSE is also developing targeted marketing and connected technology device provisioning.
- c) PSE is coordinating the launch of additional programs, which will be available to all customers. PSE will analyze participation and energy benefit distribution amongst customers enrolled in named communities.

- d) No, all programs are available to all customers who meet eligibility requirements (i.e., those with AMI meter installed and who heat or cool their home with PSE electricity).
- e) NC participation is measured by matching PSE customer classifications to the event performance data that PSE's third-party DR implementers (Enel, Uplight (previously AutoGrid) and Opower) provide. PSE then can report on curtailment in MWs by NC customers alongside the percentage of total curtailment that their participation, curtailment, and incentives represent.