

**Exh. BLH-12
UE-240004/UG-240005/UE-230810
Witness: Byron Harmon**

**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

BYRON LLOYD HARMON

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE Response to Staff Data Request No. 193

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. 193:

REQUESTED BY: Byron Harmon

RE: Equity

In the Direct Testimony of Troy A. Hutson, Exh. TAH-1T, page 33, Figure 6, under the heading “Strategic Goals” PSE names “Meet regulatory commitments” as a strategic goal. On page 32, PSE states, “PSE has set the goal of directing at least 30 percent of clean energy benefits (in addition to those required under CETA) flowing to Named Communities.” Please answer the following questions:

1. What is PSE’s goal with respect to meeting regulatory commitments, and explain the purpose of this goal?
2. What is PSE’s goal with respect to directing at least 30 percent of clean energy benefits to Named Communities, and explain the purpose of PSE’s goal?
3. Please harmonize the goal stated on page 32 with the strategic goal of meeting regulatory commitments.

Response:

Puget Sound Energy (“PSE”) objects to WUTC Staff Data Request No. 193 to the extent it requests information that is publicly available or obtainable from some other source that is more convenient, less burdensome, or less expensive. Notwithstanding these objections, and subject thereto, PSE responds as follows:

1. The purpose of this goal is to set the foundation and basis for ensuring clean energy benefits flow to Named Communities. PSE is committed to meeting its regulatory commitments. Please refer to the Prefiled Direct Testimony of Troy A. Hutson, Exh. TAH-4 for the equity-related requirements from PSE’s 2022 general rate case and the Fourth Exhibit to the Prefiled Direct Testimony of Troy A. Hutson, Exh. TAH-5, for PSE’s Clean Energy Implementation Plan (“CEIP”) equity requirements.

PSE is taking a similar approach when operationalizing energy equity to ensure PSE is incorporating energy equity in other parts of its operations.

2. PSE defined that objective / outcome to meet the Commission's requirement from PSE's CEIP final order, which set a minimum designation of 30% of energy benefits of its Distributed Energy Resource ("DER") solar, DER storage, Demand Response, and Energy Efficiency programs.¹

This also provides a reference point for employees when setting goals or outcomes in other programs or business areas, such as in delivery system investments and the Targeted Electrification Pilot, as detailed in PSE's Response to WUTC Staff Data Request No. 165.

3. Directing 30 percent of clean energy benefits to Named Communities is one of the desired outcomes when evaluating how successful PSE is in ensuring equitable distribution of benefits and reduction of burdens to Named Communities. To achieve that outcome, PSE needs to be able to meet the three strategic goals, which are 1) meet PSE's regulatory commitments (related to energy equity), 2) operationalize equity, and 3) strengthen partnerships and enhance engagement.

¹ PSE CEIP Final Order UE-210795 ¶ 278, Condition 20 (June 6, 2023)