

**Exh. HEN-6
Dockets UE-220066, UG-220067,
UG-210918
Witness: Hanna E. Navarro**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**DOCKETS UE-220066, UG-220067,
UG-210918 (consolidated)**

In the Matter of the Petition of

PUGET SOUND ENERGY

**For an Order Authorizing Deferred
Accounting Treatment for Puget Sound
Energy's Share of Costs Associated with
the Tacoma LNG Facility**

EXHIBIT TO TESTIMONY OF

HANNA E. NAVARRO

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE Response to UTC Staff Data Request No. 284

July 28, 2022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-220066 & UG-220067
Puget Sound Energy
2022 General Rate Case**

WUTC STAFF DATA REQUEST NO. 284:

REQUESTED BY: Hanna Navarro

Re: Capital Planning

Did PSE evaluate current inequities in developing this Multiyear Rate Plan (MYRP)? Please answer yes or no. If yes, please provide documentary evidence that demonstrates that this evaluation occurred as part of developing the MYRP proposed by PSE.

Response:

Puget Sound Energy (“PSE”) objects to WUTC Staff Data Request No. 284 to the extent the phrase “current inequities” is vague and ambiguous. Without waiving this objection and subject thereto, PSE provides the following response.

Yes. PSE addressed issues related to equity and inequity in developing the multiyear rate plan (“MYRP”). PSE’s MYRP is consistent with the public interest as described in RCW 80.28.425, including equity, even though the statute does not require a utility to specifically evaluate equity in developing the MYRP. Rather, the statute provides that the Washington Utilities and Transportation Commission (“the Commission”) *may consider* equity as a factor when determining if a MYRP is in the public interest when deciding whether or not to approve it.

Specific to the request for “documentary evidence that demonstrates that this evaluation occurred as part of developing the MYRP” and in light of the fact that this is not required by the statute, PSE has addressed the manner in which equity was considered in the development of the MYRP in prefiled direct testimony and in other discovery responses (as of the time of this response), which document the outcomes of these evaluations and include evidence in appendices and or attachments to data requests as appropriate. PSE provides a categorized summary table below of testimony and data request responses from which further information responsive to this data request can be found. The entries in the below table are meant to be a comprehensive list but may not have captured all places where the addressing of inequities has been discussed.

PSE is committed to working with the Commission to define and evaluate inequities as additional guidance is provided by the Commission and PSE's MYRP is reviewed and approved. Likewise, PSE is committed to continuing to develop knowledge, data, and processes to identify and address perceived inequities throughout the MYRP period and in the future, prudently adjusting and reevaluating with new information in order to deliver customer benefits that are most valuable.

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References	Page Number(s)
<i>Integrated Resource Planning</i> includes foundational Economic, Health and Environmental Benefits Assessment to define highly impacted communities and vulnerable populations, defining and incorporation of customer benefit indicators for preferred portfolio.	
Chapter 2, "Clean Energy Action Plan"	2-4 through 2-5
Appendix K	All of Appendix K
<i>Clean Energy Implementation Plan ("CEIP")</i> includes further defining and applying customer benefit indicators, input from Equity Advisory Group and stakeholders, and future commitments.	
Prefiled Direct Testimony of Adrian J. Rodriguez, Exh. AJR-1T	31-33
Prefiled Direct Testimony of Josh J. Jacobs, Exh. JJJ-1T	16
Prefiled Direct Testimony of Josh J. Jacobs, Exh. JJJ-3	63-120
Chapter 4 "Specific Actions"	122-137
Chapter 3, "Highly Impacted Communities and Vulnerable Populations, and Customer Benefit Indicators"	48-103
Chapter 8, "Future Commitments"	233-237
<i>Low Income Customer Programs</i> includes current billing and payment programs including Crisis-Affected Customer Assistance Program, cash payment transformation, Arrearage Management Program, and the Billing Discount Rate proposal.	
Prefiled Direct Testimony of Carol L. Wallace, Exh. CLW-1T	21:11-25:13; 34:8-35:10; 25:14-26:11; 29:11-31:13 9:6-21:10;
Prefiled Direct Testimony of Carol L. Wallace, Exh. CLW-6	4
Prefiled Direct Testimony of Carol L. Wallace, Exh. CLW-7	2
Prefiled Direct Testimony of Carol L. Wallace, Exh. CLW-9	4
Prefiled Direct Testimony of Birud D. Jhaveri, Exh. BDJ-1T	70-84
Prefiled Direct Testimony of Birud D. Jhaveri, Exh. BDJ-12	108-366
PSE's Response to TEP DR 55	Response

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References	Page Number(s)
<i>Energy Burden Analysis</i> includes insights to PSE’s low-income customer base and energy burdens and how this informs programs.	
Prefiled Direct Testimony of Birud D. Jhaveri, Exh. BDJ-1T	59-70
Prefiled Direct Testimony of Birud D. Jhaveri, Exh. BDJ-11	Exhibit
Prefiled Direct Testimony of Birud D. Jhaveri, Exh. BDJ-12	1-107
PSE’s Response to TEP DRs 45-47	Response
PSE’s Response to TEP DRs 53-54	Response
<i>Diversity, Equity, and Inclusion Playbook</i> includes commitment across customers, community, suppliers, and employees.	
Prefiled Direct Testimony of Adrian J. Rodriguez, Exh. AJR-1T	39-40
PSE’s Response to WUTC DR 062	Attachment A
PSE’s Response to WUTC DR 161	Attachment A
PSE’s Response to WUTC DR 248	Attachment A
<i>Transportation Electric Programs</i> includes products and services design input from many equity focused groups, community engagement plans and feedback to shape tariff schedules; targeted spend to DEI.	
Prefiled Direct Testimony of Will T. Einstein, Exh. WTE-1CT	51:2-6; 38; 52
PSE’s Response to WUTC DR 51	Attachment A; B
PSE’s Response to WUTC DR 93	Attachment A
PSE’s Response to NWEK DR 96	Attachment A
Tariff schedule filed in Docket UE-220294	Tariff
<i>Distributed Energy Resource (“DER”) Programs</i> includes programs that directly support the DER preferred portfolio that promotes equity.	
Prefiled Direct Testimony of Will T. Einstein, Exh. WTE-1CT	59-74
<i>Product Development</i> includes customer outreach to inform product services.	
Prefiled Direct Testimony of Will T. Einstein, Exh. WTE-1CT	6
PSE’s Response to WUTC DR 43	Response
PSE’s Response to WUTC DR 45	Response
PSE’s Response to NWEK DR 67	Response
<i>Time Varying Rates Pilot</i> includes systematic inclusion of low income customers, Equity Advisory Group and Low-Income Advisory Committee feedback on Energy Burden Analysis.	
Prefiled Direct Testimony of Dr. Ahmad Faruqui, Exh. AF-1T	2:17-18 Figure 9 24:5-6
PSE’s Response to NWEK DR 096	Attachment A
<i>Capital Planning</i> includes current and future processes relative to equity	
Prefiled Direct Testimony of Catherine A. Koch, Exh. CAK-1T	23-24
Prefiled Direct Testimony of Dan’l R. Koch, Exh. DRK-1T	2; 26; 28-29
PSE’s Response to WUTC DR 73	Attachment A-R
PSE’s Response to WUTC DR 74	Attachment A-I

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<i>Capital Planning (continued)</i>	
PSE's Response to WUTC DR 75	Attachment A;B
PSE's Response to WUTC DR 76	Attachment A-G
PSE's Response to WUTC DR 78	Response
PSE's Response to WUTC DR 79	Attachment A
PSE's Response to WUTC DR 80-83	Response
PSE's Response to WUTC DR 84-85	Response
PSE's Response to WUTC DR 86	Attachment A
PSE's Response to WUTC DR 87	Attachment A
PSE's Response top WUTC DR 88-89	Response
PSE's Response to WUTC DR 112	Response
PSE's Response to WUTC DR 157	Attachment A-N
PSE's Response to WUTC DR 158	Attachment A
PSE's Response to WUTC DR 160	Response
PSE's Response to WUTC DR 194	Attachment A-C
PSE's Response to WUTC DR 195	Response
PSE's Response to WUTC DR 250	Attachment A
<i>Procurement Practices includes diversity of supplier base.</i>	
Prefiled Direct Testimony of Dawn M. Reyes, Exh. DMR-1T	32-33
PSE's Response to WUTC DR 135	Attachment A; B; C
<i>Facilities Planning includes rebuilding and siting of operating bases.</i>	
PSE's Response to WUTC DR 133	Attachment A
PSE's Response to WUTC DR 134	Response
PSE's Response to WUTC DR 180	Attachment A
<i>Energize Eastside includes use of existing corridor and eliminate blackouts to ensure security and resilience.</i>	
PSE's Response to WUTC DR 95	Attachment A
<i>Grid Modernization and Reliability includes direct support and enabling CEIP DERs as they are pursued with equity and customer benefit indicators, evaluating reliability by circuits.</i>	
Prefiled Direct Testimony of Catherine A. Koch, Exh. CAK-5	21-24
Prefiled Direct Testimony of Catherine A. Koch, Exh. CAK-5	Appendix C
PSE's Response to WUTC DR 73	Attachment C
PSE's Response to WUTC DR 113	Response
PSE's Response to WUTC DR 129	Response
PSE's Response to WUTC DR 289	Attachment A
<i>Advanced Metering Infrastructure includes customer benefits to directly enable CETA</i>	
Prefiled Direct Testimony of Catherine A. Koch, Exh. CAK-7	Appendix B
Prefiled Direct Testimony of Catherine A. Koch, Exh. CAK-7	Appendix C 5-13

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<i>Advanced Metering Infrastructure (continued)</i>	
Prefiled Direct Testimony of Sanem I. Sergici, Exh. SIS-1T	7-8
Prefiled Direct Testimony of Sanem I. Sergici, Exh. SIS-3	17-19; 23
PSE's Response to WUTC DR 188	Response
PSE's Response to WUTC DR 189	Response
PSE's Response to WUTC DR 191	Response
<i>Performance Metrics includes criteria considered and specific equity measures</i>	
Prefiled Direct Testimony of Mark N. Lowry, Exh. MNL-1T	19, 21, 47
Prefiled Direct Testimony of Mark N. Lowry, Exh. MNL-3	52, 56, 66
Prefiled Direct Testimony of Catherine A. Koch, Exh. CAK-1T	51-53
PSE's Response to WUTC DR 111	Response
PSE's Response to WUTC DR 163	Attachment A
PSE's Response to WUTC DR 164	Response
PSE's Response to WUTC DR 165-166	Attachment A
PSE's Response to WUTC DR 244	Attachment A
PSE's Response to WUTC DR 246	Attachment A; B
PSE's Response to WUTC DR 247	Response
PSE's Response to TEP DR 23	Response
PSE's Response to PC DR 160	Response
<i>Project Execution includes current procurement of services practices and future process considerations.</i>	
Prefiled Direct Testimony of Roque B. Bamba, Exh. RBB-1T	10
PSE's Response to WUTC DR 252	Attachment A
<i>Power Costs / All Source RFP include awareness of CETA and equitable transition to clean energy considerations.</i>	
Prefiled Direct Testimony of Colin P. Crowley, Exh. CPC-1HCT(R)	59
PSE's Response to WUTC DR 40	Response