

**EXH. AEW-9
DOCKETS UE-220066/UG-220067
2022 PSE GENERAL RATE CASE
WITNESS: AMY E. WHEELLESS**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**Docket UE-220066
Docket UG-220067**

**EIGHTH EXHIBIT (NONCONFIDENTIAL) TO
THE PREFILED RESPONSE TESTIMONY OF**

AMY E. WHEELLESS

**ON BEHALF OF NW ENERGY COALITION, FRONT AND CENTERED, AND
SIERRA CLUB**

JULY 28, 2022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

NWEC DATA REQUEST NO. 125:

REQUESTED BY: Jaimini Parekh

Re: PIM

Regarding PSE's proposed transportation electrification PIM, "[T]he Company will not be positioned to propose specific targets and sharing percentages until later in the first quarter of 2022" (Lowry testimony at page 43). Has PSE developed a proposal for targets, sharing percentages, and the specific reward amount for the three types of chargers? If yes, please provide the proposed targets, sharing percentages, and specific reward amount for the three types of chargers. If not, when will PSE be able to share this proposal?

Response:

As Puget Sound Energy ("PSE") detailed in its Response to Public Counsel Data Requests No. 141, "Final EV charging targets will be available upon funding approval in this filing (as well as approval by the Commission of tariff schedules filed under separate dockets to support PSE's Transportation Electrification Plan ("TEP"))".

Since providing that response, PSE filed with the Commission on April 26, 2022, in Docket UE- 220294, revisions to tariff Schedules 552, 553, and 583, and added new tariff Schedules 555 and 556, that collectively offer new and revised transportation electrification services for residential and commercial/fleet customers, as well as a load management incentive and education and outreach programs. Those tariffs were allowed to become effective by operation of law at the Commission's Open Meeting held on May 26, 2022, with effective dates of June 1, 2022.

As stated in the Prefiled Direct Testimony of Mark Newton Lowery, Exh. MNL-1T, page 43:6-8, "separate targets and rewards would be established for single-family residences using Level 2 chargers, fleets using Level 2 Chargers, and fleets using Fast Chargers". Since PSE has at this time only received approval of Schedule 555 for non-residential charging products and services for public, private, and commercial fleet, PSE can only provide conditional targets for the estimated fleet chargers that are projected to be installed through that schedule. The table below provides those conditional fleet Level 2 and DC Fast Chargers charger targets for both PSE and customer owned installations that may occur through schedule 555 by calendar year.

Conditional Fleet EVSE Targets

Fleet EVSE Type	2023	2024	2025	Total
Level 2 EVSE	25	38	37	100
DC Fast Charge EVSE	50	76	74	200

PSE believes it is important to specifically state why these proposed fleet Electric Vehicle Supply Equipment (“EVSE”) targets are considered conditional. First, as detailed in PSE’s Response to Public Counsel Data Request No. 141, PSE needs to secure explicit approval and funding through this proceeding to support the targets noted above. Second, as PSE detailed in its Response to WUTC Staff Data Request No. 270, there are certain “external factors that the Company can neither predict nor control, such as supply chain limitation, inflationary or other financial issues”. These factors coupled with evolving customer expectations and the transportation electrification market, could impact PSE’s ability to achieve these targets.

As for the other metrics requested, PSE has not yet identified the sharing percentages and specific reward amounts. To do so, PSE must first identify the net benefit, per charger, of having those chargers participating in a load management program. In order to do so, PSE must first develop estimates of the load shift resulting from chargers participating in a load management product as well as the avoided costs associated with that load shift. In order to develop estimates of the load shift, PSE will rely on the results from the currently running suite of Up & Go Electric pilot products and services, which conclude in December 31, 2022. In order to identify the avoided costs associated with load shift, PSE intends to use the avoided energy, capacity, and transmission and distribution costs in the most current Integrated Resource Plan at the time of proposing the specific reward amounts.

PSE has used similar calculations in its Electric Vehicle (“EV”) load management product (detailed in its approved tariff schedule 556 referenced above). This product provides participating customers with an incentive payment for charging their vehicle outside of peak hours (defined within the tariff). The incentive payment is adjusted downward proportionally to the frequency of charging events the customer performs during peak hours. This incentive payment was designed to provide participating customers the majority of the benefit the customer is generating by managing their load. PSE may use this same incentive as the valuation for the benefits associated with the EV Performance Incentive Mechanism.