

EXH. MT-CT-5
DOCKETS NOS. UE-240004/UG-240005
2024 PSE GENERAL RATE CASE
WITNESS: MARIEL THURASINGHAM
AND CHARLEE THOMPSON

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

DOCKET NOS. UE-240004 and UG-240005
(Consolidated)

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**EXHIBIT MT-CT-5 (NONCONFIDENTIAL) TO THE
RESPONSE TESTIMONY OF**

MARIEL THURASINGHAM AND CHARLEE THOMPSON

**ON BEHALF OF
JOINT ENVIRONMENTAL ADVOCATES**

August 6, 2024

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

JEA DATA REQUEST NO. 038:

Re: Miscellaneous.

TAH-1T, page 9, lines 3-6 explains which PSE 2022 GRC energy equity commitments PSE has made progress on, including the distributional equity analysis (DEA) pilot. In UTC docket UE-220066, PSE submitted a compliance filing on March 22, 2024 that describes PSE's progress on the DEA pilot. In this filing's cover letter, the next steps listed include the following, "LBNL will develop a tool and user guide for performing DEAs on DER projects. The Company will apply the methods and standards developed in the DEA to its proposed 80 MW of distributed energy resources identified in its 2023 CEIP Biennial Update."¹ Please provide PSE's expected timeline for the process and completion of these next steps.

Response:

Puget Sound Energy ("PSE") performed the Distributional Equity Analysis ("DEA") pilot on its Community Solar product, which is expected to make up 50 MWs of the 80 MW of Distributed Energy Resource's ("DER"). The Community Solar product was selected because it had available data for analysis, was designed to provide direct benefits to customers, and would allow PSE to complete the study in the necessary timeline. Concurrently, PSE continues to develop other DER projects identified in the 2023 CEIP Biennial update to meet the year end 2025 target. Please see slide 7 from the DEA presentation submitted for the compliance filing in Docket UE-220066 for more detail.

PSE anticipates further direction from the Commission in Docket A-230217 to standardize DEA methodology for all utilities. At this time, PSE does not plan to do further DEA analysis until a methodology is established by the Commission in that docket. After the Commission establishes a DEA methodology, PSE will consider next steps for applying the methodology. Given the time uncertainty for the Commission's discussion and approval of a DEA methodology, PSE is no longer certain whether it will proceed with applying the DEA methodology to the remaining portion of the 80 MW DER projects. PSE will evaluate that question once the methodology is determined by the Commission.

¹ Lawrence Berkeley National Lab (LBNL)