

EXH. MT-CT-4  
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-4 (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. 040:**

Re: Low income.

In BDJ-3, PSE presents its 2022 energy burden analysis (EBA). What plans does the company have for the expansion of its EBA? Specifically:

- a. At what frequency does PSE update its customer income and usage data used in the EBA? Does PSE plan to increase this frequency? If so, when will this occur?
- b. Does PSE plan to assess the energy burden of customers enrolled in each of its bill assistance programs (e.g., bill discount rate, PSE HELP, arrearage management plan)? If so, when will this begin and how often will it occur?
- c. How many months of customer usage data does PSE currently require to incorporate the data into its energy burden calculation?
- d. Does PSE plan to include PSE gas customers in its calculation for customers with “deepest need”?
- e. Does PSE model or simulate energy burden over time as a function of modifications to energy assistance programs, rate increases, and/or other factors that may impact customer bills?

**Response:**

Puget Sound Energy (“PSE”) objects to JEA Data Request No. 040 to the extent this request seeks a document that does not exist and is therefore not in the possession, custody, or control of PSE. Notwithstanding these objections, and subject thereto, PSE responds as follows:

- a. PSE employs essential third-party data, which is updated annually, therefore PSE updates the Energy Burden Analysis (“EBA”) annually. PSE is not able to increase the frequency of updating the EBA due to the aforementioned reason.
- b. Yes, PSE already provided an assessment of energy burden of customers who were enrolled in each of PSE’s bill assistance programs in 2022 and 2023. This information was provided in PSE’s biennial energy assistance report submitted to the Washington Department of Commerce (“Commerce”), per the Clean Energy Transformation Act (“CETA”) Section 12 on Energy Assistance (RCW

19.405.120).

For calendar year 2022, PSE provided information for the following bill assistance programs: Home Energy Lifeline Program (“HELP”), Warm Home Fund (“WHF”), and income-eligible Community Solar Program. For calendar year 2023, in addition to the three bill assistance programs from 2022, PSE also provided information for its new Bill Discount Rate (“BDR”) program and for PSE’s temporary Arrearage Management Plan (“AMP”) both of which started on October 1, 2023.

For more information, please see tab “Assessment of Programs” in PSE’s 2024 Biennial Energy Assistance Report to Commerce (filed on April 4, 2024 in Docket UE-200629, *Staff investigation on energy assistance in Section 12 of the Clean Energy Transformation Act, which was codified as RCW 19.405.120*), available at <https://www.utc.wa.gov/casedocket/2020/200629/docsets>.

- c. PSE requires 12 months of usage data to incorporate the data into its energy burden calculation.
- d. No, PSE does not include PSE gas customers in its calculation for customers with “deepest need.” Deepest need is a named community classification for electric customers within the scope of PSE’s Clean Energy Implementation Plan as filed in Docket UE-210795 and therefore does not include the calculation of customers that only receive gas service from PSE.
- e. No, PSE does not model or simulate energy burden over time as a function of modifications to energy assistance programs, rate increases, and/or other factors that may impact customer bills.