

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET NO. UE-152253
TRANSPORTATION COMMISSION)	
)	
Complainant,)	
)	
v.)	
)	
PACIFICORP d/b/a/ PACIFIC POWER &)	
LIGHT COMPANY)	
)	
Respondent.)	
.....)	

POST-HEARING BRIEF OF
THE ENERGY PROJECT

I. INTRODUCTION

For the sake of brevity and the fact that the Commission is undoubtedly fully aware of the underlying facts of this case, the Energy Project will dispense with a full factual and procedural case summary focusing, instead, on those issues still unresolved and/or clarifying issues that were resolved during the course of the technical hearing in this matter on May 2, 2016.

In the days leading up to the technical hearing, The Energy Project (TEP) approached Pacific Power and Light (PPL) about the possibility of resolving certain issues between them. Shortly prior to the commencement of the hearing, PPL and TEP were able to finalize their agreement on several issues. Thus, the undersigned stated during the course of the hearing and on the record that certain issues between TEP and PPL had been resolved. The description and details of this partial resolution was accomplished through TEP's cross-examination of Ms. Joelle Steward, as well as PPL's responses to Bench Request Number 10, which were submitted and responded to shortly after the hearing concluded.

II. ISSUES RESOLVED AND STILL PENDING

A. ISSUES RESOLVED:

Issue 1: Submission of a proposal to the WUTC Commission for TEP's low-income bill assistance program (LIBA) and low-income weatherization (LiWx) funding as well as program modifications.

In testimony filed prior to hearing, TEP testified that, in collaboration with all stakeholders, Pacific Power should be required to submit a comprehensive plan addressing both funding and program design for the LIBA and LiWx programs by January 31, 2017. (Collins, Exh No. SMC-1T at 8:12-19).

As indicated during the cross-examination of Ms. Steward during the hearing as well as in the response of PPL to Bench Request Number 10, PPL commits to holding separate collaborative sessions with stakeholders including WUTC Staff, Public Counsel, TEP, the Northwest Energy Coalition and other interested stakeholders to identify changes, modifications, and proposals for both the LiWx and the LIBA program. The Company and stakeholders will complete a formal proposal addressing funding plans and/or modifications to both LIBA and LiWx program by the end of the first quarter of 2017, such that changes can be filed with the Commission prior to the expiration of the current LIBA program, which expires on April 30, 2017.

Issue 2: Professional facilitation for the low-income stakeholder collaborative.

In TEP's pre-hearing testimony, Mr. Shawn Collins recommended that PPL be required to hire a professional facilitator to lead a low-income collaborative. (Collins, Exhb. No. SMC-1T at 8:21-22).

After additional consideration and discussion with PPL staff, TEP agreed that to date, all parties slated to participate in the low-income stakeholder collaborative have had a positive working relationship. Considering this, TEP agrees that the cost of a professional facilitator is unnecessary at this point in time. Furthermore, PPL staff and TEP agree that if any disputes arise in the stakeholder collaborative process, parties may seek to use the Commission's existing dispute resolution process.

Issue 3: A comprehensive study of PPL's eligible low-income customer population.

TEP's pre-hearing testimony included a recommendation that PPL be required to finance and fully participate in a study of its eligible low-income customer population and to procure the

data necessary to satisfy the Commission's order in its last general rate case. (Collins, Exh. No. SMC-1T at 10:15-22).

As indicated in their response to Bench Request 10, PPL commits to working with stakeholders to collect the data necessary to gain a comprehensive understanding of the size of the low-income population in their service territory, the energy burden of low-income households, and other characteristics associated with their electricity usage. This data collection process may utilize resources within PPL and/or require engaging third party consultants.

B. ISSUES NOT RESOLVED:

Issue 1: Increase LIBA funding proportionately with any annual increases in residential bills as a result of decoupling.

As indicated in testimony, TEP recommends that PPL be required to increase funding for LIBA proportionate to any annual increases in residential bills as a result of decoupling surcharges. (Collins, Exh. No. SMC-3T at 7: 8-10). The Energy Project is not opposed to the decoupling mechanism in this case. TEP maintains, however, that there should be an increase to LIBA funding proportionate to any residential bill increases resulting from the decoupling mechanism.

III.

SUMMARY

The Energy Project believes that it is imperative to have a solid understanding of the total number of low-income households in PPL's service territory combined with more specific data pertaining to their respective energy burdens and other electricity usage characteristics so that the LIBA and LiWx programs can be tailored to better meet the needs these at risk and vulnerable households. Through stakeholder involvement and engagement from PPL staff, we fully expect

to have a well-developed proposal to submit to the Commission that incorporates a forward looking budget, as well as meaningful changes to LIBA and LiWx that will allow for more impactful benefits to be delivered to a greater number of households throughout PPL service territory. It is our goal to see this proposal approved and implemented in a timely manner that coincides with the expiration of the current funding plan in place through early 2017.

DATED, this 22nd day of June, 2016.

Brad M. Purdy