

**Exh. JES-3
Dockets UE-220066, UG-220067,
UG-210918
Witness: Jennifer E. Snyder**

**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

JENNIFER E. SNYDER

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE Response to UTC Staff Data Request No. 305 - Equity in AMI use Cases

July 28, 2022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

**DATA REQUEST DIRECTED TO: Catherine A. Koch
REQUESTED BY: Jennifer E. Snyder**

**UTC STAFF DATA REQUEST NO. 305:
Re: AMI**

Please describe how PSE considered equity in the development of its AMI Benefit Implementation Plan, Exh. CAK-7, Appendix C, including alternatives that were examined, but ultimately not adopted.

Response:

Puget Sound Energy's ("PSE") Advanced Metering Infrastructure ("AMI") Implementation Plan is based on the individual program and use case benefits and timelines developed through the "Maximizing Customer Benefits through PSE's Advanced Metering Infrastructure" report ("AMI Report") as discussed in the Second Exhibit to the Prefiled Direct Testimony of Sanem I. Sergici, Exh. SIS-3. As such, equity considerations and alternatives relevant to individual program and use case development are captured in the AMI Report, as appropriate.

Please see PSE's Responses to WUTC Staff Data Request Nos. 188, 189, 190, 193, and 284.

Specifically, the AMI Report development includes the three tiers of AMI use cases. While there may be opportunities for equity considerations in all three of the use cases, the most obvious and immediate opportunities lay with Tier 1 which includes time-varying rates ("TVR"), behavior based programs, load flexibility programs and conservation voltage reduction ("CVR") / volt-var optimization implementations due to their program development maturity.

Relative to TVR, please see the Prefiled Direct Testimony on Ahmad Faruqi, Exh AF-1T, page 2, line 17:20, which discusses the objectives of the TVR pilot and further discusses separate treatment cells including low income customers that inform TVR program development specifically with equity considered. Please also see the Prefiled Direct Testimony of Birud D. Jhaveri, Exh. BDJ-1T, page 96, line 12, which reaffirms the

pilot goal to enhance equity and further on page 100:101, which discusses considerations and protections for low income customers.

Additionally, many of the behavior based and load flexibility programs are included as part of PSE's Clean Energy Implementation Plan and specific equity benefits are identified in Appendix L¹ for programs to incorporate. With behavior based programs, deployment of more granular presentation of the information with other behavior based programs (presentation of online information, high usage notifications) will allow customers to better understand their usage patterns which will in turn encourage them to conserve. Given that energy burden is higher for low income customers, one could expect low income customers to take advantage of these programs at higher rates than non-low-income customers. With load flexibility programs such as smart-thermostat programs for space heating, grid interactive water heating control, behavioral demand responses and targeted Demand Response programs, reducing the peak demand or enabling daily load shifting in a way to better utilize system capacity, mitigation of new capacity investments and/or reductions to system energy costs should occur. These cost savings imply lower rate increases in the future, which will help improve the energy burden for low income customers.

Finally, relative to CVR, in 2022 and 2023 alone, PSE will implement CVR on 30 circuits associated with named communities.

¹ [2022_0201_Appendix L CEIP Programs and Actions Master Table 2.1.22.xlsx \(live.com\)](#)