

EXH. MT-CT-6T
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

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKET NOS. UE-240004 AND UG-
240005

(Consolidated)

CROSS-ANSWERING TESTIMONY OF

MARIEL THURASINGHAM AND CHARLEE THOMPSON

ON BEHALF OF

JOINT ENVIRONMENTAL ADVOCATES

September 18, 2024

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Exh. MT-CT-6T, Cross-Answering Testimony of Mariel Thuraisingham and Charlee Thompson

1 **I. INTRODUCTION**

2 **Q. Ms. Thuraisingham, please state your name, job title, and business address.**

3 **A.** I am Mariel Thuraisingham, and I serve as the Clean Energy Policy Lead with Front
4 and Centered, located at 2800 1st Avenue, Suite 201, Seattle, WA 98121.

5 **Q. Ms. Thompson, please state your name, job title, and business address.**

6 **A.** My name is Charlee Isabella Thompson, and I am a Policy Associate at the NW
7 Energy Coalition (“NWEC” or the “Coalition”). My business address is 811 1st Ave.,
8 Suite 305, Seattle, WA 98104.

9 **Q. Are you the same Mariel Thuraisingham and Charlee Thompson who previously**
10 **filed opening testimony on behalf of NWEC in this docket?**

11 **A.** Yes.

12 **Q. On whose behalf are you providing this cross-answering testimony?**

13 **A.** Joint Environmental Advocates.

14 **Q. What is the purpose of this cross-answering testimony?**

15 **A.** Our testimony supports the recommendations made by witness Shaylee Stokes of The
16 Energy Project (“TEP”) on several low-income issues, Byron Harmon of UTC Staff on
17 PSE’s equity work, Paul Koenig of UTC Staff on minimum designations, and Wesley
18 Franks of UTC Staff on distributional equity analysis. Affordability and equity are
19 pillars of Front and Centered and NWEC’s advocacy and are fundamental to our vision
20 of a clean, affordable, and equitable energy future. We believe that many of the
21 recommendations will facilitate this vision and provide benefits to PSE’s customers.

1 **II. RESPONSE TO TESTIMONIES**

2 **A. Response to Testimony of Witness Shaylee Stokes**

3 **Q. What is the scope of witness Stokes' testimony?**

4 **A.** Witness Stokes' lays out a number of equity-related recommendations for PSE on
5 metrics, stakeholder engagement, affordability, data collection, disconnections,
6 customer language preference, and energy program access, among other issues. We are
7 supportive of witness Stokes' testimony and highlight here our support for particular
8 recommendations.

9 **Q. Do you support the recommendation that PSE should hire an independent
10 facilitator for the Low Income Advisory Committee ("LIAC")? If so, why?**

11 **A.** Yes, we agree with witness Stokes' testimony that PSE should hire an independent
12 facilitator for the LIAC. Witness Thompson, having participated in the LIAC for
13 several years, has similarly experienced and been concerned by the Company's
14 disinterest in members' contributions. The contrast in the spirit and quality of
15 engagement between the PSE-facilitated LIAC and third party-facilitated Equity
16 Advisory Group is notable as well and in line with our experience. A good
17 independent facilitator creates a comfortable environment for advisory group members
18 and the Company, allowing concerns to be expressed without provoking defensive or
19 dismissive reactions from those who typically control the conversation. This approach
20 fosters structured and constructive engagement. The benefits of this approach would
21 expand the opportunity for true collaboration, an important interest also discussed in
22 witness Stokes' recommendation.

1 **Q. Do you support the recommendation that PSE should engage with the LIAC on**
2 **the collaborate level of the IAP2 spectrum? If so, why?**

3 **A.** Yes, we agree with witness Stokes' testimony that PSE must collaborate with the
4 LIAC. As noted in her testimony, the LIAC has goals of keeping low income
5 customers connected to power through reduced energy burden and expanded access to
6 continuously assessed and improved assistance programs. The group exists because the
7 Commission agreed that a collective, collaborative effort to reach these goals would
8 improve outcomes for PSE customers. The examples of PSE's lack of collaboration
9 raised in witness' Stokes' testimony speak to a structural problem with the current
10 group function and a clear and present opportunity to protect the integrity of the group
11 in order to respect the importance of its goals. The IAP2 "collaborate" level provides a
12 means for the Company to meet that opportunity. That collaborate level emphasizes
13 partnership in all aspects of a decision, and we, among other advocates and
14 stakeholders, are ready and willing to stand as partners with the Company to ensure
15 that the LIAC's goals are achieved through inclusive, transparent, and equitable
16 means.

17 **Q. Do you support the recommendation that the Commission should require PSE to**
18 **include 10 optional demographic questions in energy assistance applications? If**
19 **so, why?**

20 **A.** Yes, we agree with Witness Stokes' testimony that demographic data should be
21 collected in the assistance application process where applicants can elect to provide it.
22 Just as Avista collects this information from customers, PSE can and should allow
23 customers to supply it with their bill discount rate applications. As suggested in the

1 testimony, provisions to protect customer privacy and allow service agencies to access
2 and utilize the data are available. And even when customer demographic data is
3 aggregated and deidentified, it is highly useful for understanding more about
4 customers – from ability to language preference to race and ethnicity – allowing the
5 Company and partners to more effectively meet them where they are.

6 In other testimony where TEP witnesses Stokes and Colton discuss the importance of
7 sufficient equity metrics, they emphasize a point that is relevant here as well: that
8 more, better, and appropriately utilized information is critical for achieving equitable
9 outcomes. And the Company, being in a position to responsibly collect, manage and
10 apply that information, should do so.

11 **Q. Do you support the recommendation that PSE should remove criteria unrelated**
12 **to customer’s current arrearage from disconnection policies? If so, why?**

13 **A.** Yes, we agree with witness Stokes’ testimony that historical data about a customer’s
14 inability to timely pay past bills should not be considered when they are assessed for
15 dunning due to a current arrearage. PSE must revise its process to assess data pertinent
16 to the active arrearage. If the Company maintains its current practice the harms of
17 dunning and disconnection will continue to hurt marginalized and vulnerable
18 customers first and worst, intensifying the energy insecurity that communities of color
19 already disproportionately face. NW Energy Coalition has supported The Energy
20 Project’s position as laid out by witness Stokes in the 2024 Avista GRC as well.¹

¹ See Exh. CT-4T at 3-6. UTC dockets UE-240006 and UG-240007.

1 **Q. Do you support the recommendation that the Commission should order PSE to**
2 **begin meeting its customers’ language access needs by tracking language**
3 **preferences, providing information and communication in customers’ preferred**
4 **languages when available, and developing a language access plan in partnership**
5 **with its Advisory Groups? If so, why?**

6 **A.** Yes, we agree with witness Stokes’ testimony regarding language preferences and will
7 continue to support the requirement that utilities collect information about those
8 preferences and account for them in customer communications as appropriate. We
9 have heard extensively from communities that limited comprehension of utility
10 communications and resources reduces the likelihood of participation in programs for
11 which they are eligible and increases distrust and vulnerability to harm from exclusion.
12 The Company’s commendable efforts to increase language access still fall short, and
13 we agree with witness Stokes that more action is needed, in collaboration with
14 advisory groups and community-based partners, to understand and improve how
15 language preferences are tracked and can be better met. The NW Energy Coalition has
16 also supported TEP’s position on language justice in the 2024 Avista GRC.²

17 **B. Response to Testimony of Witness Byron Harmon**

18 **Q. How has witness Harmon outlined recommendations in his testimony?**

19 **A.** Witness Harmon addresses recommendations for PSE’s energy equity strategies and
20 development through the four energy equity tenets (recognition justice, procedural

² See Exh. CT-4T at 10-11. UTC dockets UE-240006 and UG-240007.

1 justice, distributive justice, and restorative justice) and through Native Nations and
2 Energy Justice, and Equity Investment Zones (“EIZ”).

3 **Q. Do you support witness Harmon’s recommendations?**

4 **A.** Yes. We are broadly supportive of witness Harmon’s recommendations for energy
5 equity strategies and development and we would like to further expand on some of the
6 recommendations related to recognition justice, procedural justice, restorative justice,
7 and tribal energy justice.

8 **Q. What are witness Harmon’s recommendations regarding recognition justice that**
9 **you want to expand on?**

10 **A.** Harmon recommends that the Commission should order PSE:

11 1) “to commit to ongoing research and understanding the historical, cultural,
12 and institutional dynamics that have shaped the current reality in which PSE
13 operates its business. Further, that PSE share that research and understanding
14 on its website on a clearly titled page to be found under the ‘Who We Are’ and
15 ‘In Your Community’ headings to be published no later than nine months from
16 the date of the order.”³

17 2) “to demonstrate how its historical research and understanding informs its
18 other ongoing equity justice work in future rate cases by providing testimony
19 that explains the historic and ongoing dynamics that have led to inequities and

³ Exh. BLH-1T at 15:13-18.

1 how each proposed modification to their rates, practices, or operations works to
2 interrupt, undo those dynamics.”⁴

3 **Q. Do you support these recommendations? If so, why?**

4 **A.** Yes. These recommendations address the core of *all* equity work, including that of
5 energy equity. To our knowledge, no other utility has committed to such actions. We
6 believe that PSE’s commitment to this research and public access would significantly
7 enhance their equity planning and implementation. Furthermore, requiring PSE to
8 provide testimony explaining future proposed modifications to rates, practices, and
9 operations directly aligns with the Commission’s guidance in the Cascade Natural
10 Gas’s 2021 General Rate Case Final Order 09 which tasks utilities and the
11 Commission with applying equity to every consideration and to provide supporting
12 evidence as to why a certain decision was made.⁵

13 **Q. What are witness Harmon’s recommendations regarding procedural justice that
14 you want to expand on?**

15 **A.** Harmon recommends that the Commission should order PSE to:

- 16 1) “Post guidelines, instructions, and templates on the company’s CEIP, IRP,
17 and ISP webpages for interested parties to effectively participate in
18 company proceedings.”⁶

⁴ Exh. BLH-1T at 16:4-8.

⁵ Cascade 2021 GRC Order 09, page 19, paragraph 20. UTC docket UG-210755.

⁶ Exh. BLH-1T at 17:3-5.

1 2) “engage with the Equity Advisory and Low-income Advisory groups, as
2 well as Commission Staff, at the Consult, Involve, Collaborate, or Empower
3 public participation levels, as appropriate.”⁷

4 **Q. Do you support these recommendations? If so, why?**

5 **A.** Yes. Posting resources directly on utility webpages would be a significant step toward
6 improving procedural justice by increasing public access and engagement
7 opportunities, including making it easier for PSE customers to find this information.
8 PSE and Commission should also consider developing and incorporating an online
9 public participation form similar to what the Oregon PUC has implemented.⁸ This
10 would cover more broadly the efforts to make public participation in utility
11 proceedings accessible.

12 Additionally, Harmon’s recommendation that PSE engage with EAG, LIAC,
13 and Staff at the Consult, Involve, Collaborate, and Empower levels of the IAP2
14 spectrum is well-founded from our experience as EAG and LIAC members.⁹
15 Particularly with the LIAC in the past two years, we have witnessed poor collaboration
16 in which decisions that the LIAC thought it had helped craft and agreed to with PSE
17 were overturned by the Company at later dates, confusing and surprising LIAC
18 members. Witness Stokes discusses these examples in detail in her testimony.¹⁰ An

⁷ Exh. BLH-1T at 18:9-12.

⁸ <https://apps.puc.state.or.us/DocketPublicComment>.

⁹ Witness Thuraingham was a member of the inaugural EAG, from March 2021- March 2022. Witness Thompson joined in the LIAC in July 2022 and is a current member.

¹⁰ Exh. SNS-1T at 8-12.

1 expectation should be set and guidance, such as that from the IAP2, should be given
2 that will help PSE better engage with its advisory groups.

3 **Q. What is witness Harmon’s recommendation regarding restorative justice that you
4 want to expand on??**

5 **A.** “Staff recommends that the Commission order PSE to examine its hiring and
6 employment practices to identify any inequities within nine months of the
7 Commission’s order in this case. If inequities are identified, then PSE should develop
8 and implement a plan to remedy those inequities.”¹¹

9 **Q. Do you support this recommendation? If so, why?**

10 **A.** Yes. The change that PSE is working towards begins from within the utility. Like
11 witness Harmon, we recognize the strategies PSE has developed to advance energy
12 equity internally and externally. We appreciate this recommendation to take PSE’s
13 internal work further by not only identifying inequities that may exist in hiring and
14 employment, but by also requiring that PSE promptly develop a plan to address these
15 inequities. Staff’s recommendation is reflective of the Commission’s own internal
16 commitment as described in the UTC Pro-Equity Anti-Racism Strategic Action Plan.¹²

17 **Q. What is witness Harmon’s recommendation regarding tribal energy justice that
18 you want to expand on?**

¹¹ Exh. BLH-1T at 29:1-4.

¹² <https://www.utc.wa.gov/sites/default/files/2023-09/2023%20PEAR%20Strategic%20Action%20Plan%20-%20UTC.pdf>.

1 A. “Staff suggests that PSE, through EAG input and consultation with Native nations,
2 provide evidence that PSE has incorporated Native nations’ priorities in future filings,
3 and that PSE is engaging with Native nations in a manner that honors their dignity as
4 sovereign nations. Staff emphasizes that the list below is for PSE’s consideration to
5 further engage with the Native nations. Ultimately, specific issues addressed should be
6 driven by the interests of Native nations.”¹³ Witness Harmon then states that PSE
7 should “develop metrics and take specific actions within the scope of PSE’s future
8 filings”¹⁴ that consider ten priorities pertaining to recognition and consideration of
9 tribal sovereignty, treaty rights, cultural practices, culturally significant sites and
10 species, access to first foods, and habitat restoration.

11 **Q. Do you support this recommendation? If so, why?**

12 A. Yes. We appreciate witness Harmon’s intentional look into PSE’s work with tribes and
13 where gaps exist. We support setting the expectation that tribal priorities must be
14 considered and addressed in future filings, and that evidence must be provided to
15 support it. We also would like to see all ten priorities that witness Harmon lists
16 considered in full. The recommendation for “consultation with Native nations” may
17 need more discussion to identify what this process should look like if the consultation
18 is to be meaningful and truly reflective of tribal priorities.

19 **C. Response to Testimony of Witness Paul Koenig**

20 **Q. What is witness Koenig’s recommendation regarding minimum designations?**

¹³ Exh. BLH-1T at 36:13-18.

¹⁴ Exh. BLH-1T at 36:19-20.

1 A. “Staff proposes that PSE develop and submit an action plan to provide over 30 percent
2 of DR energy benefit to Named Community customers. This action plan will be
3 submitted as a compliance item to the Commission and should include how PSE plans
4 to quantitatively measure this 30 percent of energy benefit requirement and how PSE
5 will enforce this energy benefit goal on its selected third party implementors.”¹⁵

6 **Q. Do you support this recommendation? If so, why?**

7 A. Yes. We agree with witness Koenig’s concern and support his recommendation for an
8 action plan. If programs are available to everyone, it is challenging to identify steps
9 that ensure that benefits are going to named communities. Furthermore, many
10 programs that may be intended to benefit named communities enroll customers with a
11 first-come, first-serve approach which is an inequitable way to serve customers in
12 named communities. To help address this, we recommend that PSE be required to
13 describe in this action plan how it is prioritizing and targeting different communities
14 for its customer-serving clean energy programs.

15 The action plan should lay out how the appropriate teams at PSE are
16 collaborating to apply specific target-setting, outreach, engagement, relationship,
17 partnership, enrollment, program participant support, and learning strategies to
18 reaching a diversity of named community members and community organizations; and
19 how those strategies are complementary and customized to the respective communities
20 and particularly those identified as deepest need.

¹⁵ Exh. PK-1T at 12:15 – 13:1.

1 **D. Response to Testimony of Witness Wesley Franks**

2 **Q. How has witness Franks outlined recommendations in his testimony?**

3 **A.** Witness Franks breaks up his testimony recommendations into the following
4 categories: Equity and decarbonization planning, policies applicable to equity in
5 decarbonization, PSE’s decarbonization activities, PSE’s decarbonization rate
6 adjustment, and PSE’s clean energy implementation plan deferral.

7 **Q. Do you support witness Franks’ recommendations?**

8 **A.** We support witness Franks’ two recommendations related to distributional equity
9 analysis (“DEA”) and would like to expand on them. We also pose questions on
10 witness Franks’ recommendation regarding a true-up.

11 **Q. What are witness Franks’ recommendations regarding DEA?**

12 **A.** Witness Franks recommends that the Commission should order PSE to:

- 13 1) “Conduct a DEA of the entirety of PSE’s distributed solar portfolio,
14 fulfilling the original Stipulation L in PSE’s 2022 GRC settlement (Docket UE-
15 220066). In conducting the DEA, the Company will consult best practices
16 including, but not outlined in the U.S. Department of Energy’s *Distributional*
17 *Equity Analysis for Energy Efficiency and Other Distributed Energy Resources:*
18 *A Practical Guide* (DEA Practical Guide). The Company will also work closely
19 with Staff, interested parties, and its advisory groups early and often to ensure
20 that reasonable progress is made for completion of the DEA. PSE will file the
21 findings, results, and any learnings from the DEA within this docket no later

1 than January 31, 2027, and incorporate them into the Company's first
2 Integrated Resource Plan (ISP)."¹⁶

3 2) "Conduct a DEA on PSE's proposed targeted electrification pilot (TEP) Phase
4 2. In conducting the DEA, the Company will consult the best practice guidelines
5 including, but not limited to, those outlined in the DEA Practical Guide. The
6 Company will also work closely with Staff, interested parties, and its advisory
7 groups early and often to ensure that reasonable progress is being made for
8 completion of the DEA. PSE will file the findings, results, and any learnings from
9 the DEA within this docket no later than January 31, 2027, and incorporate them
10 into the Company's first ISP."¹⁷

11 **Q. Do you support these recommendations? If so, why?**

12 **A.** Yes. We agree with the timely manner in which these DEAs should be conducted and,
13 as we stated in our initial response testimony, we do not agree with PSE that the
14 Company should wait until March 2026 before it continues to develop its DEA
15 methodology. These DEAs proposed by Staff are a next step in PSE's energy equity
16 work and work in tandem with several of witness Harmon's other recommendations.
17 Namely, DEAs can build upon the collection of historical, cultural, and institutional
18 dynamics that witness Harmon recommended, and DEAs can be a tool to evaluate
19 PSE's potential future work on equity investment zones.

¹⁶ Exh. WF-1T at 2:21 – 3:8.

¹⁷ Exh. WF-1T at 3:9-16.

1 **Q. What are witness Franks' recommendations regarding PSE CEIP deferral?**

2 **A.** Witness Franks says that, in order to minimize intergenerational inequity, the
3 Commission should order PSE to “file a tariff revision no later than March 31, 2025,
4 wherein the Company will true-up the estimated 2024 costs to known actuals.”¹⁸

5 **Q. Do you support this recommendation? If so, why?**

6 We support actions that protect the public interest and minimize intergenerational
7 inequity, and while settling the deferral balance in a timelier manner is prima facie
8 beneficial to customers when refunds are issued, we have concerns as to how equity is
9 advanced with respect to the potential for midyear rate increases. If a true-up cost
10 results in higher rates, for instance, during peak energy usage seasons, like summer or
11 winter, will the Commission still proceed with raising rates at that time? Additionally,
12 what measures will Staff or the Commission implement to protect customers from
13 potential negative effects of raising rates, such as the risk of disconnection? The
14 Commission must ensure that any opportunity to bypass GRC processes does not come
15 at the cost of procedural safeguards (i.e., opportunity for rigorous public and
16 intervenor scrutiny) for affordability today as well as tomorrow. We encourage the
17 Commission to design any true up requirement to equitably distribute benefits and
18 reduce burdens.

¹⁸ Exh. WF-1T at 34:19-21.

1 **III. CONCLUSION**

2 **Q. What are your recommendations?**

3 **A.** We recommend that the Commission:

- 4 1) Adopt witness Stokes' recommendations for an independently facilitated,
5 collaborative LIAC, voluntary customer reporting on demographic data, removing
6 historical considerations in electing which customers are in the dunning process,
7 and action to understand and meet customer language preferences.
- 8 2) Adopt witness Harmon's recommendations in full.
- 9 3) Consider developing and incorporating an online public participation form similar
10 to what the Oregon PUC has implemented to expand access and public
11 participation opportunities in PSE and other regulated utility proceedings.
- 12 4) Adopt witness Koenig's recommendation that PSE be instructed to develop and
13 submit an action plan to provide over 30 percent of DR energy benefit to Named
14 Community customers. We recommend that PSE be required to describe in this
15 action plan how it is prioritizing and targeting different communities for its
16 customer-serving clean energy programs. More specifically, PSE should be
17 required to outline how it will apply target-setting, outreach, engagement,
18 partnerships, enrollment, participant support, and learning strategies to reach a
19 diverse range of community members and organizations. PSE should explain how
20 these strategies are tailored to specific communities, particularly those identified as
21 "deepest need."

1 5) Adopt witness Franks' recommendation that the Commission order PSE to conduct
2 a DEA of the entirety of PSE's distributed solar portfolio and a DEA of PSE's
3 proposed targeted electrification pilot (TEP) Phase 2.

4 **Q. Does this conclude your testimony?**

5 **A. Yes.**