

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-220066 and UG-220067
(Consolidated)

EXHIBIT SNS-9

PSE Response to WUTC DR 313

December 8, 2023

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

WUTC STAFF DATA REQUEST NO. 313:

REQUESTED BY: Jacque Hawkins-Jones

RE: PSE Petition to Amend Final Order

Has PSE performed an equity analysis to evaluate the impacts of the requested amendment to Order 24? If so, please provide a copy of the analysis. If not, please explain why PSE has not done so.

Response:

No, Puget Sound Energy (“PSE”) has not performed an equity analysis to evaluate the impacts of the requested amendment to Order 24 because the requested amendment to Order 24 does not have any immediate equity impacts. Rather, any impacts will be determined by the actions PSE takes following a final order by the Commission, which in turn rely on a settlement agreement, if any, the parties may propose to the Commission.

PSE uses a four-part framework for assessing the equity impacts and energy justice of a given action. This approach includes recognition, procedural, distributional, and restorative justice components. PSE has compiled data related to recognition and distributional justice by examining the count and proportion of customers with past-due accounts with various vulnerability characteristics. Table 1 below illustrates this data. PSE considered three thresholds of past-due amount and determined how many customers with past-due amounts above those thresholds have a given vulnerability characteristic. PSE plans to expand its equity analysis by augmenting these data with procedural and restorative justice analyses.

Table 1: Equity Characteristics of Customers with Past-due Balances*

Past-Due Threshold	> \$1	> \$70	> \$125	Percentage in Total Customer Base with Vulnerability Characteristic
Total Number of Customers with Past-Due Accounts	268,480	194,388	155,511	
Highly Impacted Community (“HIC”)	90,429 (33.7%)	68,325 (35.1%)	55,660 (35.8%)	30%
High Vulnerability Population	127,107 (47.3%)	95,564 (49.2%)	77,639 (49.9%)	33%
Known Low-Income	11,831 (4.4%)	10,473 (5.4%)	9,346 (6.0%)	3.5%
Estimated Low-Income	123,692 (46.1%)	95,028 (48.9%)	78,170 (50.3%)	46%
Energy-Burdened**	48,065 (17.9%)	39,282 (20.2%)	33,812 (21.7%)	16%
<p>* Please note that the data overlaps between and among the various vulnerability characteristics. The percentages shown (for vulnerability characteristics) indicate a percentage of the Total Number of Customers with Past-Due Accounts, for each Past-Due Threshold. **Note Energy-Burdened here includes non-low-income customers.</p>				