

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.

First Supplemental Response:

Puget Sound Energy, (“PSE”) hereby supplements its response to WUTC Staff Data Request No. 313 to clarify that it viewed the data analysis included in Table 1, below, as an equity analysis. PSE analyzed equity features across different subsets of customers who may be affected by its proposed Phased solution, which constitutes an analysis of equity. Since PSE did not find disproportionate impacts in vulnerable customer groups, it did not conduct a more extensive equity analysis to determine root causes and potential corrective actions to account for disproportionate impacts. Therefore, PSE did conduct an equity analysis regarding its proposed Phased approach. Upon finding no evidence of disproportionate impacts to vulnerable populations, PSE did not conduct a more in-depth equity analysis to address disproportionate impacts.

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%
* 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.				