

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-170033 and UG-170034
Puget Sound Energy
2017 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 445

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RE: Puget Sound Energy's Low-Income Rate Assistance Programs, Direct Testimony of Suzanne M. Sasville, Exhibit No. SMS-1T.

1. Please refer to Exhibit No. SMS-1T at 3:8-10, which states, "Exhibit No. ____ (SMS-3) is an internal analysis that estimates approximately 20% of households (with three or more persons) in the counties served by PSE are living at or below 150% of the federal poverty level."
 - a. Please explain why this analysis only includes households of "three or more people."
 - b. Please specify which counties PSE included in the analysis to arrive at this estimation.
 - c. Please confirm if PSE's service territory boundaries align with the counties' boundaries.
2. Please refer to Exhibit No. SMS-3 and respond to the following:
 - a. Please provide any documentation or analysis that the Company used to determine whether the percentage of people living at 200%, 150%, and 125% of the 2014 Federal Poverty Line equals PSE's customer population that meets the same income criteria.
 - b. Please explain how the Company reached the decision to apply ACS data for three-plus person households in the relevant counties to the number of PSE customers, given that the "Total ACS HHs" is not equal to the number of "PSE Customers (2015 PSE 10k)."

Response:

1.
 - a. Puget Sound Energy's ("PSE") study relies on publicly-available information on poverty levels from the U.S. Census American Community Survey ("ACS"). PSE chose a household size of "three or more people" to be consistent with the ACS national average family size of 3.23 in the study year (2014).
 - b. PSE included Island, King, Kitsap, Kittitas, Lewis, Pierce, Skagit, Snohomish, Thurston, and Whatcom counties.
 - c. Attached as Attachment A to PSE's Response to Public Counsel Data Request No. 445 is a map that shows PSE's service territory boundaries for both electric and natural gas service.
2.
 - a. No such analysis exists. PSE relies on publicly-available poverty data from the ACS to estimate the number of households living at the various percentages of poverty level in the counties that PSE serves.
 - b. PSE chose to rely on publicly-available data to conduct its analysis and generate a reasonable estimate of households at various levels of poverty. PSE customer counts are published annually in PSE's 10-K report. The ACS data is the most comprehensive publicly-available data set on poverty of which PSE is aware. PSE chose a household size of "three or more people" to be consistent with the ACS national average family size of 3.23 in the study year (2014).