

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,
v.

PUGET SOUND ENERGY,

Respondent.

Docket UG-230968

COMPLIANCE FILING OF PUGET
SOUND ENERGY

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INTRODUCTION

- 1 Puget Sound Energy (PSE) respectfully submits this compliance filing to the Washington Utilities and Transportation (UTC) Commission pursuant to Order 01 (December 22, 2023)¹ in this proceeding which required reporting regarding decarbonization programs.² In Order 01 (Dec. 22, 2023), the Commission approved³ PSE’s revised proposal to spend \$7.7 million in 2024 auction proceeds from the consignment of no-cost allowances for targeted decarbonization projects for low-income customers, multi-family customers with low-income customers or in named communities, and small business customers in named communities, consistent with statutory provisions.⁴ In its filing, PSE proposed to consult with its Low Income Advisory Committee (LIAC), along with other interested parties and advisory groups, during the first quarter of 2024, to inform program design.
- 2 This compliance filing confirms that PSE engaged with its LIAC and other interested parties and advisory groups in the first quarter of 2024 and provides a summary of the program design. This engagement with interested parties indicated that all parties supported or were neutral regarding the final CCA decarbonization projects program design presented herein.
- 3 The decarbonization projects described herein are offerings of PSE, but cannot be operationalized without customer action to install appliances.

¹ *Washington Utilities and Transportation Commission (WUTC), UG-230968, Order 01 (Dec. 22, 3023), Complaint and Order Suspending Tariff Revisions; Allowing Rates Subject to Later Review and Refund.*

² *See id.*, at ¶ 25.

³ UG-230968 *WUTC* Order 01 (Dec. 22, 3023), at ¶ 16.

⁴ *See id.*, at ¶ 8. “Staff observed that the Company’s investments in decarbonization measures were consistent with statutory requirements.”

4 All correspondence related to this Compliance Filing should be directed as follows:

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BACKGROUND

5 In 2021, the Washington State Legislature passed Senate Bill 5126, also known as the Climate Commitment Act (CCA) or “Cap-and-Invest Program,” codified as RCW 70A.65, to reduce greenhouse gas (GHG) emissions. The Cap and Invest Program went into effect on January 1, 2023.⁵ The CCA provides no-cost allowances to natural gas utilities “[f]or the benefit of ratepayers.”⁶ The CCA has specific requirements related to the allowed use of no-cost allowances allocated to natural gas utilities: it requires natural gas utilities to consign no-cost allowances to auction for the benefit for their customers, deposit the allowances for compliance, or a combination of the two.⁷ Furthermore, the CCA has specific requirements related to the allowed use of the revenues received from the consignment of no-cost allowances. The CCA requires natural gas utilities to return revenues from no-cost allowances sold at auction to customers by

- (i) ...at a minimum eliminating any additional cost burden to low-income customers from the implementation of this chapter;⁸ and
- (ii) providing nonvolumetric credits on ratepayer utility bills, prioritizing low-income customers, or used to minimize cost impacts on low-income, residential, and small business customers through actions that include, but are not limited to, weatherization, decarbonization, conservation and efficiency services, and bill assistance.⁹

⁵ RCW 70A.65.070.

⁶ RCW 70A.65.130(1).

⁷ See WAC 173-446-240(3).

⁸ RCW 70A.65.130(2)(a); see also WAC 173-446-300(2)(b)(iii).

⁹ RCW 70A.65.130(2)(b); see also WAC 173-446-300(2)(b)(iii)(A).

- 6 Furthermore, CCA requires that customer benefits provided from natural gas no-cost allowances consigned to auction must be in addition to existing requirements in statute, rule, or other legal requirements.¹⁰
- 7 On November 22, 2023, PSE filed with the Commission revisions to natural gas tariff WN U-2, Schedule 111, Greenhouse Gas Emissions Cap and Invest Adjustment (“PSE’s 2024 CCA Gas Tariff Filing”). This filing included a proposal to allocate \$23 million in estimated no-cost allowance revenue benefits from 2024 to fund targeted decarbonization projects to be implemented during the years 2024 through 2026.¹¹ This initial proposal was informed through PSE’s engagement with interested parties in 2023 about CCA implementation topics,¹² which indicated that many parties are supportive of PSE investing consigned no-cost allowance revenue in decarbonization projects that target low-income customers and named communities. On December 19, 2023, aligned with discussions held with Commission Staff, PSE filed a substitute filing and amended its proposal to spread the withholding of the proceeds for targeted electrification projects over the three years of 2024 to 2026, setting aside \$7.7 million in estimated proceeds for no-cost allowances during the 2024 rate period.¹³
- 8 In the filing, PSE proposed:

Decarbonization projects will be designed for Identified Low Income Customers, or multi-family premises with Identified Low Income Customers or multi-family premises in a Named Community, where Named Community means either a Highly

¹⁰ RCW 70A.65.130(2)(b); *see also* WAC 173-446-300(2)(b)(iii)(B).

¹¹ UG-230968 (Advice No. 2023-56), PSE’s Cover Letter (November 22, 2023), at p. 2, PSE’s Natural Gas Tariff Filing proposed revisions to rates under natural gas tariff Schedule WN U-2, Schedule 111, Greenhouse Gas Emissions Cap, and Invest Adjustment.

¹² In order to be proactive on complex CCA implementation issues, PSE organized a series of meetings and workshops with interested parties in 2023 to discuss various gas utility CCA implementation issues germane to preparation of a tariff filing related to CCA compliance costs and no-cost allowance revenues.

¹³ UG-230968 (Advice No. 2023-56) PSE’s Substitute Natural Gas Tariff Filing. December 19, 2023.

Impacted Community or Vulnerable Populations as defined in RCW 19.405.020. Decarbonization projects will also be designed for Small Business Customers in a Named Community, where Named Community means either a Highly Impacted Community or Vulnerable Populations as defined in RCW 19.405.020. Small Business means any business entity, that is owned and operated independently from all other businesses, and that has 50 or fewer employees at that premise. The qualifying Small Business must be a licensed for-profit business having 3-year average gross annual receipts not exceeding \$30.4 million¹⁴. It is the responsibility of the Customer to provide all evidence to the Company that they meet the qualifications before receiving any benefit or incentive.¹⁵

PSE will continue to consult with PSE's Low Income Advisory Committee, along with other interested parties and advisory groups, during the first quarter of 2024, to inform project design.¹⁶

- 9 In its Staff Memo, the UTC Staff observed that PSE's proposed targeted investments in decarbonization measures were consistent with statutory requirements:

PSE proposal is consistent with RCW 70A.65.130 which allows revenues from allowances sold at auction to be used to minimize cost impacts on low-income, residential, and small business customers through actions that include decarbonization.¹⁷

- 10 The matter came before the Commission at its December 21, 2023, open meeting.¹⁸

- 11 In its Order 01 (December 22, 2023) of this proceeding, the Commission agreed with Staff's recommendation to suspend this matter for adjudication (related only to CCA risk sharing mechanism¹⁹) while allowing rates on an interim basis, subject to later review and refund, and allowing the \$7.7 million targeted decarbonization investments:

The Commission therefore suspends the tariff sheets filed by PSE on November 22, 2023, as revised on December 19, 2023, but allows the proposed rates to become effective on January 1, on an interim basis, subject to refund, pending the

¹⁴ This definition is consistent with the criteria outlined by the Washington State Legislature and Washington State Office of Minority & Women's Business Enterprises, and the Officer of the United States Trade Representative; as well as RCW 19.85.020.

¹⁵ UG-230968 (Advice No. 2023-56), PSE Cover Letter (Nov. 22, 2023), at p. 2.

¹⁶ *See id.*, at p. 3.

¹⁷ UG-230968 *UTC Staff Memo* (December 21, 2023), at p. 3.

¹⁸ *WUTC Open Meeting Minutes for 12-21-23*.

¹⁹ *See id.*, ¶ 14.

Commission's final determination in this Docket. The Commission further requires that PSE submit annual reports to the Commission describing its investments in decarbonization projects... The Commission approves of the Company's proposal to recover the costs of its decarbonization projects over a three-year period, as set forth in its revised tariff sheets filed December 19, 2023.²⁰

12 The December 21, 2023, Open Meeting minutes captured the relevant condition of the tariff approval as,

The company file annual status reports on the decarbonization projects proposed in this filing and that the company file updated plans with the commission based on the agreements with the stakeholder discussions.²¹

²⁰ See *id.*, ¶ 16.

²¹ *WUTC Open Meeting Minutes for 12-21-23*, ¶ 9.

PSE ENGAGEMENT ON TOPIC

13 Pursuant to PSE’s initial proposal and Order 01 in Docket UG-230968, PSE organized a series of meetings with interested parties in the first quarter of 2024 to discuss program design for CCA decarbonization / electrification projects.

14 In the first quarter of 2024, PSE held the following CCA Decarbonization Projects workshops with interested parties²²:

- **January 23, 2024:** PSE presented background on the Climate Commitment Act and relevant requirements in the law and from Order 01 in this Docket UG-230968, and discussed with parties the initial proposed budget, goals, considerations, and program segments. The three program segments discussed were: low income single-family residential, multi-family residential – with low-income customers and in named communities, and small business in named communities. Each program segment discussion included relevant program designs, such as in PSE’s ongoing Targeted Electrification Pilot, and discussion topics and areas for feedback. PSE collected feedback during the meeting and also received written feedback from some parties after the meeting.

²² The interested parties that were invited and/or participated in PSE’s CCA decarbonization projects workshop meetings were: 1. Climate Solutions (CS); 2. Equity Advisory Group (EAG); 3. NW Energy Coalition (NWECC)*; 4. Public Counsel (PC)*; 5. The Energy Project (TEP)*; 6. Washington Conservation Action (WCA)*; 7. Washington Utilities and Transportation Commission (WUTC) Staff*; 8. Washington State Department of Commerce*; 9. Tacoma Power; 10. Seattle City Light (SCL); 11. Seattle HomeWise*; 12. King County Housing Authority (KCHA)*; 13. Community Action Council of Lewis/Mason/Thurston Counties (CAC LMT)*. The interested parties marked with an asterisk are also members of PSE’s Low Income Advisory Committee (LIAC). The last three parties in the list are community action partnership (CAP) / community action agencies (CAA) or municipality agency that already work with PSE on low-income weatherization projects as part of PSE’s weatherization assistance program and as part of PSE’s Targeted Electrification Pilot low-income offerings.

- **February 27, 2024:** PSE presented a summary of feedback received from parties since the first meeting, updated program goals integrating this feedback, and proposed a phased approach to CCA decarb program development. PSE's proposed phased approach to CCA decarb program development to maximize impact of the 2024 CCA no-cost allowance auction proceeds-based funding means focusing 2024 on deploying funds in partnership with peer utilities and community organizations, while planning longer-term grant-based program deployment in 2025-2026. In this second meeting, PSE and parties also discussed the three program segments with proposed design elements within the proposed phased approach framework. PSE collected feedback during the meeting, and PSE also organized a survey to solicit written feedback from parties.
- **March 18, 2024:** PSE presented a summary of the survey feedback from parties and presented the final program design outlined for the 2024 and 2025-2026 phases of the phased approach to CCA decarb program development, with estimated budgets by program segment element. PSE discussed with parties either updated program design elements, or more details of proposed elements, reflecting some of the feedback received from parties and indicating areas for future work. The survey results showed that all parties supported or were neutral regarding PSE's proposed phased program design elements for all three program segments. The survey results provided valuable feedback, questions, and considerations.

15 In addition to the three large meetings with parties, in the first quarter of 2024, PSE also held a number of one-on-one engagement meetings with various parties, potential partners (peer

utility and community organizations), and with municipality / community action partnership (CAP) / community action agencies (CAA).

16 During the program implementation stage for 2024, PSE will continue to work closely with identified partners to work out contract details and other next steps. PSE plans to file its first annual CCA decarb investments progress report, as required per Order 01, with the next CCA tariff filing expected in mid-November 2024.

2024 PSE'S CCA DECARB PROGRAM DESIGN

Overarching Goals

17 Working with interested parties, PSE outlined the following overall program goals for PSE's

CCA Decarb Program:

- Facilitate decarbonization projects for low-income residential customers and small business customers in Named Communities;
- Decrease customer emissions from natural gas space heating, water heating, and cooking as applicable;
- Assist low-income and vulnerable customers with upfront costs of electrifying, thereby enabling electrification transition for customers who would otherwise not likely be able to afford it;
- Leverage lessons learned, successful processes, and other feedback from the Targeted Electrification Pilot;
- Allow for budget flexibility between sub-programs based on program needs, partnerships, and timelines;
- Incorporate customer education in multiple languages:
 - Project expectations, timelines, and other details,
 - Pertinent customer assistance programs;
- Align CCA funding with other funding sources (e.g., the Inflation Reduction Act, Commerce, federal and state grants), or conservation funding, as much as possible;
- Benefits to apply to all PSE gas service customers.

18 As was also mentioned in the section above, PSE's CCA Decarb Program is proposed to be phased: first, with 2024 program segments that aim to maximize impact through a series of

discrete projects by leveraging partnerships and providing funding for CAP/CAA agencies to support capacity building, followed by a longer-term grant-based framework for 2025-2026. The program budgets and number of customers that will be served described herein are estimates; these projects are dependent upon customers taking action to upgrade residential and business premises and cannot be fully operationalized by PSE.

Single-Family Residential

19 In the single-family residential program segment, PSE worked with interested parties and interested partners to identify focused projects and partnerships for 2024:

- (1) High Point Direct Installs (Seattle HomeWise) project partnership,
- (2) Tacoma Power’s Income-Qualified Rental Program (IQRP) partnership,
- (3) Energy Smart Eastside (ESE) partnership, and
- (4) Decarbonization and weatherization program capacity building support for CAP/CAA Agencies.

(1) High Point Direct Installs Partnership with Seattle HomeWise

20 For (1), the High Point Direct Installs project, PSE plans to partner with the Seattle-area focused entity – Seattle HomeWise, and through them with Seattle Housing Authority (SHA). HomeWise is a program of the Seattle Office of Housing that provides weatherization and home repair services for income-qualified households and apartment buildings with low-income tenants.²³ High Point is one of the SHA’s public housing

²³ *Seattle Office of Housing* Weatherization Program webpage, last accessed on May 1, 2024. <<https://www.seattle.gov/housing/homeowners/weatherization/contractors>>

properties located in West Seattle. High Point is a campus of 600 dwelling units with single-family rental homes of various shapes and sizes.²⁴ PSE has verified that High Point is in PSE's Highly Vulnerable Population (High VP) and Highly Impacted Community (HIC).²⁵ Through this High Point partnership, PSE's CCA Decarb Program would provide \$2.76 million for electrification of natural gas space and/or water heating systems for an estimated 53 verified low-income units in the High Point public housing community.

(2) Income-Qualified Rental Program Joint Utility Partnership with Tacoma Power

21 For (2), the Tacoma Power's Income-Qualified Rental Program (IQRP) program partnership, PSE's CCA Decarb Program would provide \$800,000 to this program in 2024 in which Tacoma Power will expand their IQRP program in 2024 to assist an estimated additional 25 low-income homes²⁶ of renters in PSE's gas only service territory and in the electric territory of Tacoma Power. PSE's CCA Decarb Program funding would fund 100% cost of space and/or water heating heat pumps, while Tacoma Power would provide funding for 100% of conservation/weatherization upgrade costs. Tacoma Power's Income-Qualified Rental Program is a new program designed specifically to serve low-income single-family customers. Tacoma Power IQRP began in 2022, and since inception has completed over 20 projects in 2023. The Tacoma Power IQRP is scaling up to provide more improvements and

²⁴ *Seattle Housing Authority*, Properties, High Point webpage, last accessed on May 1, 2024.

<<https://www.seattlehousing.org/properties/high-point>>

²⁵ *Puget Sound Energy*. PSE Named Communities map, last accessed on May 1, 2024.

<<https://pugetsoundenergy.maps.arcgis.com/apps/mapviewer/index.html?webmap=55b43c36edd44731992f4e207dc19f70>>

²⁶ The number of low-income households that would receive electrification benefits is an estimate because each individual project would vary in cost, depending on the needs of each household project. Furthermore, the ultimate number of customers served would also depend on customers' uptake. Although PSE and our partners will offer all these benefits of fully mitigating the cost of heat pumps, customers are ultimately the ones who must take advantage of and follow through these decarbonization / targeted electrification offerings by PSE or our partners.

services to renters in 2024 and beyond. Tacoma Power IQRP provides full cost coverage²⁷ if property owners limit potential rent increases.²⁸ By partnering with Tacoma Power in their IQRP program, PSE will be able to leverage a standing and successful targeted program to provide comprehensive benefits to PSE’s vulnerable, low-income rental customers starting in 2024. Tacoma Power employs multiple methods of income-qualification verification and all projects in this partnership will be low-income verified renters. PSE has shared its Named Community maps²⁹, and will be able to verify with Tacoma Power which of the program partnership recipients are in PSE’s Named Communities.

(3) Energy Smart Eastside Direct Installs Partnership

22 For (3), the Energy Smart Eastside (ESE) partnership, PSE’s CCA Decarb Program would provide \$850,000 in 2024 to fund an installation of an estimated 32-36 heat pumps in low-income household electrification projects (dwelling units).³⁰ Energy Smart Eastside is a climate initiative of the Cities of Bellevue, Issaquah, Kirkland, Mercer Island, and

²⁷ Based on the needs of each property, the homes approved for this program may be eligible for the following: insulation, HVAC (heating, ventilation, and air conditioning) system (either a central heat pump or ductless heat pump), duct sealing, single-pane window replacement with double-pane windows, smart thermostat, and hybrid/heat pump water heater. If repairs are needed for the efficiency upgrades, Tacoma Power can assist with repair costs. Source: *Tacoma Power*. Incentives for Rental Properties Serving Income-Qualified Tenants webpage, last accessed May 1, 2024. <<https://www.mytpu.org/ways-to-save/rental-property-resources/income-qualified-rental-property-incentives/>>

²⁸ *Tacoma Power*. Incentives for Rental Properties Serving Income-Qualified Tenants webpage, last accessed May 1, 2024. <<https://www.mytpu.org/ways-to-save/rental-property-resources/income-qualified-rental-property-incentives/>>

²⁹ *PSE Named Communities maps*, accessed May 1, 2024. <<https://pugetsoundenergy.maps.arcgis.com/apps/mapviewer/index.html?webmap=55b43c36edd44731992f4e207dc19f70>>

³⁰ Again, this number of low-income households that would receive electrification benefits is an estimate because each individual project would vary in cost, depending on the needs of each household project. In addition, the ultimate number of customers served would also depend on customers’ uptake and willingness and ability to follow through with the decarbonization / targeted electrification project.

Redmond.³¹ The program is funded by city dollars matched with grants from Washington Department of Commerce Clean Energy Fund and Washington State University Community Energy Efficiency Programs. ESE works with the CAP/CAA agency Hopelink to provide outreach, income-qualification verification, and case management for residents accepted into the ESE heat pump program who would benefit from switching their natural gas space heating to a heat pump system. ESE works with HVAC distributor Gensco on heat pump dealer education, incentives, and workforce development initiatives.³² The ESE program completed 20 heat pump electrification projects in 2023. PSE's ESE partnership would fund an expansion of the program in 2024. PSE's CCA Decarb Program ESE partnership will fund electrification conversions from natural gas space heat to cold-climate heat pumps for PSE's income-qualified customers, some of which might also be in a Named Community. All customers in the Cities of Bellevue, Issaquah, Kirkland, Mercer Island, and Redmond are PSE's combined electric and gas customers.

(4) Community Action Partnership Agency Capacity Support

23 For (4), the Decarbonization and weatherization program capacity building support for CAP/CAA Agencies, PSE's CCA Decarb Program would provide approximately \$1 million to three CAP/CAA Agencies: King County Housing Authority (KCHA), Community Action Council of Lewis/Mason/Thurston Counties (CAC LMT), and HomeWise. The CAP/CAA Agency Capacity support would go towards agency staff and contractor education, as well as agency decarbonization program staffing in preparation for decarbonization projects in 2025-

³¹ *Energy Smart Eastside*. About us webpage, last accessed May 1, 2024.

<<https://www.energysmarteastside.org/about-us>>

³² *See id.*

2026. PSE worked with the CAP/CAA Agencies, as well as The Energy Project, through one-on-one and group discussions, to determine the budget allocations to the Agencies to fund estimated 2024-2025 staffing and training needs. The final allocations from PSEs CCA Decarb Program's 2024 funding are as follows: KCHA is to receive \$500,000, CAC LMT is to receive \$250,000, and HomeWise is to receive \$247,000 - for agencies' staffing and training estimates for 2024 and 2025. All interested parties were supportive of PSE's CCA Decarb Program funding support for CAP/CAA agencies to increase capacity to be able to do more decarbonization projects in 2025-2026.

Multi-Family Residential

24 In the multi-family residential program segment, PSE worked with interested parties and interested partners to identify focus projects and partnerships for 2024:

(5) Penn Hall Apartments (Seattle HomeWise) project partnership and

(6) Multi-family Direct Installs (MFDI) PSE CCA Decarb Program.

(5) Penn Hall Apartments Project Partnership with Seattle HomeWise

25 For (5), the Penn Hall Apartments project, PSE plans to partner with Seattle HomeWise to fund the cost of electrifying two central natural gas water heaters, budgeted at \$65,000. Penn Hall Apartments has 30 verified low-income units and is located in a Highly Impacted Community.

(6) PSE Multi-Family Direct Installs (MFDI) program

26 For (6), PSE's Multi-family Direct Installs (MFDI) program would leverage the MFDI program design under PSE's ongoing Targeted Electrification Pilot – focusing on upgrading

space and/or water heating gas systems to heat pumps. The CCA Decarb Program’s MFDI program would be administered by PSE, where PSE would work with building owners, to fund about \$510,000 for 2 additional multi-family buildings³³ in 2024. PSE’s CCA Decarb MFDI program plans to serve PSE’s low-income residential natural gas and electric customers, potentially in Named Communities, by covering the full cost of direct installation of the space and/or water heating heat pump conversions. PSE plans to leverage the pool of customers from previous multi-family rebate participants to target customers for outreach and PSE plans to bundle these CCA Decarb Program benefits with the conservation measures offered through the multi-family retrofit program such as weatherization, lighting, and other upgrades.

PSE Small Business Direct Installs (SBDI) Program

- 27 In the small business program segment, PSE worked with interested parties to identify program design for 2024:
- 28 PSE plans to administer this program focusing on dual fuel customers (PSE’s natural gas and electric small business customers) in PSE’s Named Communities to fund upgrades of space and/or water heating gas systems to heat pumps. PSE’s CCA Decarb Program’s SBDI program plans to spend \$200,000 on approximately 10 small businesses in 2024.³⁴

³³ Again, this number of multi-family projects is an estimate because each individual project would vary in size and cost, depending on the needs of each multi-family project. In addition, the ultimate number of customers served would also depend on customers’ uptake and willingness and ability to follow through with the decarbonization / targeted electrification project.

³⁴ Again, this number of small business projects is an estimate because each individual project would vary in size and cost, depending on the needs of each small business project. In addition, the ultimate number of customers served would also depend on customers’ uptake and willingness and ability to follow through with the decarbonization / targeted electrification project.

29 The definition of small business that is in PSE’s natural gas tariff Schedule WN U-2, Schedule 111, Greenhouse Gas Emissions Cap, and Invest Adjustment:

Small Business means any business entity, that is owned and operated independently from all other businesses, and that has 50 or fewer employees at that premise. The qualifying Small Business must be a licensed for-profit business having 4-year average gross annual receipts not exceeding \$30.4 million.³⁵

PSE received feedback from interested parties that this definition should be expanded to include not-for-profit small business organizations and community-based organizations. PSE agrees with this feedback and plans to incorporate this feedback in a future filing this fall.

Summary Table

30 See Figure 1 below for the summary of the final 2024 CCA Decarb Program Design on which PSE consulted with interested parties during the first quarter of 2024.

Figure 1. 2024 PSE’s CCA Decarb Program Design Summary

2024 Summary Matrix	Single-Family Residential				Multi-Family Residential		PSE Small Business Direct Installs (SBDI)
	High Point (HomeWise) Direct Installs	Income-Qualified Rental Program (IQRP) Direct Installs	Energy Smart Eastside (ESE) Direct Installs	CAP/CAA Agency Capacity Support	Penn Hall Apartments (HomeWise)	PSE Multi-Family Direct Installs (MFDI)	
Partners	<ul style="list-style-type: none"> Seattle HomeWise Seattle Housing Authority (SHA) 	<ul style="list-style-type: none"> Tacoma Power 	<ul style="list-style-type: none"> Energy Smart Eastside Eastside Cities 	<ul style="list-style-type: none"> Low-income weatherization CAP/CAA Agencies 	<ul style="list-style-type: none"> Seattle HomeWise Agency 	<ul style="list-style-type: none"> Building Owners 	<ul style="list-style-type: none"> PSE Implementers
Est. Units	2024: 53 homes	2024: 25 homes	2024: 32-36 homes	N/A	2024: 30 homes	2024: 2 buildings	2024: 10 businesses
Est. Total CCA Spend*	\$2.76M	\$800,000	\$850,000	\$997,000	\$65,000	\$510,000	\$200,000
Decarb Technologies	<ul style="list-style-type: none"> Space and/or water heat 	<ul style="list-style-type: none"> Space and/or water heat 	<ul style="list-style-type: none"> Space heat 	N/A	<ul style="list-style-type: none"> Central water heat 	<ul style="list-style-type: none"> Space and/or water heat 	<ul style="list-style-type: none"> Space and/or water heat
Customer Segment	<ul style="list-style-type: none"> Low-Income Named Community Renters PSE gas only 	<ul style="list-style-type: none"> Low-Income Potential - Named Community Renters PSE gas only 	<ul style="list-style-type: none"> Low-Income Potential - Named Community Owners & Renters PSE dual fuel 	N/A	<ul style="list-style-type: none"> Low-Income Named Community Renters 	<ul style="list-style-type: none"> Low-Income Potential - Named Community Owners & Renters PSE dual-fuel 	<ul style="list-style-type: none"> Small Business Named Community Owners & Renters PSE dual-fuel
Income Qualification	HomeWise	Tacoma Power	Hopelink Agency	N/A	HomeWise	PSE Bill Discount Rate	N/A

*Remaining \$1.49M is for estimated overhead costs such as administrative, staff, and evaluation costs.

³⁵ Puget Sound Energy. Natural Gas Tariff Schedule WN U-2, Schedule 111, Greenhouse Gas Emissions Cap, and Invest Adjustment, Original Sheet No. 1111-C.1 (Issued: November 22, 2023; Effective: January 1, 2024).

DATED this 30th day of May, 2024.

Puget Sound Energy

By /s/ Wendy Gerlitz _____

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