

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of

DOCKET U-180680

**PUGET SOUND ENERGY, ALBERTA
INVESTMENT MANAGEMENT
CORPORATION, BRITISH
COLUMBIA INVESTMENT
MANAGEMENT CORPORATION,
OMERS ADMINISTRATION
CORPORATION, and PGGM
VERMOGENSBEHEER B.V.**

**For an Order Authorizing Proposed Sales
of Indirect Interest in Puget Sound
Energy**

TESTIMONY OF

SHAWN M. COLLINS (EXH. SMC-1T)

**DIRECTOR OF
THE ENERGY PROJECT**

In Support of Multiparty Settlement Stipulation

January 18, 2019

1 **I. INTRODUCTION**

2 **Q: Please state your name and business address.**

3 A: I am Shawn Collins. My business address is 3406 Redwood Avenue, Bellingham,
4 WA 98225.

5 **Q: By whom are you employed and in what capacity?**

6 A: I am the Director of The Energy Project (TEP), a program of the Washington
7 State Community Action Partnership housed at the Opportunity Council in
8 Bellingham, WA.

9 **Q: Would you please state your educational and professional background?**

10 A: My educational and professional background is described in attached Exh. SMC-
11 2.

12 **Q: On whose behalf are you testifying?**

13 A: I am testifying for TEP, an intervenor in this proceeding, on behalf of the
14 Community Action Partnership (CAP) organizations that provide low-income
15 energy efficiency and bill payment assistance for customers in Puget Sound
16 Energy's (PSE) service territory. These agencies include: Centerstone;
17 Community Action Council of Lewis, Mason, Thurston; Community Action of
18 Skagit County; Hopelink; Hopesource; Metropolitan Development Council;
19 Multi-service Center; Kitsap Community Resources; Opportunity Council; Pierce
20 County Community Action and Snohomish County Community Action.

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II. PURPOSE OF TESTIMONY

Q: Could you please summarize the purpose of your testimony?

A: The purpose of my testimony is to provide support for approval of the Multiparty Settlement Stipulation and Agreement (Settlement) in this docket, filed with the Commission on January 15, 2019. My testimony focuses on the elements of the Settlement that impact low-income populations within PSEs service territory and explains why TEP believes the Settlement is in the public interest.

Q: Please briefly address the case process.

A: The Energy Project joined with other parties in requesting that the Joint Application be reviewed in an adjudication. The Commission’s decision to set the request for adjudication allowed TEP sufficient time to evaluate the request and the proposed commitments in more detail, to conduct discovery, review other parties’ discovery, confer with other parties, and prepare TEP’s case. This enabled The Energy Project to participate effectively in settlement negotiations with the Joint Applicants and the other parties. The establishment of the adjudication helped facilitate a reasonable resolution of the case.

III. DISCUSSION OF LOW-INCOME ISSUES

Q: Did The Energy Project have concerns with the request for approval of the Joint Application as initially filed?

A: Yes. As filed, The Energy Project did not believe the proposed transaction met the public interest standard for approval of such transactions in Washington. The transfer to new consortium participants and the proposed modifications to the

1 commitments from the 2008 Acquisition created uncertainties regarding ongoing
2 support for low-income programs and customers, as well as in other areas. As a
3 result of the commitments discussed below, however, TEP believes that its
4 concerns have been adequately addressed by the terms of the Settlement.

5 **Q: Can you provide an overview of the key elements of the Settlement that**
6 **address low-income issues?**

7 A: The Settlement includes a number of important components that are in the public
8 interest from the perspective of low-income customers. These include
9 commitments to:

- 10 • Maintain existing low-income programs and to increase budgeted low-
11 income weatherization funding at a level commensurate with increases in
12 energy efficiency funding for other residential customers.
- 13 • Continue to work with low-income agencies to address issues of low-
14 income customers.
- 15 • Continue bill assistance benefits under the HELP program, without
16 precluding parties or the Commission from considering increases to HELP
17 funding in future cases.
- 18 • Continue to fund feasible low-income weatherization programs proposed
19 by agencies, and to maintain a base-level of funding of no less than \$4.43
20 million through 2022.

- 1 • Continue existing annual shareholder contributions to weatherization of
2 \$400,000, with an additional one-time shareholder contribution of \$2
3 million disbursed over a five-year period.
- 4 • Continue the annual weatherization funding supplement of \$500,000
5 established in the initial decoupling order for as long as decoupling
6 continues.
- 7 • Contribute financial and staff resources to a low-income needs assessment
8 to evaluate energy affordability, including energy efficiency and
9 weatherization needs.
- 10 • Maintain a project cost allowance of 30 percent for the delivery of low-
11 income weatherization.
- 12 • Take reasonable steps to include equitable participation of low-income
13 households in renewable energy programs available to residential
14 customers.
- 15 • Continue to consult with the low-income advisory committee in the
16 deployment of the Get To Zero initiative.

17 **Q: Please address how the low-income bill assistance, energy efficiency and**
18 **weatherization commitments help meet the public interest standard.**

19 A: With regard to bill assistance, the Joint Applicants have provided a specific
20 confirmation of their commitment to the multiple components of HELP funding,
21 as described in more detail in the annual HELP funding reports filed by PSE. The
22 commitment also confirms that parties or the Commission in future proceedings

1 can explore opportunities for additional HELP funding where appropriate. This is
2 important because of the on-going challenge of expanding the reach of the HELP
3 program to the substantial numbers of low-income customer who are not
4 participating.

5 Low-income weatherization provides a demand-side resource that benefits
6 the Company, its customers generally, ensures equity in energy efficiency
7 investments, and specifically helps low-income customers by contributing to the
8 long-term affordability and livability of low-income housing stock. The
9 commitments listed above clarify and confirm support for and continuation of the
10 components of PSE's low-income weatherization program, including shareholder
11 support, maintain the project cost allowance, and establish a base level of funding.
12 A needs assessment study will include evaluation of low-income energy
13 efficiency. As a package, these commitments provide assurances that PSE's
14 existing programs will continue to be supported by the PSE and its new owners.

15 This set of commitments gives TEP comfort that the transaction will not
16 result in harm to PSE's low-income programs or customers and will serve the
17 public interest.

18 **Q: Are there other commitments that are significant for low-income customers?**

19 **A:** Yes. One important policy objective of TEP is to advance greater equity for low-
20 income customers and other vulnerable groups as major energy policy decisions
21 are made. This includes ensuring that low-income customers are able to
22 materially benefit from investments in renewable and other related environmental

1 initiatives, rather than simply being asked to pay the costs. The Settlement
2 addresses this issue through PSE's commitment to include equitable participation
3 of low-income households in renewable energy programs available to residential
4 customers.

5 Another concern of TEP is that PSE's Get to Zero initiative be deployed in
6 a manner that does not negatively impact low-income customers access to service,
7 for example, when paying bills and seeking to resolve delinquency and potential
8 disconnection issues. PSE's agreement to consult with the low-income advisory
9 committee as it implements Get To Zero is helpful in addressing this issue.

10 Finally, PSE's commitment to support a low-income needs assessment
11 addresses the broader need to understand energy affordability in the substantial
12 portion of PSE's customer base that faces economic challenges. The results of the
13 assessment will help guide future program development for bill assistance and
14 weatherization.

15 IV. CONCLUSION

16 **Q: Does The Energy Project support approval of the Settlement?**

17 A: Yes. The Energy Project believes that the Settlement commitments establish that
18 the Joint Applicants' proposed transaction meets the statutory requirement that the
19 transaction must be in the public interest. The Energy Project recommends that
20 the Settlement be approved by the Commission.

21

1 **Q: Does this conclude your testimony?**

2 A: Yes.