

## WUTC Data Request 29

**Equity** - In the testimony of Company witness Medina, (Exh. CMM-1T) from page 4 line 17, to page 11 line 13, the Company outlines a list of actions and proposals that are intended to demonstrate that PacifiCorp “included equity considerations in this case[]”. Exh. CMM-1T at 4:17. This list includes the following items:

1. Proposals by Company witness Robert M. Meredith to replace tiered energy charges with seasonal energy charges, and splitting the Basic Charge into two separate charges for customers living in single-family and multi-family dwellings.
2. Constructing two new substations with new 115 kV transmission lines.
3. Revamp its North Temple Property, located in an area and community that is economically disenfranchised, where it will build new corporate facilities.
4. Formed an Equity Advisory Group.
5. Developed Customer Benefit Indicators
6. Proposed utility actions within the CEIP
7. Modified the Low-Income Bill Assistance Program
8. Residential Energy Efficiency
9. Small Business Energy Efficiency
10. Residential Energy Usage Survey
11. COVID-19 Bill Assistance Program
12. Disconnection Moratorium
13. On-Bill Financing
14. Marketing of programs to increase participation

For each of these items, please separately provide the following:

- (a) Any contemporaneous documentation that demonstrates Pacificorp considered distributional justice at the time the Company made the decision to take or propose this action.
- (b) Any contemporaneous documentation that demonstrates Pacificorp considered recognition justice at the time the Company made the decision to take or propose this action.
- (c) For each item, please indicate whether or not PacifiCorp believes the action or proposed action is required to comply with any statute, commission rule, or commission order other than the equity requirement under RCW 80.28.425(1). In other words, for each item please indicate whether or not PacifiCorp believes that it would need to take this action or proposed action anyway to comply with other legal requirements.

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- (d) For each item, please indicate the total estimated costs incurred by the Company in RY1 and the total estimated cost incurred by the Company in RY2 related to that item.
- (e) Please provide a total estimated cost for implementing all the items above in RY1 and the same for RY2.
- (f) For the answers provided to subsection e above, please indicate the estimated costs for RY1 and RY2 that PacifiCorp believes it would need to incur anyway in the absence of RCW 80.28.425(1)'s equity requirement.

### **Response to WUTC Data Request 29**

PacifiCorp assumes that the reference to “distributional justice” and “recognition justice” are references to guidance provided by the Washington Utilities and Transportation Commission (WUTC) in paragraph 56 of Order 09 issued on August 23, 2022, in Docket UG-210755. The WUTC’s guidance regarding distributional justice and recognition justice was issued on August 23, 2022, as part of the proceedings involving Cascade Natural Gas, Inc., in Order 09 within Docket UG-210755 (Order 09). PacifiCorp notes that it filed its multi-year rate plan (MYRP) within seven months after this issuance of this guidance, specifically on March 17, 2023. Many of the decisions pertaining to the listed items in this data request were made prior to August 23, 2022. PacifiCorp objects to the extent that this data request is premised on the assumption that Order 09 imposes an evidentiary standard mandating the creation, retention, and/or production of certain documentation. Based on the foregoing assumption, and without waiving the foregoing objection, PacifiCorp responds and follows:

- (a) For the purposes of the response to this subpart, please refer to the following link for access to publicly available slide decks, meeting notes, agendas, and workplans from the Equity Advisory Group (EAG) and Demand-Side Management (DSM) Advisory Group, dating back to April 28, 2021:

<https://www.pacificorp.com/energy/washington-clean-energy-transformation-act-equity.html>

1. Please refer to the Company’s response to WUTC Data Request 27.
2. Please refer to the Company’s response to WUTC Data Request 25.
3. Please refer to the Company’s response to WUTC Data Request 26.
4. Please refer to presentation materials and notes for the first EAG meeting held on May 13, 2021, which includes the characteristics of EAG membership, member introductions, as well as purpose and goals for the

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engagement process. At the second EAG Meeting on June 16, 2021, PacifiCorp presented results regarding the identification of Highly Impacted Communities in its Washington service area based on criteria from the Washington Department of Health. PacifiCorp also asked the EAG to identify vulnerable populations that might not be captured in the definition of a Highly Impacted Community and the challenges that vulnerable populations face. Please also refer to the presentation materials for EAG meeting held on December 7, 2022. The meeting materials include areas of influence by EAG members and communications on recruitment to expand the group.

5. Initial discussions on customer benefit indicators with the EAG started on July 21, 2021, and continue today. Please refer to publicly published presentation materials for the following EAG sessions: July 21, 2021, August 18, 2021, September 15, 2021, October 20, 2021, November 17, 2021, July 13, 2022, and July 23, 2023. Similar discussions took place with the Demand-Side Management (DSM) Advisory Group and continue today. Please refer to publicly published presentation materials for the following DSM Advisory Group meetings: June 17, 2021, July 22, 2021, June 28, 2022, September 8, 2022, and March 30, 2023.
6. Proposed utility actions were discussed with the EAG on September 15, 2021, October 20, 2021, and November 17, 2021, before filing its draft Clean Energy Implementation Plan (CEIP) on December 30, 2021 (see link above). Please also refer to presentation materials for the EAG meetings held on July 13, 2022, and February 23, 2023, for a review of the status of utility actions. Energy efficiency presentations were provided to the EAG at the February 16, 2022, June 15, 2022, and September 14, 2022 meetings. For energy efficiency utility actions, please refer to the following filings: DSM Business Plan in the 2022-2023 Biennial Conservation Plan in Docket [UE-210830](#) filed November 1, 2021; Advice 21-13 in Docket [UE-210973](#) filed December 21, 2021; Clean Energy Implementation Plan (CEIP) in Docket [UE-210829](#) filed December 30, 2021; 2023 Annual Conservation Plan in Docket [UE-210830](#) filed November 15, 2022. Please also refer to the following DSM Advisory Group meeting presentation materials: October 12, 2021, February 28, 2022, April 28, 2022, June 28, 2022, September 8, 2022, and March 30, 2023.
7. Please refer to Attachment WUTC 29-1, which includes presentations and emails (internal and external) with the Low Income Advisory Committee regarding Low Income Bill Assistance (LIBA) program modifications. The Low Income Advisory Committee were involved in the discussions and the final modifications to the program.

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8. Please refer to the Company's response to subpart (6) above, as well as to the presentation materials for the DSM Advisory Group held on December 14, 2022.
9. Please refer to the presentation materials for the February 16, 2022 and February 9, 2023 EAG meetings. For energy efficiency utility actions related to small business, please refer to the following filings: DSM Business Plan in the 2022-2023 Biennial Conservation Plan in Docket [UE-210830](#) filed November 1, 2021, CEIP in Docket [UE-210829](#) filed December 30, 2021 and the 2023 Annual Conservation Plan in Docket [UE-210830](#) filed November 15, 2022. Please also refer to the presentation materials for the following DSM Advisory Group meetings: October 12, 2021, February 28, 2022, April 28, 2022, June 28, 2022, September 8, 2022 and March 30, 2023.
10. Please refer to the presentation materials for the EAG meetings on August 18, 2021, and June 8, 2023, which provide information on how PacifiCorp has included equity considerations within its Residential Energy Usage Surveys.
11. Please refer to Attachment WUTC 29-2, which provides copies of Pacific Power's COVID-19 pandemic bill assistance initial draft plan and final plan incorporating feedback from Low Income Advisory Committee before filing and implementation. PacifiCorp held multiple meetings with its Low Income Advisory Committee to establish and implement a new bill payment assistance program designed to provide relief for income-qualified customers with arrearages resulting from economic hardships due to the COVID-19 pandemic.
12. Please refer to the presentation materials for the EAG held on October 19, 2022.
13. Please refer to the presentation materials on on-bill financing from the April 28, 2022, and June 28, 2022 DSM Advisory Group meetings. A Craft3 presentation was delivered to the EAG on January 12, 2023.

For energy efficiency pilots related to on-bill financing (Craft3 Home Energy Loans), please refer to the following filings: DSM Business Plan in the 2022-2023 Biennial Conservation Plan in Docket [UE-210830](#) filed November 1, 2021; the 2021 DSM Annual Conservation Report in Docket [UE-190908](#) filed June 2022; and the 2023 Annual Conservation Plan in Docket [UE-210830](#) filed November 15, 2022.

14. Please refer to WUTC Attachment 29-4, which provides documents pertaining to 2020-2022 accomplishments regarding highly impacted

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community (HIC) customer outreach; enhanced incentives for HIC customers; and new web portal for customers and contractors to lookup meters to see if the customer is eligible for enhanced incentives.

Please refer to WUTC Attachment 29-5, which provides documents pertaining to low-income bill assistance. Low Income Bill Assistance information is also available on the program website and collateral is printed and available at community engagement events.

Please refer to WUTC Attachment 29-6, which provides documents pertaining to increased program outreach to Spanish speaking customers. Translation services used to create these market materials employ true or natural language that embodies culture into the communication rather than a word-for-word translation.

PacifiCorp uses information from customers, communities, stakeholders, and contractors to develop communications and marketing plans with the aim to reach all customers, including customers in named communities. On July 30, 2021, PacifiCorp filed its revised CEIP Public Participation Plan. Public outreach methods were further refined in Chapter 5 of the draft CEIP. Current plans include communications and outreach in English and Spanish in Washington. Communications updates, and feedback sessions with the EAG; content and materials may be referenced April 13, 2023, June 8, 2023, and July 13, 2023. Communications updates for the DSM Advisory Group are available in the presentation materials for the following meetings: April 28, 2021, February 28, 2022, and December 14, 2022.

- (b) Please refer to the Company's response to subpart (a) above.
- (c) PacifiCorp objects to this data request as it calls for legal conclusions and is not reasonably calculated to lead to the discovery of admissible information.
- (d) Please refer to Attachment WUTC 29-3, which provides total estimated costs included by the Company in rate year 1 (RY1) and rate year 2 (RY2) of its proposed MYRP for each action item outlined above in this data request response.
- (e) Please refer to the Company's response to subpart (d) above.
- (f) PacifiCorp has not performed the requested analysis.

PREPARER: Various

SPONSOR: To Be Determined