

**EXH. RDC-8  
DOCKET UE-210795  
2022 PSE CEIP  
WITNESS: ROGER D. COLTON**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of  
PUGET SOUND ENERGY, INC.  
2021 Clean Energy Implementation Plan

**Docket UE-210795**

**SEVENTH EXHIBIT TO THE PREFILED RESPONSE TESTIMONY OF  
ROGER D. COLTON  
ON BEHALF OF NW ENERGY COALITION AND FRONT AND CENTERED**

**OCTOBER 10, 2022**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UE-210795  
Puget Sound Energy  
PSE 2021 Clean Energy Implementation Plan**

**FRONT AND CENTERED AND NW ENERGY COALITION DATA REQUEST NO. 049:**

**DATA REQUESTS DIRECTED TO: Kara Durbin**

**Re: Equity Data**

Please identify all communities that appear on more than one of the following lists (indicating for each community each list they appear on):

- a. High needs communities;
- b. Communities with high energy burdens;
- c. Highly impacted communities;
- d. Targeted Demand-Side Measures (TDSM) communities;
- e. Communities with high concentrations of hard-to-reach customers;
- f. Communities with high concentrations of potentially under-served customers.

**Response:**

Puget Sound Energy (“PSE”) can provide data related to the following categorizations: a) high needs communities; c) highly impacted communities; d) targeted demand-side management (“TDSM”) communities; and f) potentially under-served communities. Please see Attachment A to PSE’s Response to Front and Centered and NW Energy Coalition Data Request No. 049, the Low Income Needs Assessment (“LINA”) report, and Attachment B to PSE’s Response to Front and Centered and NW Energy Coalition Data Request No. 049, a spreadsheet that includes census block groups in PSE’s service area, with columns indicating whether each block group is a) high needs community, c) highly impacted community, d) TDSM community, and/or f) underserved community.

Each requested category is explained individually below.

For a) high needs communities, please see Attachment A, the LINA report, which designated two different methods for quantifying a high needs community, which are reflected in the data provided as *High Needs Community V1* and *High Needs Community V2*.

PSE is unable to provide data for b) communities with high energy burden, as no definition exists in either PSE's analysis or in the Washington Utilities and Transportation Commission's ("WUTC") rulings as to what constitutes a *community* with high energy burden. PSE's Energy Burden Analysis estimates energy burden at the household level but does not quantify or define communities (such as census block groups) as being either highly energy burdened or not highly energy burdened. Please see PSE's Response to Front and Centered and NW Energy Coalition's Data Request No. 032 for additional information.

For c) highly impacted communities, please see the delineation of highly impacted communities as described in the Clean Energy Implementation Plan ("CEIP") on page 51 and on pages 59 through 63.

For d) TDSM communities, please see the census block groups within PSE's service area that have taken part in TDSM programs, which are listed in Attachment B to PSE's Response to Front and Centered and NW Energy Coalition Data Request No. 049.

PSE is unable to provide data for e) communities with high concentrations of hard-to-reach customers, as no definition exists, either in PSE's analysis or in a WUTC ruling, of what constitutes a community with high concentrations of hard-to-reach customers. This terminology is based on language used before the CEIP incorporated the definition of "named communities." The wording "hard-to-reach" is a legacy term that PSE no longer plans to use, in favor of focusing on "named communities," consistent with the CEIP.

For f), communities with high concentrations of potentially underserved customers, please see Attachment A to PSE's Response to Front and Centered and NW Energy Coalition Data Request No. 049, the LINA report. Puget Sound Energy's ("PSE") use of the term "potentially underserved customers" was a qualitative term that originated from the Northwest Power and Conservation Council 7<sup>th</sup> Power Plan. The LINA report, which focused on low-income customers, not the overall PSE customer base, introduced a quantitative analysis of the term "potentially underserved customers." The wording "potentially underserved" is a legacy term that PSE no longer plans to use, in favor of focusing on "named communities," consistent with the CEIP.