

Exh. JS-1T
Docket UE-210829

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP d/b/a
PACIFIC POWER & LIGHT COMPANY'S

Clean Energy Implementation Plan

Docket UE-210829

**JOINT SETTLEMENT TESTIMONY OF
PACIFICORP, COMMISSION STAFF, NW ENERGY COALITION, SIERRA
CLUB, AND THE ENERGY PROJECT**

September 2023

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1 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

2 **Q. What is the purpose of this pre-filed joint testimony (Joint Testimony)?**

3 A. This Joint Testimony recommends that the Washington Utilities and Transportation
4 Commission (Commission) approve the Joint Settlement Agreement (Settlement or
5 Agreement) regarding PacifiCorp’s 2021 Clean Energy Implementation Plan
6 (Revised CEIP),¹ entered into by PacifiCorp d/b/a Pacific Power (PacifiCorp or
7 Company), Commission Staff (Staff), the Public Counsel Unit of the Washington
8 State Office of the Attorney General (Public Counsel),² the Sierra Club, NW Energy
9 Coalition (NWEC), and The Energy Project.

10 The Agreement resolves all issues in this proceeding and is a full multi-party
11 settlement as defined in WAC 480-07-730(3)(a). The only other party in this case that
12 has not joined the Agreement, the Alliance of Western Energy Consumers (AWEC),
13 does not oppose the Agreement.

14 **Q. Please state your names, titles, and the Settling Party you represent in this Joint**
15 **Testimony.**

16 A. Our names, titles, entities that we represent include:

- 17 • Matthew D. McVee, Vice President, Regulatory Policy and Operations,
18 PacifiCorp.
- 19 • Molly A. Brewer, Regulatory Analyst, Staff.
- 20 • Lauren C. McCloy, Policy Director, NWEC.
- 21 • Lindsay Beebe, State Lobbying and Advocacy Representative, Sierra Club.

¹ *In re PacifiCorp’s 2021 CEIP*, Docket No. UE-210829, Revised 2021 CEIP (Mar. 13, 2023).

² Public Counsel will submit separate Settlement Testimony that provides its position in support of the Agreement.

1 • Shaylee Stokes, Director, The Energy Project.

2 **Q. What are your recommendations?**

3 A. We recommend the Commission approve PacifiCorp's Revised CEIP, subject to
4 several additional conditions (CEIP Conditions or Commitments) and acknowledge
5 that the Company will update the CEIP interim targets in the Company's 2023
6 Biennial CEIP update to address several issues and assumptions.

7 **II. OVERVIEW OF PACIFICORP'S REVISED CEIP**

8 **Q. Can you provide a general overview of PacifiCorp's CEIP?**

9 A. Yes. As noted in PacifiCorp's CEIP Executive Summary, the Company has been on
10 an independent trajectory to economically develop clean energy across its six-state
11 service territory since at least its 2017 IRP.³ As of 2020, twenty-two percent of the
12 Company's Washington retail customers were served by renewable and non-emitting
13 energy,⁴ and this creates a strong foundation for the Company to continue its journey
14 to achieve CETA's ambitious requirements.

15 While achieving 100 percent clean energy for Washington customers by 2045
16 is not without obstacles, the Company anticipates that for the first compliance period
17 through 2025, it will cost on average approximately \$2.59 million annually to comply
18 with CETA (including both supply and demand side resource costs, as well as public
19 engagement costs).⁵ This amounts to approximately a 0.77 percent annual increase in
20 customer rates,⁶ and is materially below the Commission's two percent threshold for
21 alternative compliance. Based on then-current forecasted Washington revenues,

³ Revised CEIP, at 5.

⁴ *Id.*

⁵ *Id.* at 100, Table 4.3.

⁶ *Id.* at 95.

1 alternative compliance would only become relevant if the Company's annual
2 incremental costs to comply with CETA exceeded \$16.67 million.⁷

3 **Q. Can you discuss PacifiCorp's engagement with its interested parties prior to**
4 **filing the CEIP?**

5 A. Yes. Over the course of 2021, the Company held over twenty half-day meetings,
6 technical conferences, or workshops with the Company's newly created Washington
7 Equity Advisory Group (EAG), Demand-Side Management (DSM) Advisory Group,
8 Low-Income Advisory Committee, and general PacifiCorp customers.⁸ These
9 meetings were in addition to the Company's bi-monthly meetings with Commission
10 Staff to discuss specific CEIP concerns, and engagement with various Commission
11 technical workshops and rulemaking proceedings on discrete CEIP implementation
12 issues.

13 As a result of these discussions the Company: expanded its low-income
14 weatherization plan;⁹ developed a comprehensive set of initial customer benefit
15 indicators;¹⁰ developed a strategy for the Company's DSM Business Plan and 2021
16 demand side request for proposals;¹¹ created on-bill financing for customers to invest
17 in residential energy savings projects;¹² established an electric vehicle grant
18 program;¹³ modified its Low-Income Bill Assistance (LIBA) program;¹⁴ and finalized
19 an energy burden assessment and residential energy usage survey.¹⁵ The Company

⁷ *Id.* at 95.

⁸ PacifiCorp Revised CEIP, at 107, Table 5.2

⁹ *See, e.g., In re PacifiCorp's 2023 Annual Conservation Plan*, Docket UE-210830 (Nov. 15, 2022).

¹⁰ 2023 PPP, at 4.

¹¹ Revised CEIP, at 77.

¹² 2023 PPP, at 4.

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

1 also addressed significant barriers to participation, stemming from both the COVID-
2 19 pandemic, and customer-specific language, cultural, and economic
3 considerations.¹⁶ These actions informed the Company's inaugural CEIP that was
4 filed with the Commission on December 30, 2021.

5 **Q. Can you discuss PacifiCorp's engagement with its interested parties after filing**
6 **the CEIP?**

7 A. Yes. After the Company filed the Initial CEIP, the Commission provided an
8 opportunity for interested parties to comment, and subsequently received comments
9 from Commission Staff, Public Counsel, Sierra Club, Renewable Northwest, NWEC,
10 The Energy Project, AWEC, and Pete Werner. Together, these interested parties
11 provided approximately eighty comments on various subjects, ranging from general
12 comments, to CBI's, to specific actions, to incremental costs.

13 Afterwards, the Company facilitated two public workshops with all CEIP
14 interested parties to discuss these written comments and the Company's responses to
15 each, the first held on August 31, 2022, and the second on September 21, 2022. As a
16 result of these workshops, 11 comments were resolved, 52 could potentially be
17 resolved based on additional individual discussions or group workshops, and 14 were
18 left unresolved. The results of these workshops are available on the Company's CEIP
19 landing page.¹⁷

¹⁶ CEIP, at 109–111.

¹⁷ Available here: <https://www.pacificorp.com/energy/washington-clean-energy-transformation-act-equity.html>.

1 **Q. Has the Company continued to engage with its interested parties in other**
2 **channels?**

3 A. Yes. The Company has continued to facilitate discussions and engage with its CEIP
4 interested parties, and most of these channels are reflected in the Company's 2023
5 Public Participation Plan (PPP) recently filed with the Commission,¹⁸ and materials
6 from these channels from 2021 through the present can be accessed from the
7 Company's CEIP website.¹⁹

8 **Q. Can you provide an overview of the Company's Initial and Revised CEIPs?**

9 A. Yes. The Initial CEIP was filed December 30, 2021.²⁰ The Initial CEIP was informed
10 by the Company's 2021 IRP filed with the Commission in September of 2021,²¹ and
11 was the result of a several years-long stakeholder process to inform the Company's
12 20-year planning document that began in early 2020.²²

13 In June of 2022, Commission Staff filed an administrative complaint against
14 the Company regarding the modeling and incorporation of the social cost of
15 greenhouse gases (SCGHG) in the Initial CEIP.²³ The complaint was resolved a year
16 later when Commission Staff moved to withdraw the complaint in February of 2023
17 following a settlement entered into among some of the parties (Complaint
18 Settlement).²⁴ The Commission granted Staff's motion to withdraw and consistent

¹⁸ 2023 PPP available here:

<https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/ceip/210305-WA%20UE-210305%20PAC-PPP-5-01-23.pdf>.

¹⁹ Available here: <https://www.pacificorp.com/energy/washington-clean-energy-transformation-act-equity.html>.

²⁰ *In re PacifiCorp's 2021 CEIP*, Docket No. UE-210829, Final 2021 CEIP, at 7, Figure 1.1 (available here: <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=85&year=2021&docketNumber=210829>).

²¹ *In re PacifiCorp's 2021 IRP*, Docket No. UE-220420, 2021 Final IRP (Sept. 1, 2021).

²² *In re PacifiCorp's 2021 IRP*, Docket No. UE-220420, 2021 IRP Work Plan (Mar. 20, 2020).

²³ *In re PacifiCorp CEIP Complaint*, Docket No. UE-220376, Complaint and Notice of Prehearing Conference (Jun. 6, 2022).

²⁴ *In re PacifiCorp CEIP Complaint*, Docket No. UE-220376, Order 06 (Feb. 10, 2023).

1 with the Complaint Settlement, the Company filed the Revised CEIP on March 13,
2 2023.²⁵

3 **Q. What are the differences between the Initial and Revised CEIP?**

4 A. The Revised CEIP differs from the Initial CEIP primarily in how the Company
5 incorporated the SCGHG, and the resulting impacts to the Company's interim targets
6 and incremental costs. The differences between the Revised and Initial CEIPs are
7 reflected in Appendix E of the Revised CEIP, while the specific steps that the
8 Company took to incorporate the SCGHG for the Revised CEIP are discussed in
9 PacifiCorp witness Rohini Ghosh's direct testimony, as well as in Appendix F of the
10 Revised CEIP.

11 **Q. What aspects of the Revised CEIP would you like to highlight?**

12 A. We would like to highlight the Company's interim and specific targets, and specific
13 actions.

14 **Q. What do the Company's interim targets represent?**

15 A. The interim targets represent the percentage or volume of the Company's projected
16 retail electric sales that the Company anticipates will be served with renewable or
17 non-emitting energy each year on the path to meet CETA's 2030 and 2045
18 compliance requirements. These CEIP targets are based on then-current assumptions
19 for various inputs, including: load growth, the mix of resources that will be allocated
20 to serve Washington customers, anticipated ability to procure new resources (supply-
21 side and demand-side, as well as transmission resources), claims to the underlying

²⁵ *In re PacifiCorp's 2021 CEIP*, Docket No. UE-210829, Revised 2021 CEIP (Mar. 13, 2023).

1 non-power attributes of the Company's contracted resources, what qualifies as
2 renewable and non-emitting resources; and forecasted market prices, to name a few.

3 **Q. What were the Company's interim targets?**

4 A. The Revised CEIP includes yearly interim targets from 2022 through 2045, and
5 indicate that the Company will be 100 percent GHG neutral by 2030, and achieve 100
6 percent five years early in 2040.²⁶

7 **Q. Do you have anything you would like to highlight regarding the interim targets?**

8 A. Yes. The upward trajectory of the interim targets is driven by the Company's lowest
9 reasonable cost, least-risk analyses which demonstrates a significant need for system-
10 wide renewable and non-emitting additional generation and transmission resources.

11 For example, over the 20-year planning horizon the CEIP portfolio includes
12 13 gigawatts (GWs) of new resources, including: 6,033 megawatts (MWs) of new
13 solar resources that are co-located with storage; 3,564 MWs of new wind resources
14 co-located with storage; 1,500 MWs of advanced nuclear facilities; 1,422 MWs of
15 non-emitting peaking resources, and 500 MWs of new hydroelectric storage.²⁷ The
16 Company anticipates allocating over 1 GW of these resources to serve Washington
17 customers.²⁸ The interim targets also assume that all of the resources from the
18 Company's 2020 all-source RFP are included in the CEIP preferred portfolio.

19 The interim targets are also driven by the Company's assumptions of which
20 thermal resources would serve Washington customers,²⁹ and were based on the

²⁶ *Id.* at 11, Figure 1.1.

²⁷ *Id.* at 16, Table 1.2.

²⁸ *Id.*

²⁹ *Id.* at 19 (including removing Colstrip Unit 4 and Jim Bridger Units 1–4 from Washington rates before 2024; retiring or divesting Colstrip from the Company's portfolio by the end of 2025; removing Hermiston from Washington rates by 2024; and retaining Chehalis to serve Washington customers through 2043).

1 allocation assumptions regarding agreement on a future allocation methodology,³⁰
2 among others.

3 **Q. Do these interim targets anticipate relying on alternative compliance options**
4 **prior to 2045?**

5 A. Yes. The Company anticipates using unbundled renewable energy certificates (RECs)
6 to comply with CETA's greenhouse gas neutrality standard until 2045.³¹ However the
7 Company does not anticipate pursuing additional alternative compliance options, like
8 energy transformation projects.³²

9 **Q. What are the Company's specific targets?**

10 A. The Company proposes a renewable energy specific target of 2,450,430 megawatt
11 hours (MWh) by 2025;³³ an energy efficiency specific target of 212,421 MWh for
12 2022-2025;³⁴ and a demand response specific target of 37.4 MWs by 2025.³⁵

13 **Q. What renewable energy actions would you like to highlight?**

14 A. The bedrock of the Company's supply-side procurement actions for the Revised CEIP
15 are the Company's 2020 and 2022 All Source Request for Proposals (2020AS RFP
16 and 2022AS RFP, respectively). This includes 1,792 MWs of wind generation, 1,211
17 MWs of solar generation paired with storage, 590 MWs of wind generation, and 200

³⁰ *Id.* at 14, n. 16 ("The WIJAM and the 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol (2020 Protocol) define how resources and costs are allocated to Washington customers through December 21, 2023. The Washington Utilities and Transportation Commission approved the WIJAM and 2020 Protocol in its Final Order 09/07/12 in Docket UE-191024 et. al., effective January 1, 2021. The company is in the process of negotiating its Multi-State Process (MSP) cost allocation methodology with the commissions and interested parties in the six states it serves."); *Id.* at 15.

³¹ *Id.* at 15.

³² *Id.*

³³ *Id.* at 20, Table 1.4.

³⁴ *Id.* at 22, Table 1.5.

³⁵ *Id.* at 23.

1 MWs of stand-alone battery resources from the 2020AS RFP final shortlist.³⁶ It also
2 includes 1,345 MWs of new proxy renewable and non-emitting resources, 600 MWs
3 of resources collocated with storage, and 272 MWs of demand-side resources that the
4 Company plans to select from bidders in the 2022AS RFP.³⁷

5 **Q. What specific energy efficiency actions would you like to highlight?**

6 A. The Company has proposed to increase the financial incentives under several
7 programs, broaden the scope of services provided and customers served, and create
8 additional participant tracking and reporting actions.³⁸ Each of these actions were
9 informed by relevant CBIs and input from the Company's EAG, and as noted in the
10 CEIP, are anticipated to deliver 217,408 MWh of savings over the first CEIP
11 implementation period.³⁹ Each will help improve energy efficiency and provide
12 targeted benefits for Washington customers.

13 **Q. What specific demand response actions has the Company proposed?**

14 A. As a direct result of the Company's 2021 demand side RFP and resulting final
15 shortlist of selected resources, PacifiCorp has proposed to procure over 37.4 MWs of
16 demand response resources as a specific action through 2025.⁴⁰ The Company has
17 recently implemented several programs during the implementation period to reduce
18 the Company's peak load. These programs include various services to curtail
19 commercial and industrial load, irrigation load control. Most recently, the Company
20 has filed a prospective residential thermostat and water heater program with the

³⁶ CEIP, at 66, Table 3.2.

³⁷ *Id.* at 67, Table 3.3, and 70.

³⁸ Revised CEIP, at 77–80; *see also In re PacifiCorp's 2021 DR RFP*, Docket No. UE-210088.

³⁹ Revised CEIP at 77, Table 3.5; *but see In re PacifiCorp's 2023 Biennial Conservation Plan*, Docket No. UE-210830, Order 01 (Jan. 18, 2022) (discussing PacifiCorp's ten year achievable conservation potential, biennial conservation target, and applying conditions).

⁴⁰ *Id.* at 76.

1 Commission for approval. Looking ahead the Company is considering forthcoming
2 battery storage, managed charging for electric vehicles, and time-of-use pilots.⁴¹

3 **Q. What specific interested party engagement actions would you like to highlight?**

4 A. As a direct result from feedback from the Company's EAG, the Company proposes
5 several actions to improve the delivery, outreach, and communication regarding its
6 existing and planned programs. Regarding outreach, language, and education, the
7 Company plans to develop more targeted marketing materials to reach historically
8 underserved and highly impacted communities (for example, in schools, grocery
9 stores, and laundromats as opposed to only relying on state-wide or regional
10 marketing channels), and will continue to increase its outreach to Spanish-speaking
11 customers through additional translation of program materials. Regarding
12 electrification, the Company plans to establish an electric vehicle program that
13 provides additional support for named communities to install and purchase electric
14 vehicle charging infrastructure, conduct outreach, and potentially purchase electric
15 vehicles, with approximately \$500,000 to \$750,000 in estimated program costs over
16 the initial implementation period.⁴²

17 **III. OVERVIEW OF CEIP AGREEMENT**

18 **Q. Can you discuss the process that led to the Agreement?**

19 A. Yes. Representatives of all parties to this docket participated in virtual settlement
20 conferences held on July 7 and August 21, 2023, as well as additional discussions by
21 email and phone, and for the purpose of narrowing or resolving the contested issues

⁴¹ *Id.* at 84–85.

⁴² Revised CEIP, at 93; *see also In re PacifiCorp's 2022 Transportation Electrification Plan*, Docket No. UE-220359, Order 01 Acknowledgement Letter (Oct. 27, 2022).

1 in this proceeding. Those discussions led to this Agreement and the CEIP Conditions
2 List.

3 **Q. Can you provide a general overview of the Agreement?**

4 A. Yes. The Agreement is similar to many settlement agreements filed with
5 Commission, and include standard terms and conditions regarding the effect of the
6 Agreement (e.g., that it binds the settling parties if approved by the Commission; that
7 settlement is a compromise; settlement negotiations are not admissible; and that the
8 agreement is not precedential). However, the Agreement is also different from typical
9 settlement agreements, because it includes a list of fifty conditions that are related to
10 various aspects of PacifiCorp's CEIP (CEIP Conditions, Conditions, or
11 Commitments). These conditions are included in Attachment A of the Agreement.

12 **Q. Can you provide a general overview of the CEIP conditions?**

13 A. Yes. The CEIP Conditions include fifty conditions that cover several different
14 categories, ranging from general implementation of the CEIP; improving or
15 enhancing the Company's approach to CBIs and interested party engagement;
16 increasing transparency around the Company's CEIP modeling; clarifying
17 PacifiCorp's approaches to incremental costs and interim targets; and several
18 miscellaneous conditions.

19 Taken together with PacifiCorp's CEIP, the Settling Parties represent that, if
20 approved by the Commission, the Settlement would satisfy both the letter and the
21 spirit of the Commission's CETA and CEIP authorities, and is consistent with lowest
22 reasonable cost, least-risk, and equitable planning principles to meet the needs of

1 PacifiCorp’s Washington customers.⁴³ In the testimony below, each Settling Party
2 provides additional discussion on specific aspects of the Company’s Revised CEIP or
3 Settlement Condition.

4 **IV. INDIVIDUAL SETTLING PARTY POSITIONS**

5 **A. PacifiCorp Statement of Support**

6 **Q. Please state your name, business address, and present position with PacifiCorp
7 d/b/a Pacific Power & Light Company (PacifiCorp or Company).**

8 A. My name is Matthew D. McVee, and my business address is 825 NE Multnomah
9 Street, Suite 2000, Portland, Oregon 97232. I am currently employed as Vice
10 President, Regulatory Policy and Operations.

11 **Q. Please describe your education and professional experience.**

12 A. I have a Bachelor of Science Degree in Biology from Lewis and Clark College and a
13 Juris Doctorate Degree from Lewis and Clark Law School. I have provided legal
14 counsel to various clients in regulatory matters at both state regulatory commissions
15 and the Federal Energy Regulatory Commission (FERC), and acted as administrative
16 attorney to a commissioner at the Nevada Public Utilities Commission. I joined
17 PacifiCorp in 2005 as senior legal counsel for transmission. I became General
18 Counsel for the Western Electricity Coordinating Council in 2008, joined the law
19 firm Troutman Sanders P.C. as a partner in 2010, and rejoined the PacifiCorp legal
20 department in 2013. Before taking my current position in 2021, I was Chief
21 Regulatory Counsel for PacifiCorp. My current responsibilities include managing
22 regulatory relations with the California, Oregon, and Washington state regulatory

⁴³ See, e.g., RCW 19.405.010 through .901; WAC 480-07-740 and -750; WAC 480-100-600 through -660.

1 commissions, staffs, and interested parties; developing regulatory policy strategies for
2 PacifiCorp; and managing PacifiCorp's regulatory discovery and filings group. I have
3 testified on various matters before state utility commissions in Oregon, California,
4 and Washington.

5 **Q. Do you have any specific conditions you would like to address?**

6 A. Yes. I would like to discuss four: Condition 1, regarding general CEIP
7 implementation deadlines; Condition 16, regarding how to improve certain
8 PacifiCorp CBI methodologies; Condition 22, regarding increasing the Commission's
9 modeling expertise; and Condition 30, regarding the Company's Revised CEIP
10 interim targets, and need to update these targets in the 2023 Biennial CEIP Update.

11 **Q. Can you discuss Condition 1, regarding general CEIP implementation**
12 **deadlines?**

13 A. Yes. This condition discusses the relevant deadlines for the Company to implement
14 each CEIP requirement, and generally range from 60 days after a Commission order,
15 to a filing either included within the July 2024 CEIP progress report or a
16 contemporaneous filing as directed by the Commission, to including in the 2025
17 CEIP. Each deadline is based on the importance of the issue, and the resources each
18 would require to implement.

19 For example, in Condition 13 the Company has agreed to create a report card
20 on its website within 60 days of a Commission decision that includes all relevant
21 CBIs, metrics, and baseline data. While the Company will not have information for
22 certain categories (as the Company will begin developing that information or
23 implementing new methodologies for several CBIs for future filings), the Company

1 and interested parties agree that it is important to provide this report card early. This
2 ensures that customers and interested parties have a clearinghouse of information
3 regarding the Company's CBI-related information. Similarly, in Condition 22, the
4 Company agreed to support the Commission's efforts to improve its modeling
5 expertise and capabilities well in advance of the next CEIP and IRP planning cycles
6 (by initiating discussions within 60 days of a final decision).

7 In contrast, other commitments require more time to implement, as some
8 require the Company to adopt, after discussions with our relevant interested parties,
9 new methodological approaches to current practices (for certain CBIs, for example),
10 or create entirely new programs for the Company (for Washington Distribution
11 System Planning efforts, for example). These longer-term requirements will be
12 implemented in due course, either in the July 2024 filing or 2025 CEIP.

13 However, these conditions do not apply beyond the 2025 CEIP. This provides
14 the Company, Commission and interested parties with the appropriate flexibility to
15 respond to then-relevant facts and circumstances in subsequent CEIP planning cycles.
16 In future CEIPs, interested parties would be able to request, and the Commission
17 could order, PacifiCorp to pursue alternative or competing conditions or strategies
18 from what are included in this initial commitment list. This retains the Commission's
19 discretion, and the rights of the parties, to adapt to future circumstances as necessary.

20 **Q. Can you discuss Condition 16, regarding certain PacifiCorp CBI methodologies?**

21 A. Yes. This condition commits the Company to engage with interested parties in several
22 workshops to review and revise our approach to identifying and tracking vulnerable
23 populations. PacifiCorp's approach to identifying vulnerable populations is customer-

1 based and does not have a geographic component. Additionally, our designation of
2 highly impacted communities was modeled after the approach used by the
3 Washington Department of Health and is based on census tract granularity. Because
4 of these differences, the commitments from similar Washington utilities on
5 vulnerable populations are not reasonably tailored to PacifiCorp's approach.
6 However, we are committed to improve our ability to target our interventions and
7 achieve desired outcomes for historically disadvantaged groups in our service area
8 and will incorporate these learnings in our 2025 CEIP. We would anticipate
9 addressing several issues, among others, to improve our processes:

- 10 • Should PacifiCorp continue with a census tract approach, or a block group
11 approach, given that our approach to defining vulnerable populations is customer-
12 based, and not geographic?
- 13 • How should PacifiCorp evaluate vulnerability factors?
- 14 • What data is available to estimate the population of subgroups not included in the
15 ACS, such as cardiovascular disease, low birth weights, higher rates of
16 hospitalization, home care, housing burden, access to digital/internet resources,
17 access to food, access to healthcare, historical redline influence, linguistic
18 isolation, transportation expense, housing quality, Low-income Housing Tax
19 Credit qualification, community in economic distress qualification? Are there
20 expectations for update frequency, precision, or other data characteristics?
- 21 • How can the Company improve on its differentiation and tracking?

1 **Q. Can you discuss Condition 22, regarding increasing the Commission’s modeling**
2 **expertise?**

3 A. Yes. The Company agreed to several provisions to assist the Commission improve
4 and enhance its modeling capabilities. For example, the Company agrees to fund the
5 Commission’s purchase of four full or partial licenses from Energy Exemplar for
6 Commission Staff to use Energy Exemplar’s PLEXOS Model. This includes
7 additional funding to support reasonable development, training, and support
8 (provided by Energy Exemplar), to train Commission Staff how to use and operate
9 the software. The Company will also use reasonable efforts to support the
10 Commission’s contract negotiations with Energy Exemplar, and will provide support
11 to Commission Staff on the Company’s future CEIPs and CEIP modeling (not to
12 exceed four hours each month).

13 This is an important commitment that ensures that, for future CEIPs, not only
14 will the Commission have the training and expertise to effectively evaluate the
15 Company’s filings, but it will help focus Commission and stakeholder resources on
16 relevant and important issues that will inevitably result as the Company continues to
17 implement CETA’s ambitious requirements. Resource procurement planning is one of
18 the more complex and technocratic functions that utilities perform; this commitment
19 ensures that the Washington Commission has the resources it needs to review our
20 efforts.

21 **Q. Can you discuss Condition 30, regarding the Company’s interim targets, and**
22 **need to update these targets in the 2023 Biennial CEIP Update?**

23 A. Yes. As discussed in previous Company filings, PacifiCorp has requested the

1 Commission permit the Company to update its CEIP to reflect current assumptions
2 and operational realities that impact the interim targets.

3 **Q. Do you believe that the Company’s assumptions when it filed the Initial CEIP**
4 **were reasonable and merit approval?**

5 A. Yes. At the time the CEIP was developed, PacifiCorp could not predict the current
6 energy market conditions, the continuing supply chain issues affecting developers,
7 and had not anticipated that a new allocation methodology would include fixed
8 allocations with larger shares of resources going to serve Washington customers. As
9 noted in the Company’s petition for clarification and review, several of those
10 assumptions are no longer reasonable, nor reflect current operational realities.⁴⁴

11 **Q. How does the Company recommend the Commission consider this information?**

12 A. Because Washington law requires utility CEIPs to include, and the Commission to
13 approve, interim and specific targets, PacifiCorp recommends the Commission
14 approve the Company’s Revised CEIP (including the annual interim targets and four-
15 year interim target) that was based on then-reasonable assumptions and permit the
16 Company to update these assumptions as necessary in the 2023 Biennial CEIP
17 Update.

18 **Q. Overall, does PacifiCorp believe that the settlement is in the public interest?**

19 A. Yes. The Agreement is in the public interest and should be approved for the following
20 reasons:

- 21 • The Agreement satisfies the letter and the spirit of the Commission’s CETA
22 statutes, regulations, and relevant Commission orders.

⁴⁴ *In re PacifiCorp’s 2021 CEIP*, Docket No. UE-210829, Motion for Clarification or Review, ¶¶ 14-20 (May 30, 2023) (discussing several examples why an update was needed).

- 1 • The Agreement and CEIP commitments result in a CEIP and CEIP processes that
2 generally aligns with the CEIPs of Avista and Puget Sound Energy, and also
3 respects the important and material differences presented by PacifiCorp and its
4 six-state service territory.
- 5 • The Agreement, if adopted by the Commission, allows the Commission,
6 Company, and interested parties to re-direct resources to focus on implementation
7 and progress towards complying with CETA, as opposed to further process on a
8 CEIP that was initially filed in late 2021.

9 **Q. Does that conclude PacifiCorp’s statement?**

10 A. Yes.

11 **B. Staff Statement**

12 **Q. Please state your name and business address.**

13 A. My name is Molly Brewer, and my business address is 621 Woodland Square Loop
14 SE, Lacey, Washington, 98503.

15 **Q. By whom are you employed and in what capacity?**

16 A. I am employed by the Commission as a Regulatory Analyst in the Energy Regulation
17 Section of the Regulatory Services Division.

18 **Q. Would you please state your educational and professional background?**

19 A. I graduated from Western Washington University in 2014 with a B.A. in Community
20 Development and Multicultural Studies. In 2020, I graduated from the University of
21 Washington Evans School of Public Policy with an M.A. in Environmental Policy. In
22 Spring 2022, I completed a Graduate Certificate in Public Utility Regulation &
23 Economics from New Mexico State University. I also completed a National

1 Association of Regulatory Utility Commissioners course, “Including Equity and
2 Energy and Environmental Justice in State Public Utility Commission Decisions” in
3 July 2022. Additionally, I have worked for Seattle Public Utilities where I led a Race
4 and Social Justice Initiative work group to create an equity strategy for environmental
5 ordinances.

6 **Q. Does Staff recommend the Commission approve the Revised CEIP subject to the**
7 **settlement conditions?**

8 A. Yes, Staff supports the Company’s revised CEIP subject to the conditions in this
9 settlement.

10 **Q. Does Staff believe that the settlement is in the public interest?**

11 A. Yes. The settlement sets a reasonable timeline for the Company to make
12 improvements and incorporate those improvements into the next CEIP. Those
13 improvements address issues such as transparency, equity, the incremental cost
14 calculation, and future modeling and analysis. The settlement is in the public interest
15 because—if approved—it allows the Company to begin making these agreed upon
16 changes sooner than if this case were fully litigated.

17 **Q. Does Staff support the Company’s approach to include the Revised CEIP**
18 **interim targets in this settlement?**

19 A. Yes. Staff believes it is reasonable for the Company to include the Revised CEIP
20 interim targets based on then-reasonable assumptions and permit the Company to
21 update these assumptions as necessary in the 2023 Biennial CEIP Update.

22 **Q. Does Staff have any commentary on Transparency Conditions 17-24?**

23 A. Yes. These conditions all relate to data transparency and ensure that the Company

1 submits a CEIP filing that includes data files and workpapers that are transparent,
2 useful and accessible to parties. Staff found that each of these conditions were
3 necessary to ensure that Staff and other parties do not spend unnecessary time
4 deciphering data files, as these conditions provide simple solutions to make the review
5 process more efficient. Staff also supports the approach the Company has agreed to in
6 Condition 22 to reasonably aid Staff with modeling, as Staff needs to be able to review
7 and run models the Company provides.

8 **Q. Does Staff have any commentary on the CBI conditions?**

9 A. Yes. These conditions aim to refine how the Company measures aspects of CBIs and
10 reports on them in the CEIP. These conditions are necessary because the equity
11 components of CETA are closely tied to and as important as the clean energy
12 components. As reflected in these conditions, Staff believes that the Company must
13 go farther in its efforts to measure impacts for Named Communities, and to continue
14 to refine how it identifies and measures Vulnerable Populations.

15 In particular, Condition 15 aims to initiate a process wherein the Company
16 learns how to measure impacts for subsets of Named Communities. In other words,
17 particular groups of highly impacted communities and/or vulnerable populations can
18 have different needs and are impacted in different ways. Though we group them
19 together as “Named Communities” for efficiency in language, Staff emphasizes that
20 the Company will need to start disaggregating specific communities when it uses
21 CBIs.

1 **Q. Does Staff have any commentary on Distribution System Planning Condition**
2 **25?**

3 A. Yes. Condition 25 states that the Company will begin distribution system planning
4 (DSP) in Washington, using learnings from its Oregon DSP process. Staff believes
5 this is a necessary step to work towards distributed energy resource (DER) planning,
6 as companies are likely going to need to more closely evaluate the need for DERs to
7 meet clean energy targets in the years to come. Further, DERs are likely to become an
8 important part of achieving CETA's distributional equity components. Staff supports
9 the Company engaging in DSP planning in this way.

10 **Q. Does that conclude Staff's statement?**

11 A. Yes.

12 **C. NWEC Statement**

13 **Q. Please state your name and business address.**

14 A. My name is Lauren McCloy and my business address is 811 1st Ave, Suite 305,
15 Seattle, WA 98104.

16 **Q. By whom are you employed and in what capacity?**

17 A. I am the Policy Director for NWEC.

18 **Q. Please state your educational and professional background.**

19 A. As Policy Director for NWEC, I support and guide the Coalition's policy work in
20 Washington, as well as Oregon, Idaho, and Montana, and also our work on regional
21 and federal issues, including regional planning, markets, and federal infrastructure
22 funding.

23 Previously, I worked as Senior Policy Advisor to Governor Jay Inslee,
24 where I led and managed a broad range of issues in support of the Governor's

1 energy priorities, including the Clean Energy Transformation Act, Climate
2 Commitment Act, Environmental Justice issues, and elements of the state’s
3 response to the COVID-19 pandemic.

4 Prior to serving in that role, I was the Legislative Director for the
5 Washington Utilities and Transportation Commission (“UTC”, “WUTC”, or
6 “Commission”), where I served as the Commission’s liaison to the state
7 Legislature and the Governor’s office, coordinated the UTC’s legislative activities,
8 and advised Commissioners on energy policy and legislative issues. Before joining
9 the UTC’s policy staff, I worked as a Compliance Investigator in the UTC’s
10 Consumer Protection Division.

11 I completed Utility Regulation 101 training with the National Regulatory
12 Research Institute in 2015 and Rate Spread and Rate Design training with EUCI in
13 2016. I have a B.A. from the University of North Carolina at Chapel Hill and an M.S.
14 in International Development from Tulane University Law School. My background
15 and first-hand experience are the basis for my expertise and qualifications to testify as
16 an expert on the issues raised in my testimony.

17 **Q. Please summarize your testimony.**

18 A. NWEC supports the Company’s revised CEIP subject to the conditions in this
19 settlement. My testimony focuses on improvements to the CEIP that ensure that
20 actions are taken to make progress toward achieving the Company’s interim and
21 specific targets within the remainder of the 2021 CEIP implementation period and
22 that the efforts taken to achieve these targets advance energy equity and distribute
23 benefits to Named Communities. I conclude in support of the Company’s approach to

1 include the Revised CEIP interim targets in this settlement, and with the assertion that
2 this Settlement Agreement is in the public interest.

3 **Q. Please summarize the Settlement terms that ensure that action will be taken to**
4 **make progress towards the Company's interim and specific targets laid out in**
5 **the 2021 CEIP.**

6 A. NWEC supports two key provisions which will ensure that the Company will make
7 progress towards achieving its interim and specific targets. First, Condition #25
8 requires the Company to conduct distribution system planning (DSP) for its
9 Washington service territory, incorporating relevant learnings from its DSP efforts in
10 Oregon, and evaluating Washington-specific costs and benefits. This process will
11 provide an opportunity for stakeholder input regarding strategies for meeting targets
12 in ways that support optimal utilization of PacifiCorp's distribution system, including
13 the use of customer-side resources like distributed generation, distributed storage,
14 flexible demand, and other resources that are not owned or controlled by PacifiCorp.
15 Second, Condition #40 requires the Company to provide a sensitivity analysis that
16 removes the Natrium demonstration project from the preferred portfolio in 2028, and
17 identifies resource alternatives and system impacts. This condition will ensure that the
18 Company evaluates the potential for other clean resources, like offshore wind,
19 demand response, enhanced geothermal, long-duration storage, and high-capacity
20 factor solar plus storage (among other resources) to meet system reliability needs.

21 **Q. Please explain NWEC's support for Distribution System Planning.**

22 A. NWEC supports advancing Distribution System Planning in Washington to help
23 utilities and their customers plan for investments that will help optimize supply- and

1 demand-side resources. Ensuring that utilities are leveraging the full suite of
2 customer-side resources to optimize the use of their distribution system, and making
3 investments that support the two-way flow of information and energy from customers
4 will support the efficient prioritization of distribution system investments, manage
5 energy demand, as well as advance energy efficiency and equity goals.

6 **Q. Please explain NWEC's support for conducting a sensitivity that removes the**
7 **Natrium plant from the Company's preferred portfolio.**

8 A. NWEC does not believe that the Company has demonstrated that the Natrium plant is
9 part of a lowest reasonable cost portfolio for meeting system and reliability needs. We
10 also are skeptical that the plant will be built on time and at reasonable costs.

11 Therefore, we support the further evaluation of alternative resources to replace the
12 anticipated services from the Natrium plant, consistent with the resource prioritization
13 outlined in CETA: energy efficiency, demand response, renewable energy and energy
14 storage (RCW 19.405.040(6)(a)).

15 **Q. Please summarize the Settlement terms that commit the Company's actions to**
16 **advancing energy equity and distributing benefits to Named Communities.**

17 A. The Settlement includes several elements that commit the Company to advancing
18 energy equity and distributing benefits to Named Communities, including:

- 19 • The addition and revision of CBIs and the creation of a publicly-accessible and
20 comprehensive CBI report card.
- 21 • Commitment to further review and potentially expand on the identification of
22 Vulnerable Populations.

- 1 • Commitment to collaborate with its Equity Advisory Group (EAG) and Low-
2 Income Advisory Committee (LIAC) to identify at least one specific action that
3 will serve a designated subset of Named Communities, and to identify and track
4 all CBIs relevant to this specific action.

5 **Q. Please explain NWECC’s support for adding and revising CBIs, and creating a**
6 **CBI report card.**

7 A. NWECC strongly supports the revision and addition of CBIs and metrics that expand
8 tracking within Named Communities and that align the Company’s CBIs and metrics
9 with those of peer utilities. The revisions to the Company’s CBIs that improve
10 tracking and reporting of disconnections, arrearages, and energy burden are at a level
11 of granularity and frequency that support continuation of the necessary efforts that the
12 Commission, interested parties, and utilities have pursued to identify highly-impacted
13 and vulnerable households as well as the needs of these households. Furthermore, the
14 addition of a CBI that tracks distributed energy resources and savings from energy
15 efficiency programs within Named Communities will highlight progress towards
16 directing project benefits to these communities. Additionally, the creation of a
17 publicly-accessible comprehensive report card of CBIs and metrics will enable the
18 public and other interested parties to more easily determine how the Company’s
19 efforts are impacting its customers.

20 **Q. Please explain NWECC’s support of the Company’s commitment to further**
21 **review and potentially expand on the identification of Vulnerable Populations.**

22 A. NWECC supports the Company’s willingness to broaden the scope of its analysis to

1 identify Vulnerable Populations with a methodology that results from collaboration
2 between interested parties and the Company. We are particularly supportive of the
3 requirement to consider the list of vulnerability factors outlined in the Settlement as
4 these factors have been supported and approved by the Commission for Puget Sound
5 Energy's 2021 CEIP. NWECC looks forward to working with the Company and other
6 interested parties to finalize a method to identify and track the Company's Vulnerable
7 Populations.

8 **Q. Please explain NWECC's support of the Company's commitment to collaborate**
9 **with its EAG and LIAC to identify at least one specific action that will serve a**
10 **designated subset of Named Communities, and to identify and track all CBIs**
11 **relevant to this specific action.**

12 A. In order for Named Communities to benefit from the Company's specific actions,
13 NWECC believes that it is necessary to directly implement specific actions within
14 Named Communities themselves. NWECC supports the Company's commitment to
15 identify at least one specific action that is intended to directly benefit a subset of
16 Named Communities through collaboration with its EAG and LIAC as these groups
17 have experience living in, working with, and/or representing Named Communities.
18 Implementing specific actions within these communities not only directly benefits the
19 subset selected, but also provides an opportunity for the Company to learn how to
20 provide more direct service and benefits to similar communities in the future. A part
21 of this learning process will spawn from tracking the customer benefits accrued from
22 the specific action(s) selected.

1 **Q. Does NWEC support the Company's approach to include the Revised CEIP**
2 **interim targets in this settlement?**

3 A. Yes. NWEC supports the Company's approach to include the Revised CEIP interim
4 targets in this Settlement based on then-reasonable assumptions. The Company
5 retains the option to update these assumptions as necessary in the 2023 Biennial CEIP
6 Update.

7 **Q. Does NWEC believe that the settlement is in the public interest?**

8 A. Yes. NWEC believes that the settlement is in the public interest because it allows the
9 Company to make progress during the limited time remaining in this 2021 CEIP
10 cycle. Given the significant delay in Pacific Power's 2021 CEIP implementation, the
11 public interest weighs strongly in favor of Commission approval of the settlement.
12 The settlement also provides important direction to the Company which will improve
13 future CEIP filings.

14 **Q. Does that conclude NWEC's statement?**

15 A. Yes.

16 **D. Sierra Club Statement**

17 **Q. Please state your name and business address.**

18 A. My name is Lindsay Beebe, and my business address is 824 South 400 West, Suite
19 B103, Salt Lake City, UT 84101.

20 **Q. Where are you employed and what is your position?**

21 A. I am employed by Sierra Club. In my current role, I am a State Lobbying and
22 Advocacy Representative within Sierra Club's State Lobby Program. Previous to this
23 role, I was a Campaign Representative with Sierra Club's Beyond Coal Campaign,

1 where I focused on energy issues throughout the intermountain and coastal West. As
2 part of this work, I developed deep familiarity with PacifiCorp’s generating system
3 and Commission oversight of PacifiCorp’s activities.

4 **Q. Would you please briefly state your educational and professional background?**

5 A. Yes. I graduated from The University of Vermont in 2010 with a B.S. in Community
6 & International Development. Since 2012 I have worked in the community advocacy
7 sector, organizing communities to access and meaningfully engage in utility planning
8 and decision-making processes. I have served as the Community Engagement
9 Coordinator for HEAL Utah, and an Organizing Representative and Senior Campaign
10 Representative for the Sierra Club’s Beyond Coal Campaign. My work with Sierra
11 Club and with HEAL Utah focused almost exclusively on PacifiCorp, and their
12 subsidiaries, Rocky Mountain Power and Pacific Power. For more than a decade I
13 have been a party to PacifiCorp’s administrative rulemakings at the EPA, state
14 departments of environmental quality, and state utility commissions.

15 **Q. Does Sierra Club recommend that the Commission adopt the proposed settlement**
16 **agreement?**

17 A. Yes, Sierra Club supports adoption of the proposed settlement agreement, which
18 would result in the Commission approving PacifiCorp’s Revised CEIP, subject to
19 conditions within the settlement.

20 **Q. Does Sierra Club believe that the settlement is in the public interest?**

21 A. Yes. The settlement will help to further CETA’s energy and equity goals in a number
22 of ways. For instance, Sierra Club is supportive of the Community Benefit Indicator
23 (“CBI”) conditions, which will require PacifiCorp to collect critical data on “Known

1 Low-Income” customers, Vulnerable Populations, and Highly Impacted Communities
2 as well as set goals, objectives, and/or directionality for each CBI. Additionally, the
3 settlement agreement includes a number of transparency conditions that will improve
4 Commission staff and interested parties’ access to information and understanding of
5 PacifiCorp’s resource decisions. Importantly, PacifiCorp has agreed to provide a draft
6 CEIP, which will allow for comments from advisory group interested parties to be
7 considered prior to finalization.

8 **Q. Do you have any other comments on any particular settlement conditions?**

9 A. Yes, I do. In addition to the above conditions (as well as other settlement conditions
10 not discussed), the proposed settlement will require PacifiCorp to prepare in the 2025
11 CEIP a sensitivity PLEXOS model run that excludes non-commercialized resources
12 from the candidate resource list and relies on clean resources, such as offshore wind,
13 demand response, enhanced geothermal, iron-air batteries or similar long duration
14 storage, and high-capacity factor solar plus storage (among other resources) to meet
15 identified reliability gaps. This condition is particularly important to Sierra Club. In
16 recent years, PacifiCorp’s integrated resource plans have relied upon non-
17 commercialized resources such as advanced nuclear reactors and generic “non-
18 emitting peakers” to meet projected reliability shortfalls that PacifiCorp does not
19 believe could be met with wind, solar, and certain battery technologies. However, it is
20 not clear that PacifiCorp has considered other reliability resources, such those listed
21 above, with the same level of attention as has been provided to nuclear and “non-
22 emitting peakers.”

23 Transitioning to a clean energy future will likely require the development of

1 new and not-currently commercialized resources. Sierra Club is not opposed to
2 evaluating the costs and benefits of developing resources. However, it will also be
3 important to leverage clean resources that are currently commercialized (on a global
4 scale). The required PLEXOS model run would ensure that PacifiCorp is evaluating
5 the costs and benefits of clean resources, like offshore wind, at the same time that it
6 evaluates the costs and benefits of speculative resources, such as advanced nuclear
7 reactors.

8 **Q. Does this conclude your statement?**

9 A. Yes, it does.

10 **E. The Energy Project Statement**

11 **Q. Ms. Stokes, could you please summarize the purpose of your testimony?**

12 A. The purpose of my testimony is to provide support for approval of the Agreement.
13 My testimony focuses on the elements of the Agreement that impact low-income
14 customers within Pacific Corp's service territory and explains why TEP believes the
15 Agreement is in the public interest.

16 **Q. Please provide a summary of the elements of the Agreement that are particularly**
17 **beneficial to low-income customers.**

18 A. The Agreement includes several components that specifically address low-income
19 customer issues. These include:

- 20 • Improved tracking and reporting of customer disconnections on a quarterly basis.
- 21 • New tracking of arrearages for vulnerable populations on a quarterly basis.
- 22 • Convening a workshop to establish additional criteria for tracking vulnerable
23 populations.

1 • New tracking of energy efficiency benefits conferred on low-income populations.

2 **Q. Please explain TEP's support for implementing tracking of disconnections and**
3 **arrearsages.**

4 A. TEP is particularly supportive of requirements in the settlement agreement that
5 improve tracking and reporting of disconnections and arrearsages by identifying not
6 only the number of customers are being disconnected or are behind in payments, but
7 also identifying factors that may contribute to disconnections and arrearsages. These
8 factors will initially include the number and percentage of residential electric
9 arrearsages and disconnections for nonpayment by month, measured by location and
10 demographic information (zip code/census tract, KLI customers, Vulnerable
11 Populations, and Highly Impacted Communities). The tracking of arrearsages is
12 particularly important because IOU filings have demonstrated that customers with
13 arrearsages 90 or more days past due are most at risk of disconnection. The more
14 detailed and frequent tracking and reporting called for by the settlement will enable
15 PacifiCorp and interested parties to identify vulnerable communities and their risk for
16 disconnection.

17 **Q. Please explain TEP's support for the workshop process to identify parameters**
18 **for tracking vulnerable communities.**

19 A. The workshop process will give interested parties a role in determining how PAC can
20 better track its vulnerable populations. Factors to be considered for inclusion in
21 PacifiCorp's tracking include health factors such as cardiovascular disease or low
22 birth weights, energy insecurity reflected by arrearsages/disconnections and energy
23 burden, and other socioeconomic factors, such as access to digital/internet resources,

1 food, and health care, educational attainment level, historical redline influence,
2 linguistic isolation, race, transportation expense, unemployment, poverty, deep
3 poverty, renter status, seniors with fixed income, housing quality. Reaching
4 consensus on the factors that will shape tracking and implementing this tracking and
5 reporting will enhance the ability to understand how health and socioeconomic
6 factors contribute to energy insecurity and will help focus programs that address
7 energy insecurity on those communities most at risk. These factors will also ensure
8 that PacifiCorp's CEIP aligns with requirements that apply to Puget Sound Energy
9 and Avista Corp.

10 **Q. Please explain TEP's support for tracking of energy efficiency programs and**
11 **clean energy.**

12 A. TEP's comments on PacifiCorp's initial CEIP focused on its failure to include any
13 tracking and reporting on the extent to which vulnerable populations receive the
14 benefits of energy efficient and clean energy initiatives. The settlement remedies this
15 omission with detailed requirements for PacifiCorp to track both the number and
16 percentage of residential appliance rebates provided to Named Communities and
17 rental units and rental stock. In addition, PacificCorp will consult with its EAG,
18 LIAC, and DSMAG to determine and implement strategies to increase access to
19 energy efficiency programs. Thus, the settlement will improve tracking and
20 implementation of energy efficiency programs.

21 The settlement also provides for tracking and reporting of clean energy in
22 low-income neighborhoods. Specific metrics in the settlement include tracking of
23 energy storage resources 5 MW and under and total MWh of energy savings from

1 energy efficiency programs where benefits and control of the savings accrue to
2 members of named communities. PacificCorp has also agreed to specify whether the
3 named community resources are HIC and/or VP and/or known LI. For vulnerable
4 populations, where known, PacificCorp will specify named community resources
5 broken down by the sensitivity factors and/or socioeconomic factors that led the
6 customer or community to be designated vulnerable. This information will allow
7 PacificCorp, the Commission, and interested parties to ensure that such programs
8 benefit low-income communities and vulnerable populations.

9 **Q. Does TEP support approval of the Agreement?**

10 A. Yes. TEP believes the Agreement is in the public interest and recommends that it be
11 approved by the Commission. TEP fully supports the Agreement filed with the
12 Commission and appreciates PacificCorp's and the other parties' work to reach this
13 agreement.

14 **Q. Does this conclude your statement?**

15 A. Yes.

16 V. CONCLUSION

17 **Q. Does this conclude the Joint Settlement testimony?**

18 A. Yes.