

PSE DATA REQUEST NO. 004 to NVEC and FAC: ENERGY BURDEN

(Re: Prefiled Response Testimony of Roger Colton, Exh. RDC-1T, page 18, lines 19-20)

- a. How does Mr. Colton determine to weight energy burden more heavily?
- b. What is his methodology?
- c. Was any customer engagement or research done to define?

Response:

(a) – (c)

Mr. Colton did not introduce the notion that “energy burdens” may be a “leading indicator” of “vulnerability.” Nor did Mr. Colton introduce the notion that there may be more than one “lead indicators” of “vulnerability.” Instead, on a page of his testimony not cited in PSE’s question, Mr. Colton quoted PSE, itself, as reporting that “energy burden. . . may be a helpful lead indicator to engage multiple dimensions of vulnerability in PSE’s Service Area.” CEIP, at 55. The fact that PSE, itself, referenced energy burden as “a” lead indicator (rather than as “the” lead indicator) suggests that PSE contemplates that there may be more than one lead indicator.

Accordingly, Mr. Colton did not present a specific “methodology” by which PSE can “weight [*sic*] energy burdens more heavily” as suggested by the question. Mr. Colton’s Direct Testimony instead simply agreed with PSE that there may be “leading indicators” (a phrase used by PSE in the CEIP) of “vulnerability” (also a term used by PSE in the CEIP) “*like* energy burdens” (Exh. RDC-1R, page 18, lines 19 – 20) (emphasis added) (agreeing with PSE that energy burden is one, but not the exclusive, “lead indicator”) and that the weight accorded to these vulnerability factors should reflect their status as “lead indicators.” PSE did not identify which other factors would also be considered a “lead indicator.” In fact, Mr. Colton’s testimony acknowledges that PSE currently lacks the data to engage in such weighting. His recommendation is “The WUTC should also direct PSE to immediately *begin gathering data necessary to implement* this revised method for designating Vulnerable Populations.” (Exh. RDC-1R, page 18, lines 22 – 23) (emphasis added). The fact that the data gathering is “*necessary to implement*” the “revised method for designating Vulnerable Populations” indicates that there is not yet sufficient data available to implement the revised method.

No “customer engagement” was “done” to define the recommendation of Mr. Colton. His recommendation is based on the totality of his experience, and the analysis reflected in his Direct Testimony. Neither Front and Centered nor the NW Energy Coalition have access to PSE customer lists that would allow systematic engagement with individual PSE customers.

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NVEC and FAC Responses to PSE Data Requests Nos. 001-005

Date of Response: November 22, 2022

Person who prepared the Response: Roger Colton

Witness knowledgeable about the Response: Roger Colton