

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**PACIFIC POWER & LIGHT
COMPANY,**

Respondent.

DOCKET UE-152253

CROSS ANSWERING TESTIMONY OF

Shawn M. Collins

**ON BEHALF OF
THE ENERGY PROJECT**

April 7, 2016

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Q. Please state your name and business address.

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

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

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

Q. How long have you been employed by Opportunity Council.

A. I have been employed by Opportunity Council since 2006.

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

A. I have a BA from Eastern Illinois University and have been working on issues impacting low-income populations since 2002 through Community Action Partnership organizations and a variety of other nongovernmental entities. I have been employed with TEP for one year, and have been the Director since August of 2015. I have previously provided testimony on behalf of TEP in Dockets UE-150204/UG-150205.

Prior to my involvement with TEP, I was the Associate Director of a division at Opportunity Council responsible for the implementation of a number of weatherization programs benefitting low and moderate income households throughout northwest Washington State. Through my involvement with the energy efficiency/regulatory sector, I have attended and presented at numerous

1 national conferences, participated in sector specific workshops and trainings, and
2 was a board member for Home Performance Washington from 2013-2015.

3 **Q. On whose behalf are you testifying?**

4 A. I am testifying for TEP, an intervener in this proceeding on behalf of the
5 Community Action Partnership (CAP) organizations that provide low-income
6 energy efficiency and bill payment assistance for customers in Pacific Power &
7 Light's (PPL) Washington State service territory. These agencies include
8 Opportunities Industrialization Center of Washington, Blue Mountain Action
9 Council, and Northwest Community Action Center.

10 **II. SCOPE AND SUMMARY OF TESTIMONY**

11 **Q. What is the scope of your testimony?**

12 A. My cross answering testimony is primarily concerned with issues raised
13 and positions taken within this rate case that impact low-income populations
14 within PPL's service territory. Specifically, I will address the Low-Income Bill
15 Assistance (LIBA) program, the Low-Income Weatherization Program, and the
16 possibility of a third residential rate block.

17 **III. SUBSTANTIVE DISCUSSION OF ISSUES**

18 **Q. What is your response to the testimony of Jason Ball on behalf of UTC Staff**
19 **pertaining to low-income funding of low-income bill assistance and low-**
20 **income weatherization?**

21 A. As outlined in the testimony of Mr. Ball¹, Staff recommends increasing funding to
22 PPL's low-income energy assistance program (i.e. LIBA) and the conservation

¹ Docket UE-152253, Exhibit No. JLB-1T, Pgs. 47-48

1 program (i.e. low-income weatherization). TEP agrees with this recommendation,
2 and agrees that the current level of funding is substantially less than the amount of
3 funds contributed to conservation programs from utilities such as Avista.

4 Furthermore, TEP agrees with the Staff in their assertion that PPL has not
5 presented a study in the current proceeding analyzing the impact of a two-year
6 rate plan and decoupling mechanism and that without such an analysis, there is no
7 way to predict the impact of several different regulatory mechanisms on low-
8 income households in PPL's territory.

9 **Q. What is your response to the testimony of Tiffany Van Meter on behalf of**
10 **UTC Staff pertaining to the implementation of a third block to the residential**
11 **rate structure?**

12 **A.** As stated in Ms. Van Meter's testimony², neither Staff nor PPL completed
13 an analysis of the potential impact of a third block on residential rates. TEP is
14 extremely concerned that the implementation of a third block on residential rates
15 has the potential to have a devastating impact on low-income households that live
16 in energy inefficient residential structures, which is common for low-income
17 households, and therefore require them to utilize more energy consumption than
18 the average PPL residential customers. According to the U.S. Department of
19 Energy's Residential Energy Consumption Survey, manufactured homes built
20 before 1980 consume an average of 84,316 BTUs per square foot, 53 percent
21 more than all other types of homes. As many low-income weatherization program
22 data show, a significant number of low-income households reside in

² Docket UE-152253, Exhibit No. TMV-1T, page 11

1 manufactured homes. Without a study to attain the number of low-income
2 households in PPL's territory and the energy burden of these households, there is
3 no way to evaluate the impact of a third rate block to these households.

4 TEP strongly recommends that funding and a timeline be established for a
5 study that would address the Commission's stated expectation for, "the Company
6 and others to continue developing data and undertaking analyses of low-income
7 customer usage patterns in Pacific Power's service territory. These can inform
8 thoughtful consideration in testimony in the Company's next general rate case
9 concerning the price signals a third block rate design will likely have on such
10 customers."³

11 TEP believes that this study would be of considerable assistance to the
12 Commission in making decisions pertaining to programs such as LIBA, Low-
13 Income Weatherization, decoupling, rate design, and numerous other issues or areas
14 of interest. The Company possesses the customer data necessary for any useful
15 study to be performed, and therefore their participation is vital. TEP humbly urges
16 the Commission to provide the specificity needed to all interested parties to guide
17 them in the creation of a study focusing on low-income customer population
18 numbers and consumption characteristics.

19 **Q Would you make any modifications to the approach for addressing the ending**
20 **of the five-year plan outlined in the testimony of Tiffany Van Meter?**

21 **A.** Yes, TEP suggests that the stakeholder group be tasked with not only
22 addressing the LIBA Program, but also PPL's Low-Income Weatherization

³ UE-140762, Order 8 pp. 93, ¶ 219

1 Program. TEP also recommends that a deadline of January 31, 2017 be adopted for
2 the submission to the UTC Commission of a completed comprehensive funding and
3 program modification recommendation report for both LIBA and Low-Income
4 Weatherization Program. We also recommend a professional facilitator be hired for
5 the stakeholder collaborative.

6 **Q. What is your response to the testimony of Ralph Cavanagh on behalf of the**
7 **NW Energy Coalition pertaining to low-income funding?**

8 **A.** TEP agrees with Mr. Cavanagh's recommendation to increase LIBA
9 funding proportionate to any residential bill increases resulting from the
10 decoupling mechanism, as well as his proposal to convene a stakeholder group to
11 discuss LIBA program changes in conjunction with the end of the current five-
12 year plan.

13 **Q. Would you make any modifications to the approach for addressing the**
14 **decoupling mechanism as outlined in the testimony of Mr. Cavanagh?**

15 **A.** Yes, it is the view of TEP that the impacts of decoupling are often unclear
16 until after the fact. TEP understands that decoupling is intended to protect
17 customers and increase conservation efforts, however we also stress that an
18 examination of the impact to low-income households and a plan to offset the
19 negative impacts to these households must be part of the decoupling plan.

20 **V. CONCLUSION**

21 **Q. Does this conclude your testimony?**

22 **A.** Yes.
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