

**EXH. WTE-__X
DOCKET UE-210795
2022 PSE CEIP
WITNESS: WILLIAM T. EINSTEIN**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

Docket UE-210795

**EXHIBIT TO THE CROSS-EXAMINATION OF
WILLIAM T. EINSTEIN
ON BEHALF OF NW ENERGY COALITION AND FRONT AND CENTERED**

JANUARY 24, 2023

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. 189:

Topic: Einstein Testimony (Community Engagement, DER Solar Products, Minimum Designations)

Witness Einstein testifies that “the community and customer engagement approach outlined in this testimony meets the intent of the request from some of the parties for a Distributed Energy Resource Public Engagement Pilot.” WTE-1T at 19:9–19:12. Witness Einstein also testifies that PSE’s public engagement process “is most reflective of the ‘Involve’ step in the [IAP2] spectrum. However, there are some actions that are reflective of the ‘Collaborate’ step in the spectrum.” WTE-1T at 15:2–15:6.

- a. Please explain how a public process that aligns with the “Involve” and “Collaborate” steps in the IAP2 spectrum “meets the intent” of a Distributed Energy Resource Public Engagement Pilot that aligns with the “Empowerment” step in the IAP2 spectrum.

Response:

As noted in the Prefiled Rebuttal Testimony of William T. Einstein, Exh. WTE-1T at page 15, line 2, the IAP2 Public Participation Spectrum was not applied to the community and customer engagement process.

At page 12, lines 19-20 and page 13, lines 1-6 of his rebuttal testimony, Exh. WTE-1T, Mr. Einstein noted that “PSE will structure its community engagement to seek input from a diverse set of customers to understand (i) what types of products or programs that highly impacted communities and vulnerable population customers would find most beneficial, (ii) what barriers exist for highly impacted communities and vulnerable population customers in accessing these products or programs, and (iii) how PSE can best design solutions to alleviate and overcome those barriers and maximize the benefits that highly impacted communities and vulnerable population customers value most.” Additionally, Puget Sound Energy (“PSE”) developed its community and customer engagement approach prior to the introduction by some of the parties in this proceeding of a Distributed Energy Resource Public Engagement Pilot.

PSE’s understanding of the IAP2 spectrum is that it is a progressive continuum that provides increasing influence in decision making to the community. If the only intent of

the proposed Distributed Energy Resource Public Engagement Pilot is that it be positioned at the “Empower” step in the IAP2 spectrum, then PSE has acknowledged in past testimony that its planned community engagement process is not reflective of the “Empower” step and is instead most reflective of the ‘Involve’ step in the spectrum with some actions reflective of the ‘Collaborate’ step.