

**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. 190:

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

Witness Einstein testifies that PSE’s Community Solar product helps “low income and named community customers overcome financial barriers to participating in the program,” and that Schedule 134 of PSE’s Community Solar product “is an example of PSE’s efforts and intent to provide increased renewable energy benefits to our most vulnerable customers.” WTE-1T at 21:15–22:05.

- a. What criteria other than income does PSE use to determine eligibility and/or priority enrollment in PSE’s Community Solar product? Please identify the pages of the CEIP and supporting documents that explain any additional criteria.
- b. How does PSE define the term “most vulnerable customers” as used above?
- c. Does PSE agree that factors other than income should influence its assessment of which customers are “most vulnerable” as used above?

Response:

- a. Puget Sound Energy’s (“PSE”) Community Solar product is available to all PSE electric customers. PSE intends to make at least 20% of the total shares available at no-cost to income-eligible customers so that they can receive the additional financial benefits of the subscription without the up-front barrier of the monthly subscription fee paid by all other participants.
- b. In the Prefiled Rebuttal Testimony of William T. Einstein, Exh. WTE-1T, pages 21-22, PSE defines the term “most vulnerable customers” to mean those customers with a higher energy burden and that have self-certified to be at or below 200% of federal poverty level.
- c. Yes, PSE agrees that factors other than income should influence the assessment of which customers are most vulnerable; however, PSE feels that a customer’s income level is most directly correlated with need and therefore has been linked to the benefits resulting from a reduction in energy burden. PSE’s outreach efforts will continue to consider how best to reach customers with other vulnerability factors such as race and linguistic isolation.