

**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. 193:

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

Witness Einstein testifies that PSE will “reevaluate a rent-to-own solar program in light of the potential benefits suggested by NVEC and Front and Centered” and “if appropriate, consider including a rent-to-own solar program in PSE’s 2025 CEIP.” WTE-1T at 25:8–25:15.

- a. Please provide all documents relevant to PSE’s “reevaluat[ion of] a rent to own solar program.”
- b. How does PSE define “appropriate” as used above? Please include a list of the criteria PSE will use to assess whether such a program is “appropriate.”

Response:

- a. Puget Sound Energy (“PSE”) objects to Front and Centered and NW Energy Coalition Data Request No. 193(a) as vague and ambiguous. PSE further objects to Front and Centered and NW Energy Coalition Data Request No. 193(a) as purporting to impose obligations upon PSE in excess of those required by the Commission’s discovery rules (WAC 480-07-400 through 480-07-425). Without waiving such objections, and subject thereto, PSE responds as follows: PSE does not currently possess any additional documents relevant to the reevaluation of a rent-to-own solar program, other than those already contained in the record in this proceeding.
- b. PSE’s evaluation of appropriateness, as that term is used on page 25 of the Prefiled Rebuttal Testimony of William T. Einstein, Exh. WTE-1T, may include such inputs as customer interests, market potential, and cost effectiveness.