

**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. 194:**

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

Witness Einstein testifies that “PSE is willing to apply a minimum percentage of spending designation to Distributed Energy Resource products and services for inclusion in the Biennial CEIP Update.” WTE-1T at 28:10–28:12. Witness Einstein notes that PSE’s Transportation Electrification Plan includes “a commitment to target 30 percent of spend[ing] within each transportation electrification integrated product and service to support equity-focused customers. PSE believes that a similar process could result in similar results in programs for the 2025 CEIP.” WTE-1T at 28:13–28:20.

- a. How does PSE define “equity-focused customers” as used above? Please explain the differences between “equity-focused customers,” vulnerable populations, and highly impacted communities.
- b. Is PSE willing to apply minimum spending designations in the Biennial CEIP Update, WTE-1T at 28:12, or is PSE unwilling to include such designations until the 2025 CEIP, WTE-1T at 28:20? If the minimum designations PSE is willing to apply in the Biennial CEIP Update differ from the minimum designations PSE might include in the 2025 CEIP, please explain the difference.
- c. Is PSE willing to apply minimum designations to energy benefits instead of “spending”? Please explain.
- d. Do you agree that in the 2021 CEIP, PSE has proposed installed capacity of its Battery Leasing program of 3.8 MW; of that, 0.3 MW is designated for income-eligible customers, reflecting approximately 7% of total storage leasing MW capacity (CEIP Table 2-15)? Please answer yes or no, and explain your answer.
- e. Do you agree that in the 2021 CEIP, PSE’s proposed Customer-Sited Solar + Storage Program is projected to be 12.5 MW of market potential of solar capacity (Appendix D-1, Table D-4), with no specific amount designated for income qualified customers or named communities? Please answer yes or no, and explain your answer.
- f. Do you agree that PSE has proposed a total of 80 MW for distributed solar (across multiple products) in the 2021 CEIP? Please answer yes or no, and explain your answer.
- g. Do you agree that in the 2021 CEIP, only 9.88 MW (across multiple products) of distributed solar are explicitly allocated for income-eligible customers, highly

impacted communities, or multifamily customers? Please answer yes or no, and explain your answer.

- h. If you answered no to the previous question, please identify the pages in the CEIP that explicitly allocate additional MW from specific distributed solar products for income-eligible customers, highly impacted communities, or multifamily customers.

**Response:**

- a. Puget Sound Energy (“PSE”) has defined “equity-focused customers” in Electric Service Schedule 583, Electric Vehicle Charging Products & Services, which was approved by the Commission on March, 26 2022, under Docket UE-220294, as “a customer that is part of Named Communities or a Customer that shares demographic characteristics with Customers in Named Communities; and Community Based Organizations (“CBOs”), government agencies and tribal entities that serve them.” Further, in Electric Service Schedule 583, PSE defined Named Communities to “include both Highly Impacted Communities and Vulnerable Populations.” Therefore, under Schedule 583, equity-focused customers are inclusive of both vulnerable populations and highly impacted communities. The Company has not used this definition beyond Schedule 583. Attached as Attachment A to PSE’s Response to Front and Centered and NW Energy Coalition’s Data Request No. 194, please find a copy of PSE’s Electric Service Schedule 583, Electric Vehicle Charging Products & Services.
- b. As stated on page 28, line 12 of the Prefiled Rebuttal Testimony of William T. Einstein, WTE-1T, PSE is willing to apply minimum spending designations to Distributed Energy Resource products and services for inclusion in the 2023 Biennial Clean Energy Implementation Plan (“CEIP”) Update, and that based on engagement with the Commission and interested parties, would include any modifications to such a minimum spending designation in the 2025 CEIP.
- c. PSE has not conducted the necessary analysis to commit to applying a minimum designation to energy benefits instead of “spending. However, PSE is open to working with the Commission and interested parties to determine if there is a designation other than spending that might be more appropriate and, if so, include any modifications to any minimum designation in the 2025 CEIP.
- d. Yes, PSE agrees 0.3 megawatts (“MW”) represents 7.8 percent of 3.8 MW. However, it is important to point out that the primary reason the income-eligible MW market potential for the battery leasing program does not equate to the ratio of PSE’s total income eligible customers is technical and economic factors limiting PSE’s forecasts. These factors include but are not limited to:
- The percentage of PSE’s total income-eligible population that lives in a single-family residence;

- The percentage of income-eligible customers living in a single-family residence who own their place of residence;
  - The percentage of single-family, income-eligible, homeowners who would participate in a specific program based on expected economic benefit from participation.
- e. No, PSE disagrees with the statement in Front and Centered and NW Energy Coalition's Data Request No. 194(e). Table D-4 (page 10) in Appendix D-1 of PSE's 2021 CEIP projects 14.7 MWs of solar for the Customer-Sited Solar + Storage program selected for PSE's preferred portfolio, not 12.5 MW, as stated above. The market potential for the Customer-Sited Solar + Storage Program, as found in Table D-3 of Appendix D-1, not Table D-4, notes a maximum market potential of 15.28 MWs from 2022-2025.

In response to the second part of Front and Centered and NW Energy Coalition's Data Request No. 194(e), no, there are no specific amounts designated for income qualified customers or named communities. This is due to the market potentials of the combined preferred portfolio Residential PSE Battery Leasing – Income Eligible and Residential Rooftop Solar Leasing – Income Eligible programs being directly competitive with a specific Income Eligible Customer-Sited Solar + Storage offering.

- f. Yes, as detailed on page 4 of PSE's 2021 CEIP, PSE has proposed a target of 80 MW of new distributed solar resources.
- g. No, PSE disagrees with the proposition in Front and Centered and NW Energy Coalition's Data Request No. 194(g). Referencing Table D-4 (page 10) of Appendix D-1, between 2022-2025 PSE allocated 11.87 MWs of distributed solar explicitly to income-eligible customers, highly impacted communities, or multi-family customers in PSE's preferred portfolio per the program breakout below:
- PSE Community Solar Income-eligible – 4.00 MW;
  - Multi-family Community Solar – 5.2 MW;
  - Residential Rooftop Solar Leasing – Income Eligible – 0.68 MW;
  - Multi-family Solar Partnership – 0.33 MW;
  - Multi-family Rooftop Solar Incentive – 1.66 MW.
- h. Please see PSE's Responses to Front and Centered and NW Energy Coalition's Data Request No. 194(a) through (g), above, for the applicable document and page references requested in Front and Centered and NW Energy Coalition's Data Request No. 194(h).

**ATTACHMENT A to PSE's Response to  
FRONT AND CENTERED AND  
NW ENERGY COALITION  
Data Request No. 194**

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**PUGET SOUND ENERGY**  
**Electric Tariff G**

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**SCHEDULE 583**  
**ELECTRIC VEHICLE CHARGING PRODUCTS AND SERVICES**

1. **PURPOSE:** To promote and facilitate the adoption of electric transportation by supporting consumer choice through 1) provision of Electric Vehicle (“EV”) charging products and services to existing EV drivers, 2) providing education and outreach materials to potential EV drivers, 3) developing and implementing transportation pilot projects, and 4) promoting equitable access to transportation electrification. The Company will establish and manage, at its sole discretion, several EV charging products and services that balance the interest of all classes of Customers and public at large. Individual products and services are described under Electric Service Schedules numbered between 501 and 599. (C)  
(C)
2. **AVAILABILITY:** The Electric Services described in Electric Service Schedules numbered between 501 and 599 are available to Customers receiving Electric Service under Electric Tariff G from the Company, as well as other participants and Hosts, as specified in the schedules noted above. These Electric Services are available to owners of facilities and also may be provided to tenants of those owners who have obtained appropriate owner consent.
3. **SOURCE OF FUNDING:** Availability of all products, services, and incentives offered in Electric Service Schedules numbered 501 through 599 is subject to the availability of funding. Costs of products, services and other incentives funded by federal or state or municipal government programs, if available, may, at the discretion of the Company, be used to fund these Electric Services. Funding may also be specified in individual services and products Electric Service Schedules.

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**PUGET SOUND ENERGY  
Electric Tariff G**

**SCHEDULE 583  
ELECTRIC VEHICLE CHARGING PRODUCTS AND SERVICES**

(Continued)

4. **DEFINITIONS:** Unless specifically indicated, the following terms when used in this schedule and in the electric vehicle charging products and services schedules numbered between 501 and 599 shall have the meanings given below:
- A. **Charging Port** is a socket outlet that provides the electricity to charge one vehicle at a time. (N) |
  - B. **Community-Based Organizations or CBO** are essential and trusted service providers for the communities they serve. Examples include but are not limited to: social service organizations, food banks, affordable housing providers or non-emergency medical transportation providers that serve Equity-Focused Customers. |
  - C. **Company-Side Facilities** are the facilities and the Normal Construction costs, as defined in Schedule 85, to install on the Company side of the Point of Delivery. Includes labor (engineering design and construction), materials (primary or secondary underground or overhead service conductors, poles to support overhead service conductors, transformers, vaults, pads, conduits, cable ducts, metering, and trenching), and permits and other costs and materials that may be applicable as noted in Schedule 85. (K) |
  - D. **Dedicated Charging** includes any Electric Vehicle charging where the primary user of the EV charger is the Site Host. This includes single family residential, fleet charging, and multifamily residential where the tenant owns the parking space. | (N)
  - E. **Education and Outreach Service** includes, but is not limited to, print or digital communications, events, trainings, advertising, and such equipment and personnel necessary to support these services. |
  - F. **EV** stands for Electric Vehicle, which includes any form of transportation that is propelled by electricity that is supplied in whole or part from electricity sources not generated on the vehicle itself. |
  - G. **Electric Vehicle Charger or EV Charger** means a device used to supply electricity to an Electric Vehicle. (K)

(K) Transferred to Sheet 583-B

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**SCHEDULE 583  
ELECTRIC VEHICLE CHARGING PRODUCTS AND SERVICES**

(Continued)

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|--|---|
| 4. <b>DEFINITIONS</b> (Continued):   | (K) (C)                                     |
| H. <b>Electric Vehicle Supply Equipment or EVSE</b> means equipment or system that delivers electrical energy from an electricity source to charge a plug-in electric vehicle, which may include Direct Current Fast Charger (DCFC), Level 2, or other such equipment.   | (N)<br>   <br>                              |
| I. <b>Environmental Attribute</b> is the quantifiable benefit to society associated with displacing gasoline and diesel usage by employing the practice of electrification of the transportation system.   | (M)<br>  (N)  <br>  (M)                     |
| J. <b>Equity-Focused Customer</b> is a Customer that is part of Named Communities or a Customer that shares demographic characteristics with Customers in Named Communities; and the Community Based Organizations (CBOs), government agencies and tribal entities that serve them.  | (N)<br>   <br>   <br>                       |
| K. <b>Highly Impacted Communities or HIC</b> means a community designated by the department of health based on the cumulative impact analysis required by RCW 19.405.140 or a community located in census tracts that are fully or partially on "Indian country" as defined in 18 U.S.C. Sec. 1151.  | <br>   <br>   <br>  (N)                     |
| L. <b>Host</b> includes any Customer who owns or manages or occupies one or more commercial or multi-family or mixed-use building and is qualified by the Company to have the Company-provided charger(s) or a Customer-owned charger(s) at the Customer's site such as a workplace, a parking lot of multi-unit dwellings, or a fleet garage.   | (M)<br>   <br>   <br>  (M)                  |
| M. <b>Host-Side Facilities</b> are the facilities and costs to install EVSE on the Host side of the Point of Delivery. Costs includes labor (engineering design, construction and trenching), materials (electrical panel and other), electric vehicle supply equipment, and easement-related expenses. Additional costs may include any electric fleet management software, communications equipment, networking fees, improvements for accessibility, commissioning, and upfront preventative/corrective maintenance packages. | (N)<br>   <br>    (M)<br>(K)    <br>   <br> |
| N. <b>Named Communities</b> includes both Highly Impacted Communities and Vulnerable Populations.  | <br>  |
| O. <b>Reporting Rights</b> is the right to report the ownership of accrued and accumulated Environmental Attributes and energy savings to any agency, authority or other party, without limitation, or under any past, present or future international, foreign, federal, state or local government or voluntary regulation or trading program, of the Company's exclusive ownership of the Environmental Attributes.  | (N) (M)                                     |

(M) Transferred from Sheet 583-A

(K) Transferred to Sheet 583-C

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**SCHEDULE 583  
ELECTRIC VEHICLE CHARGING PRODUCTS AND SERVICES**

(Continued)

- 4. **DEFINITIONS** (Continued):
    - P. **Smart Charger** is a type of Electric Vehicle Charger that enables control of the charging power and/or timing of the Electric Vehicle. (K) (C)
    - Q. **Shared Charging** includes any EV Charger where the primary users of the EV Charger include more than the site Host. This includes multifamily residential, workplace, and public charging. (M)
    - R. **Vulnerable Populations or VP** means communities that experience a disproportionate cumulative risk from environmental burdens due to: Adverse socioeconomic factors, including unemployment, high housing and transportation costs relative to income, access to food and health care, and linguistic isolation; and sensitivity factors, such as low birth weight and higher rates of hospitalization. These communities are stated in PSE's approved Clean Energy Implementation Plan. (N)
  
  - 5. **DESCRIPTION OF PRODUCTS AND SERVICES:** The Company will provide electric vehicle charging products and services as described in Schedules numbered between 501 and 599. This Electric Service includes, but is not limited to the following products and services:
    - A. Education and Outreach, information, training in electric vehicle technologies, electric vehicle charging technologies or practices and products to encourage efficient electrification of the transportation system. (M)
    - B. Analyses, outlined in Section 6 of this Schedule, to identify opportunities to encourage electrification of the transportation systems.
    - C. Products and services to facilitate the procurement or use of electric vehicles and/or chargers, including facilitation of access to financing, reduction of the energy cost for energy provided for electric vehicles, differing rates for the energy for electric vehicles, or promotion of different modes of electric transportation.
    - D. Funding or services to encourage the installation of EV Chargers or procure Electric Vehicles where appropriate to support efficient electrification of the transportation system.
    - E. Electric vehicle charging products and services for special classes of Customers.
    - F. Pilot projects to collect data on EV performance or EV charging or to test new Electric Services, products, technologies, system benefits or Customer acceptance.
- (K) Transferred to Sheet 583-E  
(M) Transferred from Sheet 583-A and 583-B, respectively

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**SCHEDULE 583  
ELECTRIC VEHICLE CHARGING PRODUCTS AND SERVICES**

(Continued)

- 5. **DESCRIPTIONS OF PRODUCTS AND SERVICES** (Continued): (M) (C)
  - G. Monitoring or measuring energy usage or charging pattern or other indicators to analyze, verify or evaluate electric vehicle charging products and services. |
  - H. Reporting and evaluation of the effectiveness of products and services provided, including participation in the development of common evaluations or evaluation protocols. |
  - I. System savings or benefits from the Company's electric generation, transmission and/or distribution facilities. |
  
- 6. **ANALYSES:** Unless otherwise specified in applicable electric vehicle charging products and services Electric Service Schedules, the Company will use energy use estimates based on analyses using engineering techniques, third party studies, regionally accepted standards, historical energy use, current operations, existing equipment, on-site data acquisition, Customer input and products and services implemented. (K) |
  
- 7. **PRODUCTS AND SERVICES:** Schedules 501-599 provide several types of Electric Service through products and services to support transportation electrification. (K) |
  
- 8. **SPECIAL CONDITIONS:** Pilot projects and demonstration projects may be undertaken to determine whether certain strategies, products or services effectively promote transportation electrification over an extended period of time. Pilots are employed to test ways to demonstrate market opportunities for electrification of the transportation system. Pilots may include tests of service and product cost and performance, Customer acceptance or delivery methods. (M)
  
- 9. **TERMINATION:** Products and services under this Schedule will terminate on December 31, 2043. However, commitments, agreements, and Service Agreements entered into prior to termination will be honored.

(K) Transferred to Sheet 583-E

(M) Transferred from Sheets 583-B and 583-C, respectively

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**PUGET SOUND ENERGY**  
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**SCHEDULE 583**  
**ELECTRIC VEHICLE CHARGING PRODUCTS AND SERVICES**

(Continued)

10. **GENERAL RULES AND PROVISIONS:** Electric Service under this Schedule is subject to (M)  
the General Rules and Provisions contained in this tariff (Schedule 80), as they may be I  
modified from time to time, and to other schedules of the tariff that may from time to time I  
apply to this Schedule. (M)

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