

**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. 226:**

**Topic:** Einstein Testimony (Battery Leasing)

In response to testimony criticizing PSE’s rooftop solar leasing product proposed in the CEIP, Witness Einstein testifies that PSE will “reevaluate a rent-to-own solar program” and will share the results of that reevaluation in the 2023 Biennial Update. WTE-1T at 25:8–25:15.

- a. Is PSE also planning to reevaluate its residential battery leasing program in response to testimony from Witness McCloy and Witness Shah raising concerns with that program? If so, does PSE plan to provide the results of that reevaluation in the 2023 Biennial Update?
- b. Has PSE conducted any analysis on whether PSE’s residential battery leasing product would increase energy burden for named communities and/or energy burdened customers? If so, please provide that analysis and any supporting documentation.
- c. Please confirm that under PSE’s proposed residential battery leasing program, PSE expects to charge participating residential customers a monthly fee for their participation, as noted in Table 2-9 of the CEIP.
- d. Please confirm whether under PSE’s proposed commercial and industrial battery leasing program, PSE expects to give a lease payment to participating commercial and industrial customers for their participation, as noted in Table 2-9 of the CEIP.

**Response:**

- a. Puget Sound Energy (“PSE”) intends to reevaluate any distributed energy resource (“DER”) program, after the Commission has issued an order in this proceeding and will include any substantive data and analysis in support of its regulatory filing package as part of its obligation to secure Commission approval. As appropriate, PSE will include the results of such analysis within the 2023 biennial Clean Energy Implementation Plan (“CEIP”) update. As discussed in the Prefiled Rebuttal Testimony of William T. Einstein, WTE-1T, at 12:4-6, “PSE will file with the Commission, under separate dockets, distinct electric service tariff schedules necessary to meet the targets established in

the 2021 CEIP after the Commission has issued an order in this proceeding”. While Witness McCloy and Witness Shah raise concerns, Witness Shah, EXH. LAS-1T; pg. 7:2, characterized those as “general concerns” without any substantiating evidence in support of those general concerns. Further, Witness McCloy’s testimony focused on the designation of benefits of the proposed battery leasing income-eligible program concept, to which Witness Einstein, WTE-1T; 28:10-12, has already testified 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.”

- b. PSE has not conducted an analysis on whether PSE’s residential battery leasing product would increase energy burden for named communities and/or energy burdened customers.
- c. Yes; as detailed in Table 2-9: Distributed Battery Storage Programs of PSE’s CEIP, customers would pay a monthly fee for backup power services. However, as detailed on page 133, Chapter 4 of the CEIP, “[f]or income-eligible customers, PSE will look to further reduce or eliminate fees to increase affordability and will also identify customers located in areas with higher outages and lower reliability.”
- d. Yes, PSE expects to offer a space leasing payment to participating commercial customers for PSE to lease space to deploy front-of-the-meter battery energy storage systems. The lease payment is necessary to ensure PSE can secure the rights to site and operate the PSE owned and operated battery storage facility at the commercial customers’ site.