

**EXH. AJP-__X
DOCKET UE-210795
2022 PSE CEIP
WITNESS: AUSTIN J. PHILLIPS**

**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
AUSTIN J. PHILLIPS
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. 195:

Topic: Phillips Testimony (VP Designations)

Witness Phillips testified that "In cases where there is a trustworthy, publicly available source of customer-level data to quantify a vulnerability factor, PSE applied that source." Phillips, AJP-1T, at 6:4–6. First, does the "publicly available" qualifier in that statement mean that PSE did not draw on any sources of customer data that are available to PSE (but not available to the public)? Second, please list and describe the sources of customer-level data that PSE apply, and indicate which vulnerability factor PSE measured with this customer-level data.

Response:

In response to the first question in Front and Centered and NW Energy Coalition Data Request No. 195, no - to quantify some vulnerability factors, Puget Sound Energy ("PSE") used customer level data unavailable to the public.

In response to the second question in Front and Centered and NW Energy Coalition Data Request No. 195, please see Chapter 3 of PSE's 2021 Clean Energy Implementation Plan, Table 3 – 2 Expanded Factors by Data Resource/Scale on page 54. The third column of that table, "Data Scale," indicates which vulnerability factors PSE quantified at the customer level.