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. 198:

Topic: Phillips Testimony (VP Designations)

Witness Phillips testified that the "methodologies and data" that PSE used to designate Vulnerable Populations "an improvement" over the methodologies and data PSE relied on to identify "high need communities" and "potentially under-served customers" in the BCP. In what ways are the "methodologies and data" that PSE used to designate Vulnerable Populations "an improvement" over the methodologies and data PSE relied on to identify "high need communities" and "potentially under-served customers" in the BCP?

Response:

Puget Sound Energy's ("PSE") methodology for identifying and quantifying vulnerable populations improved on the Biennial Conservation Plan ("BCP") cited study inclusive of both features of "high need communities" and "potentially under-served customers" in four ways.

First, per the Clean Energy Transformation Act ("CETA"), the process involved guidance from PSE's Equity Advisory Group ("EAG") to identify which attributes of vulnerability to include. The insight from EAG members provides a first-hand account of the lived experiences and burdens within the communities they serve and reside.

Second, PSE improved the measure of energy burden of its customer base. In the BCP study, PSE used estimates of income and monthly energy bills from U.S. Census Public Use Microdata Sample ("PUMS"), which are anonymized from a larger spatial extent than a census tract to estimate energy burden. At the time, those estimates were useful, but PSE brought more precision to bear on the factor of energy burden by using its individual customer estimates in the CEIP analysis. Furthermore, PSE improved the estimates available from the Department of Energy National Renewable Energy Laboratory LEAD Tool by using its actual customer billing data, estimated customer income, and complementary estimated energy costs from the LEAD Tool. This significantly improved the precision of PSE's understanding of energy burden at the individual customer level.

A third dimension where PSE improved its methodology and data in comparison with the BCP cited study was improved accuracy. The BCP study used census household counts to estimate eligible customers at the block group level. In this application, block group geographies presented edge cases which required estimation of what percentage of the total households reported were actually PSE customers. The CEIP uses actual customer counts where applicable in tabulating its metrics.

A fourth dimension of improvement for the CEIP analysis in contrast with the BCP cited study is the vintage of data. Because the BCP analysis was conducted at an earlier time than the CEIP, it necessarily used older vintages of data.