

**EXH. GA-\_\_X  
DOCKET UE-210795  
2022 PSE CEIP  
WITNESS: GILBERT ARCHULETA**

**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  
GILBERT ARCHULETA  
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. 179:**

**Topic:** Archuleta Testimony (Geo-Targeting, LIW, Co-Deployment, Demand Response, Workforce Development, CBIs and Metrics)

In rebuttal testimony, Witness Archuleta states that “PSE has been geo-targeting outreach to the customers and community-based organizations in census blocks that [PSE’s low income needs assessments] identified as having the highest unmet need. PSE will continue geo-targeting the Low Income Weatherization Program based on customer priority needs (e.g., high energy burden, income eligibility, named communities).” GA-1T at 12:3–12:7.

- a. How does PSE define “geo-targeting” as used above? Please identify the pages of the CEIP and supporting documents that explain this term.
- b. How does PSE define the term “highest unmet need” as used above? Please identify the pages of the CEIP and supporting documents that explain this term.
- c. Is PSE geo-targeting customers with the “highest unmet need” for DER programs other than the Low Income Weatherization Program? If yes, please explain, and identify the pages of the CEIP that discuss these programs.
- d. Does PSE propose in its CEIP to geo-target customers with the “highest unmet need” in programs other than the Low Income Weatherization Program? If yes, please identify the sections of the CEIP that so propose.
- e. How does PSE define the term “customer priority needs” as used above? Please identify the pages of the CEIP and supporting documents that explain this term.
- f. Please identify the pages of the CEIP and supporting documents that explain how PSE engages in geo-targeting based on “customer priority needs.”
- g. What “customer priority needs (e.g., high energy burden, income eligibility, named communities)” that are not income-based does PSE use to geo-target its Low Income Weatherization Program? Please explain.
- h. What “customer priority needs” that are not income-based does PSE use to geo-target DER programs other than its Low Income Weatherization program? Please explain.

**Response:**

- a. The term “geo-targeting” is not formally defined or used in Puget Sound Energy’s (“PSE”) 2021 Clean Energy Implementation Plan (“CEIP”) or supporting documents outside of the Prefiled Rebuttal Testimony of Gilbert Archuleta, Exh. GA-1T. PSE uses the term geo-targeting, as it is commonly used in marketing, to describe the practice of delivering program information in specific geographic locations to customers who meet certain criteria, like behaviors, and demographics.
- b. For the definition PSE uses of “highest unmet need,” please refer to the Third Exhibit to the Prefiled Rebuttal Testimony of Gilbert Archuleta, Exh. GA-4, pages 29-31, and Appendix A, for the PSE Low Income Household Needs Assessment (“LINA”) Study, Final Report.
- c. No. “Highest unmet need” is a term defined in PSE’s LINA Study, Final Report, which was included in the Third Exhibit to the Prefiled Rebuttal Testimony of Gilbert Archuleta, Exh. GA-4, pages 29-31 and Appendix A. PSE used this term specifically in response to LINA Assessment, which pre-dates PSE’s 2021 CEIP. PSE will leverage definitions in the CEIP going forward.
- d. No. “Highest unmet need” is a term defined in PSE’s LINA Study, Final Report, which was included in the Third Exhibit to the Prefiled Rebuttal Testimony of Gilbert Archuleta, Exh. GA-4, pages 29-31 and Appendix A. PSE used this term specifically in response to LINA Assessment, which pre-dates PSE’s 2021 CEIP. PSE will leverage definitions in the CEIP going forward.
- e. PSE identified customer priority needs as high energy burden, income eligibility, and named communities. The phrase “customer priority needs” is not formally defined or used in PSE’s 2021 CEIP or supporting documents outside of Mr. Gilbert’s testimony.
- f. The phrase “customer priority needs” is not formally defined or used in PSE’s 2021 CEIP or supporting documents outside of this testimony. The term was used in Mr. Archuleta’s testimony to convey that PSE’s geo-targeting strategies and tactics will be informed by customers’ needs.
- g. The phrase “customer priority needs” is not formally defined or used in PSE’s 2021 CEIP or supporting documents outside of this testimony. As stated in PSE’s Response to Front and Centered and NW Energy Coalition’s Data Request No. 179(f) above, the term was used in Mr. Archuleta’s testimony to convey that PSE’s geo-targeting strategies and tactics will be informed by customers’ needs.

As part of low-income outreach, PSE intends to use Named Communities as a geo-targeting input. Named Communities are determined by many characteristics that are not income-based. See the discussion in PSE's 2021 CEIP, Chapter 3, pages 48-63, which discusses how Named Communities are identified.

- h. PSE has not yet defined "customer priority needs" to geo-target distributed energy resource ("DER") programs because it does not currently have approved electric service schedule tariffs for the DER products or services other than the Commission-approved PSE's community solar project services under electric service tariff Schedule 134. Please see PSE's Response to Front and Centered and NW Energy Coalition's Data Request No. 190 for an explanation of the criteria PSE uses to determine eligibility and/or priority enrollment in PSE's Community Solar product.

As stated in the Prefiled Rebuttal Testimony of William T. Einstein, WTE-1T, at 10:4-6, "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." At that juncture, PSE will outline customer priority needs, which may include high energy burden, income eligibility, or named communities.