

**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. 181:

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

Witness Archuleta testifies that “PSE has considered the type of ‘co-deployment’ proposed by Witness Reeves, but that the “important details” of these measures “are best addressed . . . in the development of the next Biennial Conservation Plan.” GA-1T at 14:9–14:17.

- a. Please provide all documents where PSE has “considered” or otherwise analyzed specific co-deployment strategies.
- b. Please identify where in the most recent BCP PSE has committed to develop “the important details” of a co-deployment strategy in the next BCP.
- c. Does PSE agree that its CEIP should be approved subject to the condition that PSE develop a co-deployment strategy across DER programs in its next BCP?
- d. Please explain whether a co-deployment strategy that considers the synergies between DER programs and energy efficiency measures (such as the synergy between community solar enrollment and efficiency measures) should be considered exclusively in the BCP process. If yes, please explain why the BCP process is the appropriate forum to consider solar, storage, and other programs not specifically analyzed in that docket.
- e. Is it PSE’s position that the requirements of CETA—such as CETA’s mandates to reduce burdens to named communities and to ensure that all customers are benefitting from the clean energy transition—do not apply to PSE’s actions pertaining to energy efficiency, demand response, or low-income weatherization?

Response:

- a. Puget Sound Energy (“PSE”) does not have any documents responsive to Front and Centered and NW Energy Coalition Data Request No. 181. PSE is currently in the planning process for the 2024-25 Biennial Conservation Plan (“BCP”). The draft BCP is scheduled to be presented to the Conservation Resource Advisory Group (“CRAG”) in October of 2023 and filed with the Commission in November 2023. All facets of program development and implementation will be included in the upcoming BCP.

- b. The current BCP, filed in November 2021, pre-dates the discussion around “co-deployment.” The upcoming BCP, scheduled to be filed with the Commission in November 2023, will address “co-deployment” strategies as appropriate.
- c. No, PSE does not agree that its Clean Energy Implementation Plan should contain a condition that PSE develop a co-deployment strategy across distributed energy resource (DER) programs in its next BCP.
- d. While a co-deployment strategy could be considered as part of a future BCP, PSE does not assert that a co-deployment strategy should be considered exclusively in the BCP process.
- e. No. PSE has historically considered program impacts to named communities and strives to achieve equitable outcomes as it relates to energy efficiency, demand response and low-income weatherization.