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. 187:

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

Witness Archuleta's testimony takes issue with non-energy benefit metrics that are not easily quantifiable in dollars. GA-1T at 15:14–16:21. Is it PSE's position that the CBIs and metrics called for by CETA must all be capable of being expressed as a dollar value?

Response:

Puget Sound Energy ("PSE") objects to Front and Centered and NW Energy Coalition Data Request No. 187 as mischaracterizing testimony and assuming facts that are not in evidence in this proceeding. Without waiving such objections, and subject thereto, PSE responds as follows:

PSE's testimony referenced in Front and Centered and NW Energy Coalition Data Request No. 187 was specifically addressing non-energy benefits and how they relate to customer benefit indicators ("CBIs") and are used in cost-effectiveness analysis for PSE's conservation programs. PSE was not stating a position that all CBI's and metrics must be expressed in dollar value. As noted in Exh. GA-1T at 16:8-9, PSE provided an example of a metric that counts program participants from vulnerable populations, which is not expressed in dollars. Exh. GA-1T 16:10-21 was intended to describe limitations in translating non-energy benefits into quantitative measurement used in energy efficiency cost effectiveness tests, not that all non-energy benefits must be easily quantified in dollars.

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Date of Response: 01/18/2023
Person who Prepared the Response: Dan Anderson
Witness Knowledgeable About the Response: Gilbert Archuleta