

**EXH. KKD-__X
DOCKET UE-210795
2022 PSE CEIP
WITNESS: KARA K. DURBIN**

**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
KARA K. DURBIN
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. 186:

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

Witness Archuleta's testimony takes issue with a proposed metric measuring deaths or hospitalizations due to extreme heat because it would not solely reflect PSE's actions. GA-1T at 17:1–15.

- a. Is it PSE's position that the only CBIs and metrics required by CETA are metrics that reflect solely effects attributable directly to PSE's actions?
- b. Does PSE agree that CBIs and metrics that measure disparities in the burdens borne by different communities are necessary to allow PSE to fulfill CETA's mandate to reduce burdens to named communities and ensure that all customers are benefitting from the clean energy transition?
- c. How does PSE reconcile Witness Archuleta's criticism on this point with Witness Durbin's statement that PSE's equity framework "is intended to help PSE have a deeper understanding of the current disparities that its customers face that may serve as a barrier to participating in future clean energy programs"? KKD-6T at 17:2–5.

Response:

- a. Puget Sound Energy ("PSE") objects to Front and Centered and NW Energy Coalition Data Request No. 186(a) 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:

No. PSE's understanding of customer benefit indicators ("CBIs") and metrics under the Clean Energy Transformation Act ("CETA") is still evolving. PSE's position is that CBIs and associated metrics should capture effects that can be reasonably affected by utility action wherever possible.

- b. No. While disparities in the burdens borne by different communities must be assessed as part of PSE's work, CBIs and metrics that specifically measure the disparities may not be necessary in order to fulfill CETA's mandate to reduce

burdens to named communities and ensure all customers benefit from the clean energy transition.

- c. Witness Archuleta's statement referenced in Front and Centered and NW Energy Coalition Data Request No. 186 refers to the use of metrics. Witness Durbin's statement referenced Front and Centered and NW Energy Coalition Data Request No. 186(c) is related to the holistic equity assessment framework and understanding the disparities and burdens customers face. The metrics discussed in Witness Archuleta's testimony refers to metrics that PSE can take actions on and show progress. The intent of these metrics is to show how PSE's actions are helping to make progress. As stated in Witness Archuleta's testimony, the factors that impact customers based on extreme heat events vary and may be due to factors outside of PSE's control. Overall, disparities look at all factors or burdens customers face, whereas the customer benefit indicators metrics generally measure an outcome that may be attributable to a specific action.