

**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. 211:**

**Topic:** Durbin Testimony (CETA's Equity Mandate, CBIs and Metrics, Public Process/Community Engagement/ Empowerment Pilot)

Witness Durbin explained that PSE selected metrics for which there was available data. She expressed doubt as to the availability of data corresponding to several metrics proposed by the parties, including indoor air quality and illness and hospitalization correlated with extreme heat events, and she criticized Mr. Colton for failing to point PSE towards data sources for these metrics. KKD-6T at 20:1–22:1.

- a. Did PSE undertake any efforts to determine whether this data is available?
- b. If so, please describe those efforts.

**Response:**

Puget Sound Energy (“PSE”) objects to Front and Centered and NW Energy Coalition Data Request No. 211 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:

Please see Exh. KKD-6T at 21:9-15 for Witness Durbin’s testimony regarding the variability, availability, and applicability of the data referenced in Front and Centered and NW Energy Coalition Data Request No. 211.

- a. No, upon receiving the Prefiled Response Testimony of Roger D. Colton, Exh. RDC-1T, PSE did not undertake efforts to research whether the data requested by Mr. Colton is available. As stated by Witness Durbin at Exh. KKD-6T 21:17-22:1, “Mr. Colton does not suggest a data source for tracking the information he requests.”
- b. Not applicable.