

**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. 214:

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

Witness Durbin testifies that the “practical challenges” associated with making changes to PSE’s CBIs before the 2025 CEIP include the need to “finalize the metrics and identify and secure the necessary baseline data.” KKD-6T at 24:10–24:21.

- a. Does PSE need to “identify and secure the necessary baseline data” prior to including CBIs in a final CEIP?
- b. How does PSE reconcile Witness Durbin’s testimony that identifying and securing baseline data is a prerequisite to modifying or including new CBIs in the 2021 CEIP, KKD-6T at 24:15–24:16, with Witness Durbin’s testimony that PSE is “in the process of conducting this assessment work” for the CBIs in the final 2021 CEIP, KKD-6T at 26:2–26:5?

Response:

- a. Puget Sound Energy (“PSE”) endeavors to have baseline data for each customer benefit indicator (“CBI”) in its 2025 Clean Energy Implementation Plan (“CEIP”). Some CBIs in the 2021 CEIP do not have baseline data yet because the data will not be available until PSE begins implementing those programs or securing those resources during the 2022-2025 CEIP implementation period. While not all of PSE’s proposed CBIs have baseline data, these CBIs were the product of months of work and engagement with advisory and customer groups.
- b. The two statements referenced in Front and Centered and NW Energy Coalition’s Data Request No. 214(b) are being compared out of context, and the first statement is mischaracterized. Ms. Durbin’s first statement, in Exh. KKD-6T at 24:14–24:16, is in response to the question in Exh. KKD-6T at 24:8–9, “Why is PSE reluctant to make changes to its CBIs for the 2023 Biennial CEIP Update?” Ms. Durbin’s response is not about the 2021 CEIP but regarding the upcoming 2023 Biennial CEIP Update, noting that for any new or modified CBIs, PSE would need time to finalize the metrics and

identify and secure the necessary baseline data for inclusion in the 2023 Biennial CEIP Update, due November 1, 2023.

Ms. Durbin's second statement is in response to the question in Exh. KKD-6T at 25:10–12, "How does PSE respond to Staff's recommendation to develop interim goals for some or all CBIs, in collaboration with the Equity Advisory Group, for inclusion in its CEIP?" PSE reconciles these statements because the statement in Exh. KKD-6T at 24:15–24:16 refers to possible new or modified CBIs for inclusion in the Biennial CEIP Update, whereas the statement on page 26, lines 2 through 5, refers to the development of interim goals for current CBIs. In either case, PSE needs adequate time to conduct this work.

