

**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. 028:**

**DATA REQUESTS DIRECTED TO: Kara Durbin**

**Re: Equity Data**

Please provide a copy of all reports, evaluations, or other written documents within the custody or control of PSE discussing the impact of low-income energy efficiency investments on:

- a. Low-income nonpayment disconnections;
- b. Low-income credit and collection activities;
- c. Low-income level of arrears;
- d. Low-income payment patterns, including but not limited to the lag between the day of customer billings and the day of customer payments;
- e. The frequency with which low-income customers change residences.

**Response:**

Puget Sound Energy (“PSE”) objects to Front and Centered (“FAC”) and NW Energy Coalition’s (“NVEC”) Data Request (“DR”) No. 028 to the extent that it is overly broad and unduly burdensome. PSE further objects to NVEC and FAC DR No. 028 to the extent it seeks information that is obtainable from some other source that is more convenient, less burdensome, or less expensive. Without waiving such objections, and subject thereto, PSE responds as follows:

PSE does not possess reports, evaluations, or other written documents discussing the impact of low-income energy efficiency investments on

- a. Low-income nonpayment disconnections;
- b. Low-income credit and collection activities;
- c. Low-income level of arrears;
- d. Low-income payment patterns, including but not limited to the lag between the day of customer billings and the day of customer payments; or
- e. The frequency with which low-income customers change residences.