

Puget Sound Energy Equity Advisory Group Meeting

Meeting Summary

Monday, September 15, 2025 | 5 – 7 p.m.

Meeting purpose & topics

Equity Advisory Group (EAG) meeting objectives:

- EAG engagement on the equity tensions present in the current Net Energy Metering (NEM) program; Metrics identification in Distributional Equity Analysis (DEA) on Net Energy Metering.
- EAG considerations on the early-stage development of a revised approach to a DEA on the DER “80 MW” portfolio.

Agenda

1. Opening – 5:00 p.m.
2. Distributional Equity Analysis (DEA) on Net Energy Metering – 5:20 p.m.
3. Break – 5:50 p.m.
4. DEA Net Energy Metering Continued – 6:10 p.m.
5. Revising the DEA on DER “80 MW” Portfolio – 6:25 p.m.
6. Public comment – 6:50 p.m.
7. Adjourn – 7:00 p.m.

Meeting summary

The primary purpose of the meeting was to collaborate with the Equity Advisory Group (EAG) to establish a method for assessing the equitable distribution of benefits from Puget Sound Energy's (PSE) Net Energy Metering (NEM) program and broader Distributed Energy Resource (DER) portfolio. Presenters highlighted that existing programs, like NEM, must now be evaluated using an equity lens to understand their impact on historically marginalized communities. The EAG's input focused on the crucial need for data on income and community-level outcomes to ensure programs move beyond simple participation rates and genuinely address systemic inequities.

Below is a summary of the presentations and discussions from the September 15, 2025 EAG meeting. A recording of the presentation portions of the meeting is also available on the [EAG YouTube channel](#).

Opening

Welcome & Safety Moment, and Announcements

Ishmael Nuñez, Uncommon Bridges facilitator, opened the meeting acknowledging Hispanic Heritage Month. Em Piro, PSE Energy Equity Program Manager, presented a Safety Moment, on inequities in the exposure and degree of impact of safety incidents, and providing examples of the ways that safety culture and equity are interrelated. For general housekeeping, members were reminded to RSVP for an upcoming EAG retreat. A new member, Rachel Gates (acting as a community advocate) observed the meeting and made a brief introduction.

Equity Moment

TJ Protho, EAG Member, focused on active listening, emphasizing that it involves understanding rather than just hearing. He provided techniques such as being present, noticing nonverbal cues, and asking open-ended questions, stressing the importance of listening without judgment.

Ishmael welcomed guests (interested LIAC and CRAG members) who were invited to attend the EAG meeting.

Distributional Equity Analysis (DEA) on Net Energy Metering - Navigating Equity Tensions

Regulatory Requirements

PSE must complete a Distributed Equity Analysis (DEA) of our Net Energy Metering (NEM) program by year-end, as required by the UTC in Docket UE-231031. The current NEM program, mandated by legislature as designed in the 1990s, aimed to promote solar adoption. PSE and UTC now have an opportunity to evaluate the current program from an equity lens using the first four steps of a DEA framework.

Previous EAG Engagement

PSE presented and sought feedback from EAG on this topic in previous EAG meetings in 2024 and 2025. PSE has been incorporating EAG feedback along the way. Most recently, the group received a presentation in March 2025 where they discussed step #3 of the DEA process for the NEM program.

General Overview

PSE needs EAG recommendations on metrics to measure equity in the NEM program. Traditional metrics focus on participation rates, capacity installed, and individual bill savings.

PSE seeks advice on equity-focused metrics that capture community benefit, particularly for Named Communities who face barriers to participating in individual investment models. The core question: "Beyond participation rates, how should we measure if Named Communities are benefiting from NEM?"

Michael Wehling, Energy Equity Program Manager - Data Analytics, explained that PSE has used distributional equity analyses in the past to assess equity in programs. He differentiated between **quantitative** and **qualitative** metrics for assessing a program's impact. Quantitative metrics, he noted, might involve counting things like the number of jobs created, while qualitative metrics would address questions of who is getting those jobs, or how the program is perceived by those it's meant to serve. He also stated that PSE has data on the geographic location of customers participating in the program and can map them to areas designated as highly impacted communities to see how income levels and location statuses play out. A DEA can include metrics such as customer participation, changes to customer bills, and whether participation has moved a customer in or out of **energy burden**. The goal of a DEA is to help the company learn about the quality and impact of their programs. Michael and Ishmael both stressed that the discussion was an opportunity to co-create a way to assess the benefits impacts of the NEM program on named communities.

The group was asked to reflect on what types of benefits are experienced with a NEM program (examples range from climate benefits, to economic benefits such as job creation, to household benefits such as return on investments), and how benefits might be felt at the individual versus community level. Generally, EAG feedback revolved around a concern that the net metering program's benefits are not equitable, many communities are left out of the program, potentially favoring wealthier people and marginalized communities with the direct benefit of bill savings that comes with participation and indirect benefits such as quality jobs. EAG members requested data on income breakdowns and outcomes to clearly demonstrate who is benefiting, and they suggested the presentation differentiate between true benefits and disadvantages within a structurally inequitable system. Detailed questions and comments, as well as PSE responses, may be referenced in [Attachment B, the feedback report](#).

Michael invited the group to provide input on what qualitative and quantitative metrics would be most useful with an interactive Mural board to both brainstorm new metrics, and provide feedback on some early ideas of metrics that might be used to assess NEM, acknowledging the tension between simply tracking data and using that data to improve programs to ensure equity is built in.

The proposed qualitative metrics from the EAG suggest conducting a deep, narrative-driven distributed equity analysis. Their proposed metrics focus on gathering rich, actionable information to ensure equitable program access and impact. Specifically, the EAG emphasized tracking geographic location and socio-economic identifiers of participants to

confirm the program is reaching historically underserved communities. They prioritized collecting stories to capture the real-world ease of accessing the program and any felt barriers or stresses, providing crucial context on administrative hurdles. The EAG proposed measuring the effectiveness of community outreach/engagement through feedback and stories, and assessing the successful communication strategy needed to frame the program as an opportunity. Finally, they stressed the importance of measuring tangible benefits by analyzing how participants and organizations benefitted during outages due to solar/storage access, and how participants successfully obtained support (such as financing or organizational assistance) to overcome entry barriers, all with the goal of ensuring NEM programs actively improve the lives and resilience of all communities.

Quantitative metric suggestions focused on extensively tracking demographic data of participants for comparison against state, county, city, and marginalized community populations, along with counting the number of named community beneficiaries and community-based organizations accessing benefits. Other suggestions included financial metrics to quantify the true cost-benefit ratio, including the burden of installing solar versus long-term savings, the dollar amount of energy bill reduction across different usage profiles, and the success rate and time to payoff for financing like loans. Furthermore, the EAG proposed metrics for program access, such as the number of outreach materials translated and the effectiveness of outreach to marginalized communities, while also tracking workforce inclusion by counting contractors and workers from named communities on NEM projects. Finally, to measure resilience, the EAG suggests measuring power outage improvements and the count of customers with emergency power access, along with quantifying the money saved by businesses and how that benefit flows back into communities.

The Mural board may be viewed in [Attachment C](#). Comments and questions in the Bike Rac have been reviewed by PSE teams and are being considered in the DEA, where most applicable.

Break

The group held a break from 6:05 – 6:10pm.

DEA on 80 MW Portfolio

Regulatory Requirements

PSE will also conduct a DEA on our Distributed Energy Resource (DER) “80 MW” Portfolio, as the UTC required in Docket UE-240004 et al. PSE conducted a Pilot DEA on two projects in Community Solar DER program in 2024, in compliance with UTC order in Docket UE-220066 et al. We received feedback from the UTC that we need to expand our pilot DEA to more projects in the DER 80 MW portfolio, and we want to collaborate with the EAG now on our approach for this analysis slated to start in earnest next year.

Previous EAG Engagement

In July 2024, the EAG advised on the Pilot DEA, providing guidance on identifying priority populations, considerations for effective engagement, and thoughts on the methodology.

General Overview

PSE is redeveloping the DEA approach for the distributed energy resources portfolio, exploring how to select the best sample of projects for assessment and how to make the analysis most beneficial to Named Communities. PSE seeks early collaboration with the EAG to develop the approach for the analysis.

PSE provided an overview of the component programs. He explained that this portfolio is a group of distributed energy resource (DER) programs with a goal of delivering 80 megawatts of clean energy by the end of 2025. The different program types within the portfolio include:

- **Net Energy Metering:** The oldest DER program, which he noted was not originally designed with equity in mind.
- **Community Solar:** This program allows customers to share in the benefits of a solar project without needing to install panels on their own property. He highlighted that the new legislation (SB 5061) changes the credit from a one-to-one retail value to a market-based one.
- **Solar Grants:** This program provides grants to organizations like nonprofits, community-based organizations, and tribes for their own solar projects. Michael explained that the savings from these grants can be used to support the organization's mission, whether it's for food security, shelter, or cultural sanctuary. He also pointed out that the involvement of EAG members in reviewing these grant applications is a form of equity built into this program.
- **RFP Grid Projects:** These are utility-driven projects that supply energy to the overall grid rather than directly to local customers. While the location of these projects is tracked for equity purposes, they don't provide local energy benefits.

Michael concluded by stating that the goal of the meeting was to co-create a way to assess the benefits and impacts of these programs, acknowledging that PSE was seeking the group's input on how to best evaluate the full 80 MW portfolio.

During the discussion, a member clarified that the majority of the funding for the solar grants comes from voluntary contributions by utility Green Power customers, not primarily from the utility, suggesting this source of funding be more clearly publicly stated. The EAG suggested that the DEA and future efforts should concentrate on the 30% portion of the portfolio, specifically community solar, consisting of community-focused programs. This segment was identified as the most likely to deliver the greatest positive impact for named communities, suggesting that these programs should be considered for expansion while noting that

programs like net metering have a less direct community-level benefits. Finally, the group raised the critical adoption barrier: programs can't benefit those who don't know they exist, especially when they rely on consumer-driven initiation. They reiterated the importance of proactive marketing and putting programs in front of the people who will benefit rather than waiting for them to discover the opportunities.

Public Comment:

There were no public comment submissions.

Next Steps:

Members were reminded to RSVP to the upcoming October 2025 governance retreat.

Adjournment:

The meeting concluded at 7:00 p.m.

Attachment A: Meeting Attendees

Equity Advisory Group members

1. Jenny Harding, GSBA and New Chapter Weddings and Events
2. Elizabeth Vaughn, Sustainable Connections
3. TJ Protho, Community Advocate
4. Dennis Suarez, Community Advocate
5. Megan Walsh, Community Advocate
6. Demeco Walters, Community Advocate
7. Xi Wang, Community Advocate
8. Karia Wong, Chinese Information and Service Center (CISC)
9. Monica Guevara, Emerald Cities Collaborative
10. Marco Morales, Community Advocate
11. Glenda Duldulao, Asian Pacific Cultural Center
12. Amy Nichols, Community Advocate
13. Rachel Gates, Community Advocate

Puget Sound Energy

14. Troy Hutson, Director Energy Equity
15. Michael Wehling, Program Manager-Data Analytics, Energy Equity
16. Leslie Moynihan, Clean Energy Product Manager
17. Heather Mulligan, Manager, Customer Clean Energy Solutions
18. Yvonne Wang, Manager Energy Equity
19. Em Piro, Energy Equity Program Manager – Community Partnerships

Consultant Staff

20. Ishmael Nuñez, Uncommon Bridges
21. Ariam Ford, Uncommon Bridges
22. Carson Bridges, Uncommon Bridges

Guests

23. Charlee Thompson (she/her), Policy Associate, NWEA (part of PSE's LIAC)
24. Jean Marie Dreyer, Public Counsel, Office of Attorney General (part of PSE's LIAC)

Attachment B: Q&A and Feedback Report

Topic	Question/Comment	PSE response
DEA on NEM	The background context is really helpful - thank you	This is good feedback that the level of background and context was useful for the topic and discussion. We will make note that this level of detail and framing was generally effective when developing future presentations.
DEA on NEM	What is the overall capacity of PSEs' generational capacity	As of December 31, 2024, Puget Sound Energy (PSE) had a total electric power capacity of approximately 6,524 megawatts (MW), which includes company-owned and long-term contracted resources. Of this total, approximately 3,339 MW is PSE-owned generating capacity - so basically 1.2% of our current generation portfolio. The 80MW only represents the DER and does not include utility scale clean energy resources which are much larger The NEM included in the "portfolio" is only a portion. The total NEM capacity in place today is over 220 MWs.
DEA on NEM	It is difficult to provide meaningful feedback when the foundation has already happened. Feel grateful to be included in the conversation, but it is challenging to address this issue.	Ishmael acknowledged this feeling. This is a central tension in moving forward with this program.

DEA on NEM	Overall the idea may have been wealthier people get more wealthy. I would love to see the data about the income breakdowns and benefits.	PSE does not collect income data on our customers for privacy reasons. However, we could assess participation against enrollment in the Bill Discount Rate.
DEA on NEM	I am concerned about the benefits being called out since all of the benefits are in the context of our current reality that is structurally built against our named communities. As an example - jobs are being created but for whom.	Thank you for raising this point
DEA on NEM	Benefit is a perspective word and need to differentiate between benefits and disadvantages.	This is a very important distinction, thank you for raising this point. This raises the need to differentiate between community impacts that provide benefits versus those that create disadvantages. We are documenting the need to consider both types of impacts, recognizing that each has different outcomes that should be factored into our analysis. We will explore how to incorporate this distinction in the development of the NEM metrics and in future Equity Analysis conversations.
DEA on NEM	A question I have is how many people living under 80% area median income are benefiting directly? Can we give incentives to landlords for actually providing the services to this group? Along with this, the opportunity for home ownership is limited. This is not accessible to renters.	With regards to the first question, PSE does not collect income data on customers, but we can run a comparison of NEM customers who are also enrolled in Bill Discount Rate as an indicator of income. Regarding renters, PSE launched Community Solar to expand access to this group, among others. In addition, earlier this year, PSE launched the Multi-Occupant Solar program to expand access to benefits. The value of exported energy can be shared across multiple units. PSE has limited incentives available for up to \$250,000 per approved project to reduce the upfront cost of solar. Eligible recipients are Tribal entities and/or affordable housing providers.

DEA on NEM	Overall the idea may have been wealthier people get more wealthy. I would love to see the data about the income breakdowns and benefits.	PSE does not collect income data on our customers for privacy reasons. However, we could assess participation against enrollment in the Bill Discount Rate.
DEA on NEM	So many of the benefits are not equal. Many people of color or low income people can not get access to the high quality jobs in these fields. These jobs are not reaching our neighborhoods.	PSE was highly involved in the process that created the Pacific Northwest Center of Excellence for Clean Energy: Pacific Northwest Center of Excellence for Clean Energy — Washington State Centers of Excellence This center coordinates education programs across the state of Washington aligned with skill standards for career paths into clean energy jobs. There may be resources here connecting access points to NEM and other clean energy jobs and the named neighborhoods and an examination of barriers to access.
DEA on NEM	My interpretation of clean energy equity is that both the costs and benefits of implementing clean energy should be distributed equitably among all stakeholders — including both mainstream and marginalized communities. For this reason, I don't mean we should sugarcoat clean energy implementation by highlighting only the benefits while overlooking the costs. Both benefits and costs should be clearly communicated to everyone. With that being said, I have the following questions, of which, we may already have answers for some of the questions, but not all. They are: Who benefit from the program in the past? Who are missing and what are the challenges? What actions have been identified to address the challenges? What other actions could be taken to address the situation? Knowing that some of the challenges may be unique and some of the challenges may be varied for different populations. Do we have aggregated data for this kind of analysis?	These are great questions to ask that we are hoping to help answer through the DEA.

DEA on NEM	Overall the idea may have been wealthier people get more wealthy. I would love to see the data about the income breakdowns and benefits.	PSE does not collect income data on our customers for privacy reasons. However, we could assess participation against enrollment in the Bill Discount Rate.
	My suggestion for the approach is, answering questions for the big picture and then identify and address specific challenges of each priority community.	
DEA on NEM	I would like to see data to foster this discussion. Data based off of outcomes because the system was designed inequitably.	At PSE we know the participating customers and as we discussed in the previous EAG meeting when we looked at priority populations there are a couple different perspectives we could consider but we focused primarily on income level since we have that at the customer level vs. Block group level.
DEA on NEM	How do we make investments in programs where people can get jobs that get these good jobs	This is a good question, and one PSE will continue to reflect on. PSE is providing funding support to Sphere Solar in support of Clean Energy Interns from disadvantaged communities.
DEA on NEM	Named communities are under acknowledged for the skills we do have! So many people in construction as day laborers have electrical skills but not the necessary certifications to get hired. That's an opportunity for growth in my book.	These are great questions to ask that we are hoping to help answer through the DEA.
DEA on NEM – Mural Response	Do programs like NEM allow orgs/individuals to transition to more efficient technology? (Like create room for electric heat transition from natural gas)	We don't have data, but we hear anecdotally that customers with solar are often motivated to save energy in order to see more benefits from their solar.
DEA on NEM – Mural Response	What benefits and cost of the program such as cost reduction, job creation, for each of marginalized communities? How's different for each community?	This suggestion has been recorded for consideration for the DEA, thank you!
DEA on NEM – Mural Response	Is it possible to establish a competition / prize for figuring out the split incentive issue for landlords considering NEM projects?	The Multi-Occupant Solar projects do include Enhanced Incentives options – thank you for this suggestion.

DEA on NEM	Overall the idea may have been wealthier people get more wealthy. I would love to see the data about the income breakdowns and benefits.	PSE does not collect income data on our customers for privacy reasons. However, we could assess participation against enrollment in the Bill Discount Rate.
DEA on NEM – Mural Response	Only income is highlighted in Green - historically marginalized groups may not be considered low-income anymore but may still benefit from assistance. Can we track and name them?	This suggestion has been recorded for consideration for the DEA, thank you!
DEA on NEM – Mural Response	Is there a way to prioritize solar + battery in named communities?	PSE is exploring how we might bring solar + battery solutions to named communities.
DEA on NEM – Mural Response	How are we incentivizing equity and not just tracking it via metrics?	Some programs offer Enhanced Incentives.
DEA on NEM – Mural Response	Also want to flag that not all jobs are created equal - a solar engineer vs installer vs assistant. # may not capture true economic mobility	This consideration has been recorded for consideration for the DEA, thank you!
DEA on NEM – Mural Response	What's the out-of-pocket cost, if there is any? How affordable is it when comparing to the average income of the marginalized communities in different part of the PSE service area?	Out-of-pocket costs can vary, but the cost-to-return is a central question regarding equity of the NEM program. We will record this for consideration in the DEA, thank you!
DEA: 80 MW Portfolio	Solar grants 2021-2023 have funding sourced from PSE customers	The Solar Grants are funded through Power Program participants. We try and regularly acknowledge their contributions to providing equitable access to solar in press releases, events, and other publicly facing engagement.
DEA: 80 MW Portfolio	Community solar likely has a more positive impact to named communities than net energy metering.	Income Eligible Community Solar is able to pass along energy benefits at no cost to qualified customers.
DEA: 80 MW Portfolio	The customer is asking to be involved in all of these products	There are partnerships, community driven, and utility driven programs

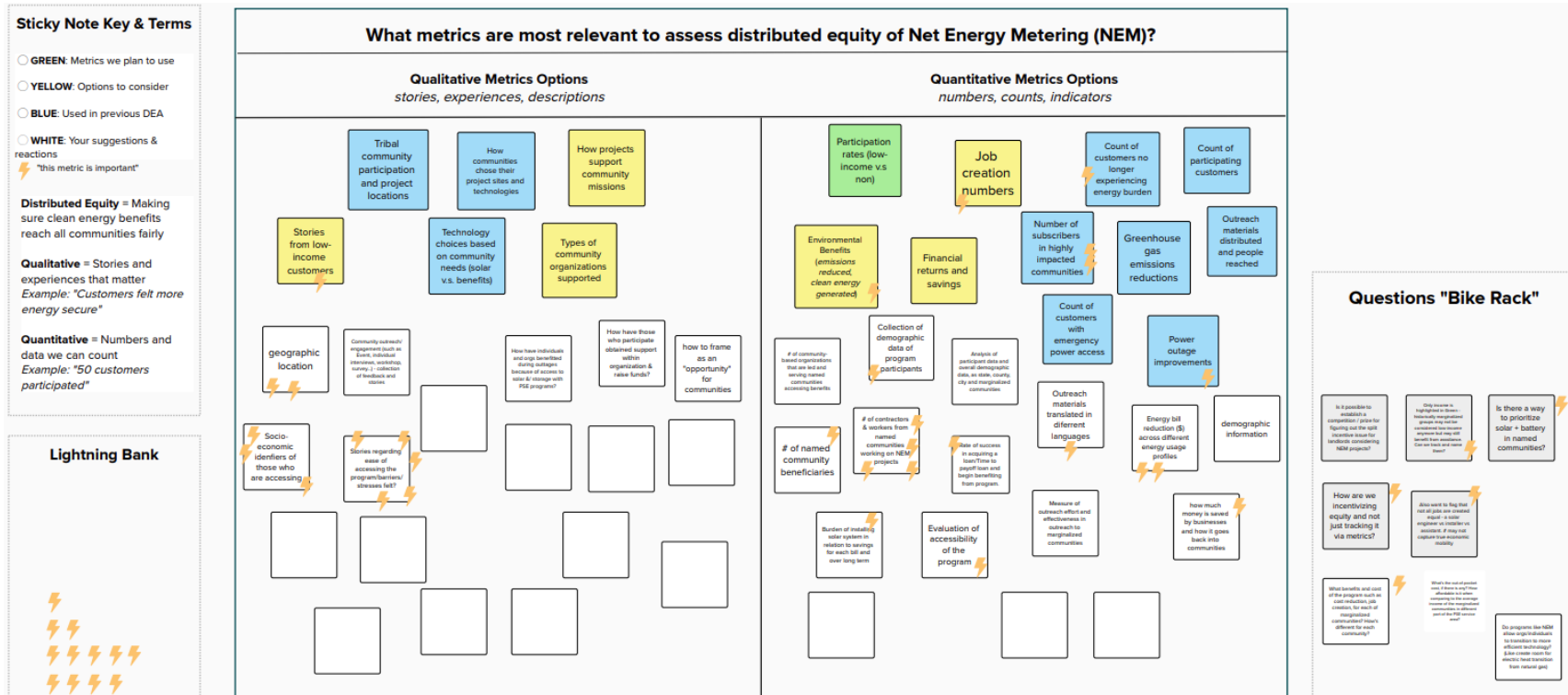
DEA on NEM	Overall the idea may have been wealthier people get more wealthy. I would love to see the data about the income breakdowns and benefits.	PSE does not collect income data on our customers for privacy reasons. However, we could assess participation against enrollment in the Bill Discount Rate.
DEA: 80 MW Portfolio	Customers have to know about these programs	Affirmed that this is an important idea in the programs
DEA: 80 MW Portfolio	What if solar is also a bigger part of the PSE portfolio, beyond what currently exists? And for anything new it gets put into the community portfolio? To increase the percentage as solar grows	PSE is working to expand the Community Solar portfolio, including Income Eligible Community Solar. PSE does access available state funding in order to be able to provide Income Eligible Community Solar benefits at no cost to participants.
DEA: 80 MW Portfolio	I hate to end on this note, but I can't say I totally understand what your question is asking.	We appreciate that you stated this outright – it is important that we understand how the content is landing. We ran short on time for this particular discussion, and that will be considered as we continue to prepare future meetings and evaluate the meeting formats to ensure we have adequate time for feedback and for every member to understand and engage with the topic presented. EAG members are encouraged to follow up on any topic with the Energy Equity Program Manager – Community Partnerships, attend a virtual office hours, or reach out to the presenters to continue the conversation. This particular topic may be revisited at a future meeting.
DEA: 80 MW Portfolio	Communication awareness is a foundational issue with DER projects.	Thank you for the comment. PSE is forming partnerships with community organizations and looking at different ways to communicate with customers of all backgrounds regarding DER projects and programs.
DEA: 80 MW Portfolio	I think there's a good question around- what does get different "programs" in front of different audiences. With individual solar adoption, PSE has not historically marketed this, in part because individual investment required is so large. So the "consumer" driven	Thank you for the comment and question. We don't want to speak for solar companies, or make assumptions about how they are choosing to market their product.

DEA on NEM	Overall the idea may have been wealthier people get more wealthy. I would love to see the data about the income breakdowns and benefits.	PSE does not collect income data on our customers for privacy reasons. However, we could assess participation against enrollment in the Bill Discount Rate.
	program is often "industry" driven. Where do solar companies market their products?	

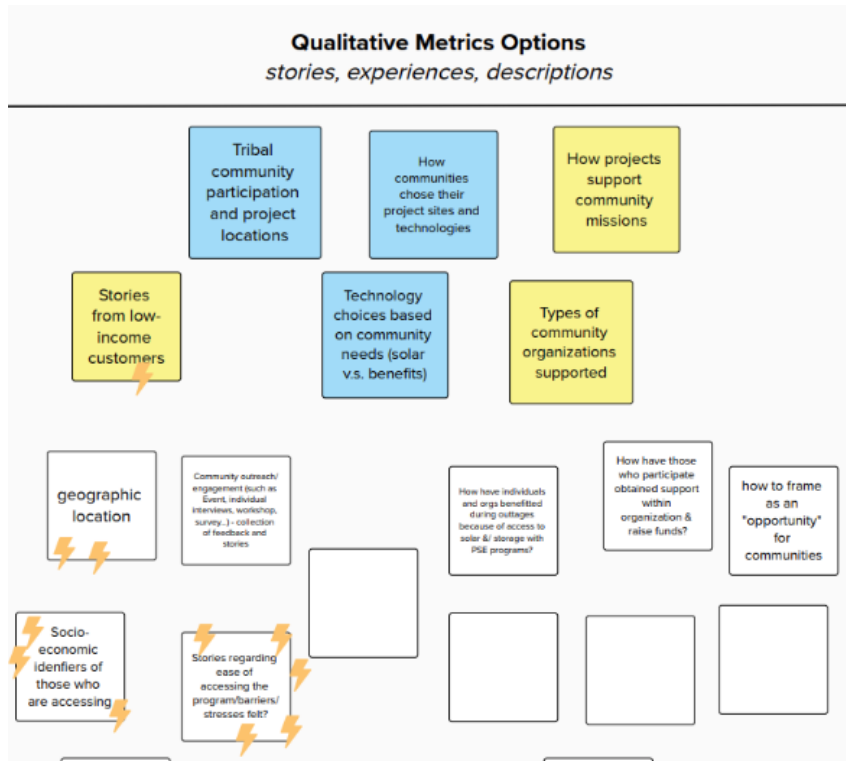
Attachment C:

Interactive Activity: Mural Board on Equity Metrics for NEM

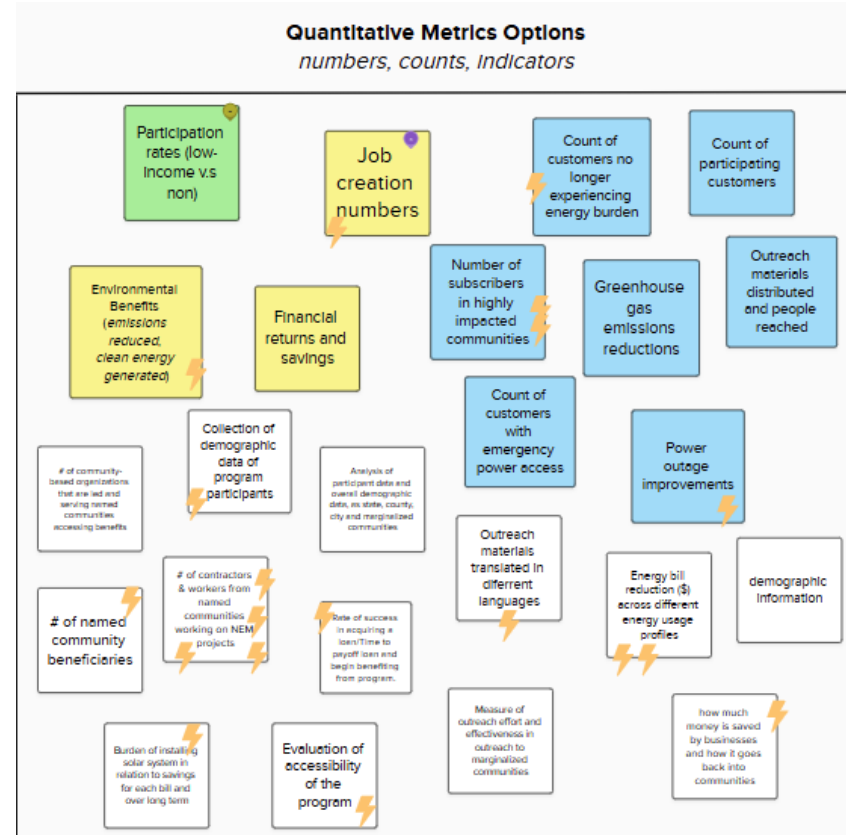
Entire Mural board



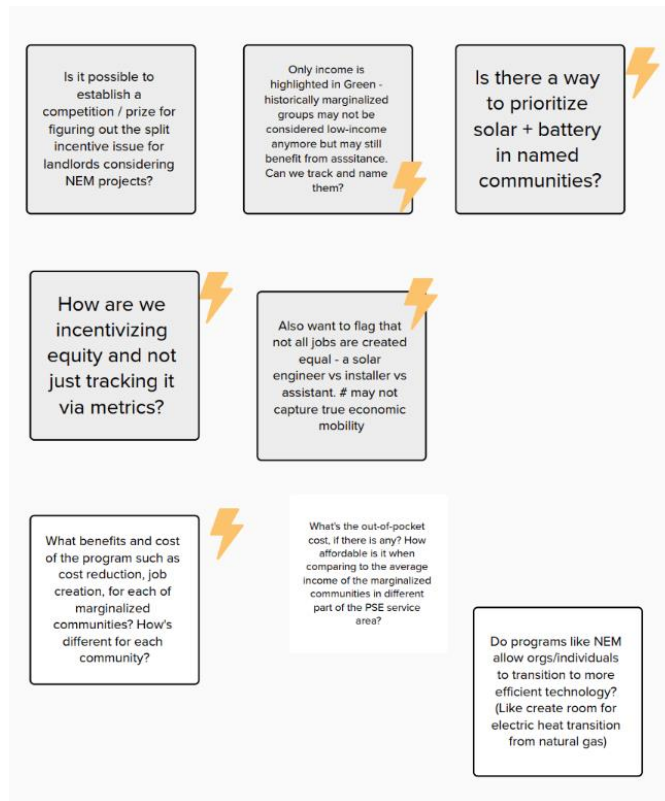
Qualitative Metrics



Quantitative Metrics



“Bike Rack”



- Do programs like NEM allow orgs/individuals to transition to more efficient technology? (Like create room for electric heat transition from natural gas)
- What benefits and cost of the program such as cost reduction, job creation, for each of marginalized communities? How's different for each community?
- Is it possible to establish a competition / prize for figuring out the split incentive issue for landlords considering NEM projects?
- Only income is highlighted in Green - historically marginalized groups may not be considered low-income anymore but may still benefit from assistance. Can we track and name them?
- Is there a way to prioritize solar + battery in named communities?
- How are we incentivizing equity and not just tracking it via metrics?
- Also want to flag that not all jobs are created equal - a solar engineer vs installer vs assistant. # may not capture true economic mobility
- What's the out-of-pocket cost, if there is any? How affordable is it when comparing to the average income of the marginalized communities in different part of the PSE service area?