Good Morning…my Name is Shani Taha
For those of you who don't know me, I've served as one of three Deputy Superintendents at SCL during the Hardy Administration, VP at BPA and most recently as EVP with UCONS.

UCONS is an energy services company that has worked with HRT markets since the early 90s in several states
While UCONS no longer provides direct service to MHs we are serving as an Activist on behalf of a customer class which has no direct representation or participation in statewide or regional forums such as the CRAC.

One of our members, Rob McKenna (former WA State AG), has already submitted a letter to the Power Council asking that service delivery data be submitted and included in MSC1 in the upcoming Plan.

Today, in recognition of the Council's addressing DEI matters, we asking that Equity issues for this customer class which has received far less conservation benefits than the energy bills they have paid during the 7th Power Plan. I think this request has secured the support of NWEC and NRDC.

Manufactured homes encompass a large diverse population of nearly 400,000 ratepayers regionally; this customer class is responsible for nearly 5% of all electric sales regionally, but derives far less than 2% of the region's conservation budget. For those interested in the backup data for this statistic, please let me know.

- Over 90% heated by electricity (natural gas unavailable)
- Average energy consumption > 17,000 kWh (highest use of any residential customer class, regionally)
- 50% of this customer class below federal poverty level guidelines; overall a very low income customer class
- This is a Hard to Reach sector as utility programs don't reach this customer sector, and very few measures have been provided in prior years. BPA, ETO and PSE provided nearly 50% of all conservation programs to this customer class, and yet their programs did not substantially mitigate the continued high energy use of this sector

In closing, we note that Washington Clean Energy Legislation has addressed the matter of Equity for this customer class. But perhaps the clearest illustration of what we wish to share as precedence, comes from California.

Several years ago I was privileged to provide the Calif PUC a similar background on the high bills and low level of utility conservation programs that had historically been provided the nearly 600,000 manufactured home customer in that great state.

The chair of the CPUC recommended that an "**equitable level of utility funding be made to this hard to reach sector, commensurate with the energy bills collected.**" This single decision broke the logjam that had acted to preclude utilities to deliver programs based on:

* Income (all customers in this class were recognized as hard to reach and deserved the same level of conservation services

* Cost effectiveness (many utilities had substituted their avoided costs or avoided cost methodologies) which acted to severely curtail delivery of services to this customer class
* No further customer contribution was mandated from this customer class (which is critical as the vast majority of this class finds themselves on the doorstep of being homeless)

While The Council may not make adopt such sweeping reforms as did Washington (with CETA) and California (in requiring “an EQUITABLE LEVEL of funding), we note that the current barriers to the region acquiring conservation from this customer class require a DIFFERENT approach if we are to succeed. Thank you