

Agenda Date: October 13, 2022
Item Number: A1

Docket: UE-220725

Company Name: Puget Sound Energy
Staff: Jennifer Snyder, Regulatory Analyst – Conservation and Energy Planning
Joel Nightingale, Regulatory Analyst – Conservation and Energy Planning

Recommendation

Issue an Order in Docket UE-220725 and grant the petition filed on September 23, 2022, approving PSE’s recommendation that Bates & White serve as the independent evaluator as outlined in the petition.

On condition that:

Prior to issuing PSE’s other targeted voluntary RFPs in the allotted time period, PSE must consult with stakeholders, including Commission staff (Staff) and Public Counsel, to determine if there are concerns with the use of Bates & White. As part of this consultation, PSE will describe Bates & White’s qualifications in the given area of the potential RFP. If stakeholders identify concerns that the Company does not resolve, stakeholders may petition the Commission in this Docket for approval of an independent evaluator.

Background

On September 23, 2022, Puget Sound Energy (PSE or Company) filed with the Washington Utilities and Transportation Commission (Commission) a Petition for Approval of its recommended independent Evaluator (IE) (Petition), which is required under WAC 480-107-023(2).

PSE asserts that results from its distributed energy resources (DER) request for proposals (RFP) did not include enough solar bids to meet the DER targets set forth in its 2021 Clean Energy Implementation Plan (CEIP). The Company conducted outreach with Staff and other parties about plans to issue a voluntary targeted RFP for solar and solar with storage to fill this gap. PSE is considering filing other targeted voluntary RFPs as needed to meet the targets in its CEIP.

To streamline the process and reduce timelines by avoiding the need to return for Commission approval for each of these potential future RFPs, PSE petitioned for approval of its continued use of Bates & White for the planned solar RFP and any other voluntary targeted RFPs issued before September 30, 2023.

Discussion

Staff has reviewed the filing and recommends approving PSE's request subject to condition that prior to issuing PSE's other targeted voluntary RFPs in the allotted time period, PSE will consult with stakeholders to determine if there are concerns with the use of Bates & White. As part of this consultation, PSE will describe Bates & White's qualifications in the given area of the potential RFP. If stakeholders identify concerns that the Company does not resolve, stakeholders may petition the Commission in this Docket for approval of an independent evaluator.

Throughout PSE's All-source and DER RFP processes, Bates & White appear to have provided a fair and impartial review of the RFP development and bid evaluation processes. Staff has not heard any complaints from stakeholders regarding their work up to this point but did have discussions with Public Counsel regarding notification concerns for future RFPs.

Staff believes that bounding the time period for this IE approval to approximately one year (i.e., for RFPs issued before September 30, 2023) and only for the purposes of voluntary targeted RFPs is in the public interest because it strikes a balance between allowing the Company to move quickly to acquire resources needed to meet its CEIP targets and allowing the Commission to provide oversight and retain approval authority.

Public Counsel notified Staff on October 6, 2022, of their recommendation to include the condition presented in this memo to address concerns that the ongoing approval may limit interested parties' ability to voice possible future concerns. This condition requires PSE to consult with stakeholders, including Commission Staff and Public Counsel, before using Bates & White for future RFPs within this one-year period. If concerns arose from this consultation, stakeholders would be able to petition the Commission in this docket for approval of an IE.

Staff believes this is a useful condition that serves the public interest by allowing stakeholders to initiate a more formal Commission approval process should concerns arise with the continued use of Bates & White as PSE's recommended IE.

Conclusion

Staff recommends approval of PSE's Petition for Approval of its Recommended Independent Evaluator, subject to the condition above.