

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of  
  
PUGET SOUND ENERGY  
  
Petitioner,  
  
Seeking Exemption from the Provisions of  
WAC 480-100-625 Relating to Integrated  
Resource Planning Timing.

DOCKET UE-230966  
  
ORDER 01  
  
GRANTING EXEMPTION FROM  
RULE

**BACKGROUND**

1 On November 22, 2023, Puget Sound Energy (PSE or Company) filed with the Washington Utilities and Transportation Commission (Commission) a petition requesting an exemption from the timing provisions in WAC 480-100-625 (Petition).

2 The Company does not request any waiver from the Commission’s substantive planning requirements but rather a filing date extension. The Company specifically requests to file its 2025 Integrated Resource Plan (IRP) no later than March 31, 2025, rather than January 1, 2025, as is currently required by WAC 480-100-625(1).

3 Adjusting the due date of PSE’s 2025 IRP would have the effect of shifting the Company’s Draft 2025 IRP due date<sup>1</sup> and 2025 IRP Work Plan due date.<sup>2</sup> This would mean that PSE’s Draft 2025 IRP would be due no later than November 30, 2024.

4 Table 1: Current and Requested Filing Timelines

<b>Plan</b>	<b>WAC</b>	<b>Current Due Date</b>	<b>Requested Due Date</b>
IRP	480-100-625(1)	January 1, 2025	March 31, 2025
IRP Work plan	480-100-625(2)	October 1, 2023	December 31, 2023 <sup>3</sup>
IRP Draft	480-100-625(3)	September 1, 2024	November 30, 2024
CEIP	480-100-640(1)	October 1, 2025	October 1, 2025 <sup>4</sup>

<sup>1</sup> Per [WAC 480-100-625\(3\)](#), PSE’s Draft 2025 IRP is due “no later than four months prior to the due date of the final IRP.”

<sup>2</sup> Per [WAC 480-100-625\(2\)](#), PSE’s 2025 IRP Work Plan is due “no later than 15 months prior to the due date of its IRP.”

<sup>3</sup> While the due date of the Company’s 2025 IRP Work Plan would theoretically change, PSE already submitted its 2025 IRP Work Plan on September 29, 2023.

<sup>4</sup> PSE is not requesting any change to its 2025 Clean Energy Implementation Plan file date.

5 On November 29, 2023, Commission Staff (Staff) and PSE met to discuss the petition,  
how it would affect the filing schedule, and the benefits likely to follow if the proposed  
extension was approved.

6 This approximately 3-month extension, PSE argues, would (1) allow more time for public  
and advisory group engagement, (2) create a more functional work product, and (3) allow  
for more integration of the IRP with subsequent related filings.

7 On the first point, Staff agrees that extending the due date of the 2025 IRP would allow  
more time for public engagement and engagement with the Company’s new resource  
planning advisory group (RPAG). PSE states in its Petition that the extension, if  
approved, will allow for at least one more public IRP webinar and one or two more  
RPAG meetings.

8 On the second and third points, Staff agrees that extending the due date of the 2025 IRP  
could allow for a more functional work product and integration with subsequent filings.  
Despite PSE’s initial efforts during the 2023 IRP cycle, there is still significant room for  
improvement in the level of integration between PSE’s gas and electric plans. As a  
condition of its 2022 General Rate Case, PSE is currently in the process of completing a  
decarbonization study, a targeted electrification pilot, and a targeted electrification  
strategy.<sup>5</sup> These deliverables have various interim due dates, but the targeted  
electrification strategy is due as a compliance filing by January 2025 – the same due date  
as is currently required by rule for the 2025 IRP. Extending the file date for PSE’s 2025  
IRP will give the Company time to better integrate this targeted electrification strategy –  
and the decarbonization study and targeted electrification pilot that inform it – into the  
2025 IRP.

9 For the above reasons, Staff believes it is in the public interest to approve this Petition, as  
the additional time is likely to provide significant benefits to both the public process and  
the final product of the 2025 IRP. Staff recommends that the Commission approve this  
Petition as filed, resulting in the file date timeline shifting as outlined in Table 1, above.

## DISCUSSION

10 We agree with Staff’s recommendation. Pursuant WAC 480-07-110, the Commission  
may grant an exemption from or a modification of its rules “if the exemption or

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<sup>5</sup> See *Settlement Stipulation and Agreement on Revenue Requirement and All Other Issues Except Tacoma LNG and PSE’s Green Direct Program*, pg. 35-42, Docket UE-220066, et al., December 22, 2022.

modification is consistent with the public interest, the purposes underlying regulation, and applicable statutes.” This same standard is incorporated in WAC 480-100-008.

11 As the Commission has observed, an electric company has various options available under the current regulatory framework, including requests for exemptions and continuances.<sup>6</sup> We have carefully considered PSE’s request for exemption in this docket and the proposed alternative filing schedule. We agree with Staff that it is reasonable at this time to grant the Company a one-time modification to the deadline for its final 2025 IRP, which has the effect of also shifting the deadline for its draft IRP. We therefore grant the Company’s Petition, pursuant to Staff’s recommendation as set forth in paragraph 9 of this Order.

### FINDINGS AND CONCLUSIONS

- 12 (1) The Commission is an agency of the State of Washington vested by statute with the authority to regulate rates, rules, regulations, practices, accounts, securities, transfers of property and affiliated interests of public service companies, including electric companies.
- 13 (2) Puget Sound Energy is engaged in the business of providing electric services within the state of Washington and is a public service company subject to Commission jurisdiction.
- 14 (3) Puget Sound Energy is subject to WAC 480-100-625(1) which requires electric companies to submit an Integrated Resource Plan (IRP) with Commission by January 1, 2021, and every four years thereafter. WAC 480-100-625(2) requires electric companies to submit an IRP work plan no later than 15 months prior to the due date of its IRP. WAC 480-100-625(3) requires electric companies to file a draft IRP no later than four months prior to the due date of the final IRP.
- 15 (4) Under WAC 480-100-008, the Commission may grant an exemption from the provisions of any rule in WAC 480-100, if consistent with the public interest, the purposes underlying regulation and applicable statutes. See also WAC 480-07-110.

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<sup>6</sup> See *In the Matter of the Clean Energy Implementation Plan filed by Puget Sound Energy*, Docket UE-210795 Final Order 08 ¶¶ 244-45 (June 6, 2023).

- 16 (5) This matter came before the Commission at its regularly scheduled meeting on December 21, 2023.
- 17 (6) After reviewing Puget Sound Energy's Petition filed in Docket UE-230966 on November 22, 2023, and giving due consideration, the Commission finds that the Petition should be granted pursuant to Staff's recommendations as set forth in paragraph 9 of this Order.

**ORDER**

**THE COMMISSION ORDERS:**

- 18 (1) After the effective date of this Order, Puget Sound Energy's Petition is granted, and Puget Sound Energy is granted one-time modifications to the filing deadlines set forth in WAC 480-100-625 as set forth in paragraph 9 of this Order.
- 19 (2) The Commission retains jurisdiction over the subject matter and Puget Sound Energy to effectuate the provisions of this Order.

DATED at Lacey, Washington, and effective December 21, 2023.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

KATHY HUNTER  
Acting Executive Director and Secretary