



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734

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Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Re: *In the matter of Puget Sound Energy's Petition for an Order Extending Filing and Reporting Requirements under RCW 19.405.060 and 19.280.030, an Exemption from the Requirements of WAC 480-90-238(4), 480-100-640(1) & 480-100-655(2), and Requiring the Filing of an Integrated System Plan – Dockets UE-240433 and UG-240434; Supplemental Filing of Puget Sound Energy*

Dear Director Killip,

On June 5, 2024, Puget Sound Energy (PSE) filed with the Washington Utilities and Transportation Commission (Commission) a *Petition for an Order Extending Filing and Reporting Requirements under RCW 19.405.060 and 19.280.030, an Exemption from the Requirements of WAC 480-90-238(4), 480-100-640(1) & 480-100-655(2), and Requiring the Filing of an Integrated System Plan* in the above-referenced dockets (Petition). Following recent discussions with Commission Staff, PSE hereby submits this supplemental filing to formalize two additional commitments related to PSE's Planning Transition Work Plan (Work Plan), included as Attachment A to the Petition.

The Work Plan highlights PSE's progress, achievements, and anticipated next steps for implementing the Clean Energy Transformation Act (CETA) and ensuring all customers benefit from the clean energy transition, consistent with section 3(3) of Engrossed Substitute House Bill 1589 of 2024 (the Large Combination Utilities Decarbonization Act). In addition to the commitments and targets set forth in the Work Plan, below are two additional commitments relating to CETA reporting and compliance and Integrated System Plan (ISP) public engagement.

First, with respect to CETA reporting and compliance, PSE would like to affirm that it plans to submit each of the annual clean energy progress reports and the clean energy compliance report required by WAC 480-100-650. PSE did not seek waivers from these reporting requirements in the Petition, thus PSE remains obligated to submit these reports as applicable during the interim period covered by the Work Plan for 2026 and 2027. PSE recognizes that subsequent reporting requirements related to CETA, the ISP, and other state laws

may change following the Commission’s rulemaking to implement the Large Combination Utilities Decarbonization Act in Docket U-240281.

Second, PSE stated in the Work Plan that it intends to develop a public engagement plan for the ISP that is due January 1, 2027 similar to what PSE has historically developed for integrated resource plans.¹ To provide further clarity regarding this commitment, if the WUTC is able to approve PSE’s petition in this docket by July 11, PSE will engage with its existing advisory groups between July and September 2024 using previously scheduled meetings, as follows:

Advisory Group	Scheduled Meeting Dates
Resource Planning Advisory Group (RPAG)	July 17, 2024 September 11, 2024
Equity Advisory Group (EAG)	September 17, 2024
Conservation Resource Advisory Group (CRAG)	August 7, 2024

PSE will focus these advisory group meetings on introducing the ISP concept and soliciting feedback from advisory group members on topics that each advisory group is best positioned to engage in, as well as recommendations for external engagement more broadly.

PSE will then use the feedback advisory group members provide to prepare and submit an ISP public engagement plan to the Commission not later than October 31, 2024.² The ISP public engagement plan will include, at a minimum, planned engagement activities supporting the development of the ISP through July 1, 2025.³ For engagement that occurs after July 1, 2025, PSE will file an updated ISP public engagement plan no later than 60 days following completion of the Commission’s rulemaking for the ISP. PSE may also update the ISP public engagement plan on an interim basis as necessary, understanding that ISP development will occur, and in many ways, needs to be completed, before final rules are adopted in Docket U-240281.

¹ See § 5 of the Work Plan, included as Attachment A to PSE’s Petition in this docket (stating that “[s]oon after at the Commission approves PSE request to begin work on the 2027 integrated system plan, PSE will develop a public engagement plan, similar to what is required for an integrated resource plan, that will outline engagement efforts related to the 2027 integrated system plan. PSE will continue to engage with advisory groups, including the Resource Planning Advisory Group, the Equity Advisory Group, and the Conservation Resource Advisory Group, on specific topics, such as planning for the 2027 integrated system plan, and those related to system planning, such as, transmission, changes to conservation plans and programs in light of the Large Combination Utilities Decarbonization Act, clean energy and equity targets, and other topics related to CETA.”).

² PSE will also post and maintain the ISP public engagement plan on its website.

³ This timeline is consistent with the end of the Commission’s rulemaking period. See Large Combination Utilities Decarbonization Act at § 3(2) (“[b]y July 1, 2025, the [C]ommission shall complete a rulemaking proceeding to implement consolidated planning requirements for gas and electric services for large combination utilities...”).

Jeff Killip, Executive Director and Secretary

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If the UTC decision is delayed beyond this date, PSE would adjust the public engagement timeline accordingly, dependent upon advisory committee dates and availability. If you have any questions about this filing, please contact me at 425-462-3051.

Sincerely,

/s/ Wendy Gerlitz

Wendy Gerlitz
Director, Regulatory Policy
Puget Sound Energy
PO Box 97034, BEL10W
Bellevue, WA 98009-9734
425-462-3051
Wendy.Gerlitz@pse.com

cc: Jeff Roberson, Assistant Attorney General
Tad O'Neill, Public Counsel