



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

Received
Records Management
Nov 1, 2023

November 1, 2023

Filed via Web Portal

Kathy Hunter
Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

**Re: UE-210795 – Puget Sound Energy’s 2023 Clean Energy Implementation Plan
Biennial CEIP Update**

Dear Executive Director Hunter:

On December 17, 2021, Puget Sound Energy (“PSE”) filed its 2021 Clean Energy Implementation Plan (“2021 CEIP”) in the above-referenced docket. On June 6, 2023, the Washington Utilities and Transportation Commission (“Commission”) issued Final Order 08 (“Order 08”) in this docket approving PSE’s CEIP subject to conditions. Pursuant to WAC 480-100-640, please find PSE’s 2023 Biennial CEIP Update (“Biennial Update”) and attached appendices for filing in this proceeding. The attached Biennial Update is also posted at cleanenergyplan.pse.com and available for download.

The Biennial Update provides proposed changes to the 2021 CEIP and additional information pursuant to the conditions outlined in Order 08. As a result, this first Biennial Update is somewhat detailed and lengthy in scope. This is an expected outcome for the initial stages of transition to complex and in-depth CETA regulations where approaches to CETA planning and implementation are rapidly evolving. PSE will endeavor in future years to move toward producing biennial updates that are more concise and targeted in scope.

In the 2021 CEIP, PSE outlined its initial plans to demonstrate reasonable progress in the period from 2022 through 2025 to meet the Clean Energy Transformation Act (“CETA”) 2030 clean electricity standard by accelerating its clean electricity plans over the next four years. PSE remains on track. This Biennial Update makes minor adjustments to update annual goals and specific targets provided in the 2021 CEIP in response to changing conditions and Order 08 and provides more details on programs, plans and actions throughout the implementation period.

The specific actions laid out in this Biennial Update describe the actions PSE will take to meet its goals and targets over the 2022-2025 CEIP implementation period while maintaining our commitment to providing accessible, reliable and affordable clean energy.

This Biennial Update is enhanced by a robust public participation process and reflects the progress made and lessons learned since the 2021 CEIP. In particular, through collaboration with advisory groups and interested parties in the summer and fall of 2023, PSE developed a methodology for identifying its customers who are in the deepest need, and established an initial minimum designation of 2.5 percent. PSE will strive to meet this minimum designation by the end of the 2022-2025 implementation period but also recognizes that there is a lot of new work to do in this space. Continued conversation and collaboration with advisory groups and interested parties will be important as PSE refines and develops programs to reach our customers with the deepest need. PSE will continue the dialogue with these advisory groups, organizations, and customers throughout the CEIP implementation period on this topic and many others.

While PSE has taken every action to limit the confidential information in this filing, please note that certain information in the enclosed filings is marked as CONFIDENTIAL per WAC 480-07-160. Such CONFIDENTIAL information contains valuable commercial information, including trade secrets or confidential marketing, cost or financial information, of PSE and other entities and, pursuant to RCW 80.04.095, is not subject to inspection or copying under Chapter 42.56 RCW.

If you have any questions about the information contained in this filing, please contact Kara Durbin, Director, Clean Energy Strategy, at (425) 456-2377. If you have any other questions, please contact me.

Sincerely,

/s/ Wendy Gerlitz

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

cc: Lisa Gafken, Public Counsel
Sheree Carson, Perkins Coie

Attachments:
2023 Biennial CEIP Update (pdf)
Appendix A-1: AURORA Modeling Analysis (pdf)
Appendix A-2: AURORA Modeling Output (xlsx)

Appendix A-3: 2022-2023 Actual Generation Data (pdf)

Appendix B: Commission Order 08 Conditions and Status (pdf)

Appendix C: Public Participation (pdf)

Appendix D: RFP Quantitative and Qualitative Analysis (pdf)

Appendix E: Biennial Cost Update (xlsx)

Appendix F: CEIP Programs and Actions Master Table Update (xlsx)

Appendix G: DER Enablement (pdf)

Appendix H: Customer Benefit Indicator Metrics (pdf)

Appendix I: Vulnerable Populations and Deepest Need Methodology (pdf)

Appendix J: ILLUME Memorandum: PSE Equity Assessment Framework (pdf)

Appendix K: Demand Response Additional Information (pdf)

AURORA Models:

23CEIP_HR_NoCETA_Bundle7_Archive (Confidential and Redacted)

23CEIP_HR_NoCETA_Bundle7_SCGHGinDispatch_Archive (Confidential and Redacted)

23CEIP_HR_NoCETA_VaryBundle_Archive (Confidential and Redacted)

23CEIP_HR_NoCETA_VaryBundle_SCGHGinDispatch_Archive (Confidential and Redacted)

23CEIP_HR_Reference_Archive (Confidential and Redacted)

23CEIP_HR_Reference_SCGHGinDispatch_Archive (Confidential and Redacted)

23CEIP_LT_NoCETA_Bundle7_Archive (Confidential and Redacted)

23CEIP_LT_NoCETA_Bundle7_SCGHGinDispatch_Archive (Confidential and Redacted)

23CEIP_LT_NoCETA_VaryBundleB_Archive (Confidential and Redacted)

23CEIP_LT_NoCETA_VaryBundleB_SCGHGinDispatch_Archive (Confidential and Redacted)

23CEIP_LT_Reference_Archive (Confidential and Redacted)

23CEIP_LT_Reference_SCGHGinDispatch_Archive (Confidential and Redacted)