

June 26, 2023

Commissioner David Danner, Chair
Commissioner Ann Rendahl
Commissioner Milt Doumit
Washington Utilities and Transportation Commission (UTC)
P.O. Box 47250
Olympia, WA 98504-7250

Received
Records Management
Jun 26, 2023

RE:

Puget Sound Energy's 2023 Gas Integrated Resource Plan (**Docket UG-220242**)

Puget Sound Energy's 2023 Electric Integrated Resource Plan Progress Report (**Docket UE-200304**)

To the Commissioners:

Thank you for the opportunity to listen to presentations from PSE regarding the proposed 2023 Gas IRP as well as the update report from the Electric IRP. In my initial review of the Gas IRP as well as follow-up questions and comments today, both from you the commissioners and the public, it was apparent there were numerous technical concerns with the Gas IRP which require scrutiny. Thank you for your thoroughness in this important matter.

The PSE Gas IRP is a report prepared and distributed for filing with public officials in the State of Washington. Please ensure that PSE have their reports stamped by the Professional Engineer who prepared or directly supervised the work. This is required by RCW 18.43 and further described by WAC 196-23-020: *Any final document must contain the seal/stamp, signature and date of signature of the licensee who prepared or directly supervised the work.*

Many of the comments and questions raised appear to stem from errors and omissions in the report's content. It is PSE's responsibility to ensure the underlying information in their IRP is as free from errors and omissions as possible. PSE must ensure the technical content in this report is prepared under the direct supervision of a Professional Engineer without undue pressure to favor a particular outcome. The Professional Engineer must attest that the appropriate engineering standard of care was met in formulating the report. Ensuring correct report information and presentation is not supposed to be the job of commissioners, interested parties, attendees, or the general public. With no Professional Engineer identified as responsible for the technical content and with apparent errors and omissions it is my concern that this IRP was not prepared under the direct supervision of a Professional Engineer.

Please set the expectation that all reports prepared and distributed for filing with the UTC are stamped by a Professional Engineer.

Thank you,

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