December 31, 2025

The Honorable Bob Ferguson, Governor of Washington
The Honorable Sarah Bannister, Secretary of the Senate
The Honorable Bernard Dean, Chief Clerk of the House

Re: Summary of the 2025 Winter Preparedness Resource Adequacy Meeting

Dear Governor Ferguson and Members of the State Legislature,

Please find the attached summary of the 2025 winter preparedness resource adequacy meeting held November 4, 2025. This year, in response to public feedback, we expanded our annual resource adequacy meeting under RCW 19.280.065 to three gatherings: one each for summer readiness, long-term resource adequacy, and winter preparedness. The meeting agenda, recording, and presentation materials are available on the Department of Commerce webpage and the Utilities and Transportation Commission webpage.

Winter reliability assessments, presented by regional resource adequacy experts, the North American Electric Reliability Corporation and Western Electricity Coordinating Council, indicate the Northwest's electric grid meets national resource adequacy criteria under normal conditions this winter. Extreme weather poses an elevated risk of short-duration outages absent additional measures, such as utilities following their emergency policies and procedures or firing up their backup generators. The Bonneville Power Administration and Washington utilities do not forecast outages this winter.

At the November 4 meeting, the Bonneville Power Administration and utilities shared the steps they are taking in preparation for the season. This includes daily monitoring of weather conditions, regular calls with reliability coordinators and fuel suppliers, maintenance of the system, and updates to their operations and emergency planning procedures. Utilities reported they have maximized hydro and natural gas storage ahead of winter and ensured facilities are operating properly. Some, such as Seattle City Light and Puget Sound Energy, noted voluntary customer curtailment programs intended to help offset electricity demand if needed.

The meeting highlighted the need for coordination between the natural gas system and the electric system to ensure a reliable energy supply throughout winter. The Northwest Gas Association and Pacific Northwest Utilities Conference Committee discussed collaboration between the electric and gas industries to prepare for winter, as well as broader efforts to bring utility leaders, regulators, state policymakers, power producers, and other stakeholders together, for the purposes of better cross-sector planning and operations. This ensures discussion around

the increased interdependence of gas and electric systems as the region continues its transition to clean energy and state-level climate goals. We appreciate seeing natural gas and electric utilities working together to ensure affordable, reliable, and equitable services for Washington customers.

Preparing for this winter
Washington has already seen some extreme weather as the winter season begins. Utilities can take near-term steps to preserve reliable service in case of extreme weather. These include:

- Ensuring customers' backup generators are in service and ready to be deployed,
- Ensuring the industry's emergency and curtailment plans and procedures are in place, and
- Coordinated planning and response between electric and natural gas systems.

Preparing for future winters
While this meeting focused on readiness for winter 2025-2026, there is a clear need for concerted action to prepare for future winters. Washington law provides utilities with flexibility to use gas-fired generating facilities and, if needed, to expand gas-fired capacity to meet winter peaks. In the meantime, Washington must do more to streamline siting and permitting, add in-state and out-of-state transmission capacity, proactively pursue transmission enhancements and expansions and demand flexibility, and improve resource forecasting for large new loads, such as data centers and advanced manufacturing facilities.

Our energy system is deeply interconnected, and every aspect is vulnerable to extreme weather events fueled by climate change. We remain committed to working with our natural gas and electric utility partners to further our joint efforts to maximize the reliability and affordability of our state's energy system as we decarbonize our economy.

Sincerely,

Brian J. Rybarik
Chair
WA Utilities and Transportation Commission

Jennifer Grove
Assistant Director, Energy Division
WA Department of Commerce

Attachment (1)

2025 Winter Preparedness Adequacy Meeting Summary

Introduction

On November 4, 2025, the Washington Utilities and Transportation Commission (UTC) and the Washington Department of Commerce (Commerce) convened a public meeting to review the adequacy of energy resources to serve the state's electricity and natural gas needs.

We convened this meeting and submit this summary in response to public feedback to expand our annual resource adequacy meeting under RCW 19.280.065 to three annual meetings: one meeting in the spring focused on summer readiness, one meeting in late summer to discuss long-term resource adequacy, and another in late fall to focus on winter preparedness.

RCW 19.280.065(1) says:

> At least once every twelve months, the department and the commission shall jointly convene a meeting of representatives of the investor-owned utilities and consumer-owned utilities, regional planning organizations, transmission operators, and other stakeholders to discuss the current, short-term, and long-term adequacy of energy resources to serve the state's electric needs, and address specific steps the utilities can take to coordinate planning in light of the significant changes to the Northwest's power system including, but not limited to, technological developments, retirements of legacy baseload power generation resources, and changes in laws and regulations affecting power supply options. The department and commission shall provide a summary of these meetings, including any specific action items, to the governor and legislature within sixty days of the meeting.

Maintaining an adequate supply is a core obligation of the utilities that provide energy service to the residents and businesses of Washington. State policy reinforces this obligation as Washington transforms its electric power system and economy, reducing and eventually eliminating emissions from fossil fuel combustion for electricity generation.[1]

The state's 100% clean electricity law, the Clean Energy Transformation Act,[2] includes requirements for utilities to establish specific standards for resource adequacy and incorporate those standards into their planning and compliance.[3] As utilities reduce reliance on coal-fired and gas-fired power plants and add renewable resources such as wind and solar, new approaches and resources will be required to maintain resource adequacy. Utilities must also incorporate equally-important risks associated with fossil generating resources, including fuel supply risk and weather-driven forced outage risk.

While resource adequacy is an obligation of each electric utility serving end-use customers in the state, it also is a shared responsibility of the overall energy system and the entities that operate, plan, regulate, design, and fund that system.

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[1] Washington 2021 State Energy Strategy, page 119-120. https://commerce.wa.gov/energystrategy

[2] Chapter 19.405 RCW.

[3] RCW 19.280.030. This resource planning statute was amended by the CETA legislation to add explicit resource adequacy provisions.

Northwest Gas Association (NWGA)—Gas-Electric Integration and Regional Winter Readiness

NWGA represents the Pacific Northwest gas industry, which includes regional natural gas distribution companies and pipeline operators. Natural gas is used for space and water heating, and process heat for industrial applications. In addition, natural gas is used to generate electricity and, in some cases, provides feedstock for other products.

Natural gas and electric systems operate differently. Electrons move instantly and operate at a frequency and not at a speed. The legacy electric grid had no inherent way to store electricity. Meanwhile, natural gas molecules move at about 25 miles an hour, and the natural gas pipeline serves as inherent storage with the packing and drafting of gas molecules. When the electric system experiences systemwide outages, the system can be restored in segments, with power returning when each segment is energized. By comparison, when the gas system experiences a system outage, the system requires door-to-door service to turn off service, and then again for restoration when gas is flowing again.

Today the Pacific Northwest natural gas pipeline system delivers 33 percent more gas than 25 years ago. The majority of the gas, 75 percent, is weather-dependent, used in the winter and summer months. During winter peaks, gas supplies can supply over 75 percent of the total energy customers use in Oregon and Washington. To ensure the gas system can meet this demand, natural gas utilities and suppliers conduct long-term plans that consider pipeline constraints, contract terms, policies, and local distribution, consumption, and generation analyzed in tandem to determine contract needs.

Many natural gas utilities and suppliers participate in mutual assistance agreements, such as the Northwest Mutual Assistance Agreement (NWMAA), to maintain the natural gas system. NWMAA is a voluntary collaboration among entities that control natural gas assets in the Northwest, primarily focused on enhancing reliability during emergencies, such as by providing neighbors with gas. Many utilities have daily communication between gas suppliers and system operators, conduct simulated emergency scenario simulations, and have some level of generation that can switch to secondary fuel, such as fuel oil. Lastly, members of Reliability Coordinator (RC) West, the California Independent System Operator's electricity reliability coordinator in the western US, convene ahead of winter to prepare for regional cold weather events.

Winter Reliability and Electric-Gas Coordination—North American Electric Reliability Corporation (NERC) and Western Electricity Coordination Council (WECC)

NERC is the Electric Reliability Organization for North America, with a mission to assure the effective reduction of risks to reliability and security of the grid. NERC is subject to oversight by the Federal Energy Regulatory Commission (FERC) and governmental authorities in Canada. WECC is one of six regional entities under NERC that has authority delegated under the Federal Power Act to ensure a reliable and secure bulk power system throughout the Western Interconnection. WECC has the responsibility to create, monitor, and enforce reliability standards and promote activities, such as regional resource adequacy assessments, of the bulk power system in the Western Interconnection.

WECC's Winter Reliability Assessment finds long duration cold snaps are the primary concern for grid reliability in the Northwest, British Columbia, and Alberta. Low temperatures can lead to elevated demand, reduced output from renewable and fossil generation facilities, gas delivery constraints, and unplanned transmission and generation outages. The Pacific Northwest is one of a handful regions that face an elevated risk[4] of operating reserves or energy shortfalls in instances of a regionwide cold snap, in which case the region would need to take additional steps, such as running back-up generators or importing power from other regions, to maintain services.

Utilities in the WECC flagged survey responses to NERC that there should be an increased emphasis on regional gas-electric coordination, stressing the need to continue regional tabletop exercises between gas and electric operators to simulate emergency scenarios and improve readiness. Utilities in the West also reported updating pipeline operation logic and expedited emergency protocols, as well as deployment of limited duration battery energy storage systems to increase capacity on the grid.

Winter Preparedness—PacifiCorp

PacifiCorp is an investor-owned electric utility. It serves 141,000 customers in Washington, and a total of 2.1 million customers across Washington, Oregon, Idaho, California, Utah, and Wyoming.

PacifiCorp's Pacific Northwest service territory is winter-peaking, and its southwest is summer-peaking. Based on National Oceanic and Atmospheric Administration (NOAA) weather forecasts from September 2025, the utility anticipates average temperatures in most of the Northwest in October through December, below average temperatures in most of the Northwest in January through March, and above average temperatures in the Southwest portions of WECC throughout winter. PacifiCorp plans to take advantage of its transmission system and regional generation and load diversity to move energy across its Northwest and Southwest territories to meet its Northwest load this winter.

PacifiCorp's operational planning for winter readiness includes securing and maintaining firm gas transportation and power transmission contracts for its electric generation fleet, improved operational coordination between the generation fleet and the natural gas system, extensive winter scenario modeling, and leveraging storage, flexible resources, and regional markets.

Bonneville Power Administration (BPA)

BPA is obligated under the Pacific Northwest Electric Power Planning and Conservation Act to assure the adequate supply of power to its load-following customers. Those obligations are satisfied through 20-year contracts due to be updated in 2028. Utilities that elect slice or block contracts retain responsibility for their own resource adequacy.

BPA is not forecasting any unusual system outages during this winter and has regular capability to meet load during short-term cold snaps. Long-duration cold snaps would introduce more

[4] Elevated risk is an indication of insufficient operating reserves or energy shortfalls in above-normal peak-day demand or outages.

uncertainty and risk to the reliability of BPA's system. Fish passage constraints are currently uncertain and could impact BPA's ability to respond to extreme weather events in March, but BPA observed that extreme weather events in March are rare.

Seattle City Light (SCL)

SCL delivers electricity to approximately 513,500 customers in Seattle and a handful of surrounding communities. SCL expects this winter to be wetter and cooler with healthier snowpacks; however, these weather patterns could make polar vortex events more likely in mid-to-late winter as the polar jet stream weakens. SCL shared it has outage and water management procedures, and has maximized capacity of its system and conserved its hydro storage for use in peak winter events. The utility practices proactive forward hedging when necessary to ensure resource availability and closely monitors weather forecasts.

SCL also has implemented a new large industrial curtailment program, in which large industrial customers can receive incentives to curtail their load during key events. The events in this program are scheduled a day ahead for a 24-hour period, and there are no limits on the number of times the utility can call for industrial customers to curtail. Incentives for participating are based on the day-ahead market value of electricity.

NW Natural Gas (NWN)

NWN plans for all resources to be available at their maximum output. The utility shared that regional natural gas prices are still highly volatile, and cold weather can lead to infrastructure constraints and higher prices. While national natural gas production reached record highs in 2025, NW Natural Gas noted new liquified natural gas (LNG) export facilities are coming online, driving higher demand. Meanwhile, natural gas use for electric power generation remains high.

Cascade Natural Gas (Cascade)

Cascade shared that at 100 percent demand on its system it can meet approximately 53 percent of peak day needs with its storage resources. Total storage capacity accounts for approximately 14.75 percent of winter demand, and winter demand is approximately 68 percent of its annual demand. It has eight natural gas generation plants behind its system, highlighting the importance of gas and electric coordination efforts.

Avista

Avista reported it has prepared for the winter through diversifying their electric and gas portfolio, grid maintenance, regular winter prep calls with natural gas suppliers, increasing planning reserve margins, internal planning, refueling storage facilities, and participation in mutual assistance check-ins.

Avista participated in a NWGA and Pacific Northwest Utilities Conference Committee (PNUCC) symposium created to discuss gas-electric coordination issues, including a tabletop exercise to practice coordination during key events. The utility highlighted that sustained regional cold

fronts, bulk electric or gas system issues, or regional transfer constraints could lead to high prices for customers.

Avista is continuing to explore multiple winter strategies. These include requesting customers to conserve, diversifying energy supply, conducting full system integrated resource planning, evaluating back up fuel supplies, exploring the need for regional infrastructure, continuing to evolve gas and electric coordination, and participating in regional resource adequacy initiatives and electricity markets.

Puget Sound Energy

Puget Sound Energy serves over 1.2 million electric customers and nearly 900,000 natural gas customers primarily in Western Washington. Winter readiness and energy emergency operations contingency plans span both its gas system and electric system.

On its gas system, PSE has a comprehensive cold weather action plan based on peak morning forecasts. The plan includes its LNG peak shaving plant, compressed natural gas injection sites, bypassing operations at key locations, and interruptible customer curtailment. Gas projects target specific inventories prior to winter peak season and PSE validates power plant readiness through vaporization test runs. Gas emergency contingency plans include participation in the NWMAA, curtailable interruptible loads, requests for customer conservation, and curtailment of firm sales customers through system isolation.

Winter readiness on PSE's electric system begins with resources and capacity contracts established to meet winter planning targets. The utility holds weekly collaborative meetings with PSE meteorologists to ensure early awareness of weather. The Cold Weather Action Plan ensures preparedness for high energy usage days, and electric system and transmission studies ensure reliability. Early and ongoing conservation efforts further reduce peak needs. Electric emergency contingency plans include energy supply monitoring alerts, planning reserve margins, contingency reserve obligations, emergency operations and energy agency plans.

Key **Findings** from Gas-Electric Integration Literature Review and Regional Symposium—NWGA and PNUCC

PNUCC is a not-for-profit trade association of consumer-owned and investor-owned electric utilities and other power industry partners that share a common interest in the efficacy and reliability of the Northwest power system. PNUCC and NWGA shared their gas-electric coordination initiative, which aims to underscore and strengthen collaboration in maintaining a reliable, affordable, and resilient energy future between the electric and gas sectors.

The initiative began with a literature review of regional energy studies, which underscored the need for better coordination between gas and electric systems. To this end, PNUCC, NWGA, Western Power Pool, and the Public Generating Pool convened a symposium of utility leaders, regulators, state policymakers, power producers, and other key stakeholders to discuss key opportunities and challenges. Key themes from the symposium include a need to (1) establish

cross-sector coordination forums to align planning and share data; (2) jointly plan for load growth and peak mitigation, particularly around hybrid systems; (3) integrate models and metrics to stress-test system resilience; and (4) align regulatory frameworks to support long-term, co-optimized planning.