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

June 11, 2019

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Via Web Portal

Mr. Mark L. Johnson, Executive Director and Secretary Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250

Re: Docket UE-171087

Report on 2018 Washington State Investor Owned Utility Energy Efficiency Joint Advisory Group Activities and Outcomes

Dear Mr. Johnson,

Consistent with Commission requirements outlined in Puget Sound Energy's ("PSE's" or "the Company's") 2018-2019 Biennial Conservation Plan ("BCP") Order 01 in Docket UE-171087, PSE submits the attached Report on 2018 Washington State Investor Owned Utility Energy Efficiency Joint Advisory Group Activities and Outcomes (the "Report"). PSE requests that the Report be filed into its BCP Docket.

In Order 01 of the 2018-2019 BCP Docket, the Commission discussed the need for the creation of a statewide, special advisory group to address the issue of how biennial savings, as reported by the Northwest Energy Efficiency Alliance ("NEEA"). Specifically:

"We nevertheless conclude that a special joint advisory group is the most appropriate forum to address these issues in a comprehensive and collaborative manner. Based on the parties' representations, advisory group discussions related to NEEA savings have waned. Whether the conversation has stalled due to disagreement or miscommunication, it is evident that a broader, more in-depth discussion that includes all stakeholders is warranted. By way of guidance for the parties, those discussions should address whether to include the various subsets of NEEA savings, whether the EIA requires that NEEA savings be included in target calculations, consistency with target setting requirements for consumer-owned utilities, and the degree of control the Companies have over NEEA's execution of its programs. We expect those conversations to occur in calendar year 2018. We reserve judgment related to the issue of whether NEEA savings should be included in conservation targets in subsequent biennia pending the joint advisory group's submission of its findings and recommendations."

 $^{^1}$ Order 01, Docket UE-171087, pages 7 and 8, $\P 26.$

Mr. Mark L. Johnson, Executive Director and Secretary Report on 2018 Washington State Investor Owned Utility Energy Efficiency Joint Advisory Group Activities and Outcomes June 11, 2019 Page 2 of 2

The Report satisfies the Commission requirements discussed in the Order. The Report summarizes discussions that the Statewide Advisory Group ("SWAG")² conducted over the course of several meetings in 2018. These meetings addressed the various attributes of how NEEA calculates its electric conservation savings, the influence that IOUs have on NEEA initiatives, and whether or not NEEA savings should be included in the IOUs' respective BCP conservation penalty targets. The Report's Appendices also provide summaries of additional discussions affecting the IOUs and suggested by Commission Staff, including the potential for utility performance incentives and updated cost-effectiveness calculation methodologies.

Consistent with WAC 480-109-110(3), PSE provided an electronic version of the report workbook to SWAG members on May 9, 2019.

For any conservation-related questions, please contact Andy Hemstreet at (425) 424-6918. If you have any other questions, please contact me at (425) 456-2142.

Sincerely,

/s/ Jon Piliaris

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

Attachment: UE-171087-PSE-2018-Statewide-Group-Report-(06-11-2019)

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² The Report lists all of the SWAG participants, which included members of the IOUs' Advisory Groups, Commission Staff, and other state representative stakeholders.