

**Attachment A: Proposed Revisions Orders 08 and 12**

Cite	Requirement
<b>Order 08:</b>	
Paragraph 110; Condition 8	<p>“We therefore require the Company to carry out staff’s proposed consultations, condition 4 [<i>note: actual condition 8</i>], in time to inform its <del>2025 CEIP</del> <u>2027 ISP</u>.”</p> <p>“Condition 8. PSE must work with the equity advisory group and an advisory group (either new or existing) with sufficient expertise and interest to develop a new or revised DER selection process that is (1) consistent with the distributed energy resources planning process outlined in RCW 19.280.100, and (2) transparent, technology neutral, and robust in its comparison of DER programs considering cost and non-cost factors.”</p>
Paragraph 154	<p>“When PSE files its <del>2025 CEIP</del> <u>2027 ISP</u>, we expect the Company to document its efforts to implement procedural justice through engagement with the EAG and other interested parties regarding its methods for designating Vulnerable Populations and to explain the reasons why it disagreed with and did not include pertinent feedback from Front and Centered, NWECC, Staff, Public Counsel, or other interested persons.”</p>
Paragraph 197	<p>“First, we note that PSE and Staff agree on removing the CBI from the CEIP that measures climate change impacts by multiplying the social cost of carbon by reduced greenhouse gas emissions. This CBI should be removed from both the Company’s <del>2025 CEIP</del> <u>2027 ISP</u> and the 2023 Biennial CEIP Update.”</p>
Paragraph 201	<p>“We expect that the Company will present interim targets or goals for at least a portion of its CBIs in its <del>2025 CEIP</del> <u>2027 ISP</u>.”</p>
Paragraph 252	<p>“PSE will be required to carry out the conditions adopted in this Order for the approaching 2023 CEIP Biennial Update and future CEIPs, <del>updating its specific actions and providing a draft 2025 CEIP 2017 ISPs</del>, among other requirements... <del>If PSE fails to comply with WAC 480-100-640 in PSE’s 2025 CEIP filing, however, the Commission will assess penalties.</del>”</p>
Paragraph 304	<p>“...in the Company’s last GRC, the Commission modified the proposal for a Distributional Equity Analysis and indicated that this would be a broad, Commission-led collaborative process. The Company should participate in this process, and we expect the Company to incorporate any pertinent results into its <del>2025 CEIP</del> <u>2027 ISP</u> and its future selection of NWAs.”</p>
Condition 10	<p>“Vulnerable Population Designation Methodology. PSE will modify its designation methodology for Vulnerable Populations for the <del>2025 CEIP</del> <u>2023 Biennial Update</u> as follows and will, starting in 2023, begin</p>

Cite	Requirement
<b>Order 08:</b>	
	<p>gathering any additional data necessary to apply this new designation methodology:</p> <ul style="list-style-type: none"> <li>• Evaluate whether vulnerability factors to assess whether some factors are measuring the same underlying attribute, and consolidate factors where this is the case;</li> <li>• Include as vulnerability factors deep poverty, housing quality, and death and illness from extreme heat;</li> <li>• Consider the synergistic impacts of vulnerability factors that render people with multiple vulnerabilities significantly worse off than people with just one, considering compounding impacts.”</li> </ul>
Condition 17	<p>“For the <del>2025 CEIP</del> <u>2027 ISP</u> PSE must file a draft <del>CEIP</del> <u>ISP</u> on a timeline the Company determines sufficient to incorporate comments on the draft <del>CEIP</del> <u>ISP</u> into the final <del>CEIP</del> <u>2027 ISP</u>. PSE must also file a detailed narrative explaining why specific comments were not incorporated into the final <del>CEIP</del> <u>2027 ISP</u>.”</p>
Condition 23	<p>“PSE must include a narrative in the 2023 Biennial CEIP update and <del>2025 CEIP</del> <u>2027 ISP</u> describing anticipated impacts on customer benefits and burdens from DR programs.”</p>
Condition 29	<p>“PSE will not use the projected incremental cost of compliance as a planning instrument in the <del>2025 CEIP</del> <u>2027 ISP</u>.”</p>
<b>Order 12</b>	
Paragraph 21	<p>“We further agree with Staff that PSE should continue to work with interested persons to identify whether the Company’s definition of deepest need needs to be refined and to set minimum designations of energy benefits to those customers in deepest need that is at least equal to the subset’s proportion of customers in the Company’s <del>2025 CEIP</del> <u>2027 ISP</u>. Doing so will help ensure that benefits are equitably distributed.</p>
Condition 2	<p>“PSE will set a minimum designation of energy benefits to customers in deepest need that is at least equal to that subset’s proportion of electric customers in the Company’s <del>2025 CEIP</del> <u>2027 ISP</u>.”</p>