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December 3, 2020

**Filed Via Web Portal**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**Re: Comments on Clean Energy Transformation Act Interpretations of Use and Stakeholder Proposals  
Dockets UE-191023 and UE-190698**

Dear Mr. Johnson:

Puget Sound Energy (“PSE”) appreciates the opportunity to provide comments to the Washington Utilities and Transportation Commission (“Commission”) in Dockets UE-191023 and UE-190698, in response to the November 5 Notice of Opportunity to File Written Comments (“Notice”) regarding how the different interpretations of “use” and stakeholder proposals for compliance rule language will impact electric utilities in the transition to full compliance with the Clean Energy Transformation Act (“CETA”).

PSE continues to support the Utility Joint Recommendations submitted on September 25, 2020, by the Public Generating Pool, Avista, Pacific Power, and PSE that is included as Attachment A to the Notice. PSE continues to believe that these Utility Joint Recommendations provide a number of benefits, including the following:

- The Utility Joint Recommendations support the goal of CETA to transform Washington’s energy supply;
- The Utility Joint Recommendations enable utilities to fully participate in, and benefit from, electricity markets that will enable further transformation of the energy supply;
- The Utility Joint Recommendations create a nexus between resources acquired by utilities and Washington customers’ energy supply without adopting a “delivery to load” approach;

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- The Utility Joint Recommendations provide an auditable approach to assure no double-counting of clean energy resources; and
- The Utility Joint Recommendations offer a lowest reasonable cost approach for Washington customers, enabling earlier and more investments in clean energy resources.

As an overarching comment, some of the assumptions underlying this set of questions give PSE some pause. PSE strongly supports the goals and objectives of CETA, and it believes its continued participation in organized, multistate regional markets will benefit customers by providing a greater diversity of renewable and non-emitting resources in a timely and cost-effective manner. PSE is wary of any rules and policies that may get too far ahead of regional conversations regarding continued development of the energy imbalance market and the nascent development of an extended day ahead market, as explained further in response to Question 5. While market design will evolve over time, as will state policies, it is unrealistic to assume that a multistate regional market will seamlessly reflect each state's individual policies and that assumptions any state makes today will dictate future market structures across multi-state energy markets. It is important to interpret and implement CETA with this context in mind.

## Questions

- 1. Do the rules provided in Attachment A or B allow CETA to be enforced as an offset program?**
  - a. If no, which portion of the rule language prevents CETA compliance from functioning as an offset program?**
  - b. If yes, which portion of the rule language permits CETA compliance to function as an offset program?**

PSE disagrees with what it understands to be the underlying premise of this question—that CETA could be viewed somehow as an offset program whereby renewable or nonemitting resources procured to comply with CETA leads to an “offset” of emissions elsewhere. CETA is not an emissions offset program. Nothing in CETA explicitly requires that emissions reductions must be demonstrated as a result of energy used for compliance purposes. CETA operates consistent with a netting principle, with the Western Renewable Energy Generation Information System (WREGIS) used to track eligible resources to cover a utility's load to satisfy the standard in RCW 19.405.040 beginning in 2030, and the standard in RCW 19.405.050 beginning in 2045.

While neither the rules in Attachment A nor the rules in Attachment B of the Notice support enforcement of CETA as an offset program, the suggested rules in Attachment B further strip away important flexibility for utilities and would not permit CETA to function consistent with the netting principle described above. Specifically, section 1(b) of the Attachment B rules would require a utility to demonstrate that electricity acquired or generated not be resold over the

multiyear compliance period. Such an accounting is difficult, if not impossible, for a number of reasons, and is inconsistent with the CETA statute.

Furthermore, the difficulties in complying with the suggested rules in Attachment B are compounded by the requirements in section 2(a) that the utility use a tracking mechanism, like NERC e-tags, that documents delivery of renewable resource and non-emitting generation to customers. No such tracking mechanism exists or could exist. Electricity is a fungible commodity that must be instantaneously generated and used. While utilities can readily track inputs to its electric system (i.e., generation), it is not possible to track the path of delivery, as electricity does not flow like a physical commodity or good. Electricity is not a good that can be traced from location to location and be accompanied by a tracking mechanism that identifies the source of the electricity like a bill of lading operates from goods.

Additionally, the requirement in section 2(b) would prohibit a utility from disposing of renewable electricity over a given period that is in excess of the utility's loads without also selling the REC associated with the electricity generated by the utility resources. As discussed in greater detail later, PSE believes that the rules applicable to the period beginning January 1, 2030, and ending December 31, 2044, should recognize the timing dilemma associated with renewable generation in excess of load. Whereas RECs have a "shelf life" and maintain value after generation by renewable resources owned or controlled by a utility,<sup>1</sup> whether through construction or acquisition, the electricity generated by such renewable resources must be instantaneously balanced with load. If the utility's loads are insufficient to balance the electricity generated by its renewable resources, then the utility faces the dilemma of either curtailing generation by its renewable resources or selling the power as unspecified electricity while retaining the RECs for compliance.

The proposed rules in Attachment B to the Notice appear to assume that there exists either a scalable and cost-effective method of storing such electricity for delivery to loads or a centralized market for all electricity. Although it may be possible that either scalable and cost-effective methods of storage or a centralized market may develop over the next decade or two, neither exists at this time and the proposed rule in Attachment B does not allow the utility to retain the REC for purposes of compliance in situations where there is renewable generation in excess of load.

The Joint Utility Recommendations included in Attachment A to the Notice are more consistent with the netting principle for demonstrating compliance with CETA. Specifically, the rules suggested in the Joint Utility Recommendations recognize that utilities must identify compliance with CETA in light of their resource portfolios and the need to instantaneously balance generation and loads. PSE envisions that the rules suggested in the Joint Utility Recommendations in combination with the Commission's proposed CETA reporting

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<sup>1</sup> WREGIS already has a well-established system for tracking the generation source, the vintage, and eventual retirement of the REC to ensure transparency and prevent double-counting.

requirements would require utilities to account for each of the following during a compliance period:

- (i) electricity generated by renewable resources owned or controlled by PSE,
- (ii) electricity generated by non-renewable resources owned or controlled by PSE,
- (iii) purchases of electricity from specified renewable resources;
- (iv) sales of electricity from specified renewable resources;
- (v) purchases of electricity from specified non-renewable resources;
- (vi) sales of electricity from specified non-renewable resources;
- (vii) purchases of unspecified electricity;
- (viii) sales of unspecified electricity; and
- (ix) retail loads served.

Through the netting of each of the categories above, PSE would be able to identify the portion of retail loads served by PSE that would be served by renewable resources.

- 2. Do the rules in Attachment A or B allow a utility to produce renewable electricity in excess of the amount required to serve its load and use the RECs from that excess renewable electricity, sold off system, to cover periods of load in which more than 20 percent of its load is served by GHG emitting resources as a means of complying with RCW 19.405.040(1)(b)(ii)? For example, can a utility comply with the 80 percent requirement through buying 1000 MWh of hydroelectricity in excess of its load service needs in every hour of the day during the spring runoff and resell that power while retaining the nonpower attributes for compliance?**

The suggested rules in Attachment A would allow a utility to produce or procure renewable electricity in excess of the amount required to serve its load during some periods within a four-year compliance period and use the RECs from that excess renewable electricity, sold off system, to cover periods of load during that same compliance period in which more than 20 percent of its load is served by resources that are not renewable or non-emitting resources. This result is a natural consequence of the current inability to store electricity generated by renewable or nonemitting generation sources owned or controlled by the utility—whether hydroelectric generation in the spring, solar generation during mid-day, or wind generation at night—at large scale and in a cost-effective manner.

Ideally, utilities would have the ability to “time shift” the electricity generated by renewable generation in excess of load by storing this “excess electricity” for later delivery to load.

Unfortunately, wide-scale and cost-effective storage options are insufficient to allow utilities to perform this “time shift.” Therefore, the suggested rules in Attachment A would allow utilities to address this timing issue by selling the “excess” electricity generated by renewable or nonemitting generation sources owned or controlled by the utility as unspecified power and retaining the RECs for compliance purposes during periods in which electricity generated by renewable or nonemitting generation sources owned or controlled by utility is less than the utility’s load.

The hypothetical presented regarding a utility buying 1000 MWh of hydroelectricity and reselling the same power while keeping the REC is a fundamentally different proposition than a utility generating more renewable electricity than necessary to meet load during certain periods, selling the electricity as unspecified power, and keeping the REC. In the former, the utility is specifically acquiring renewable energy in excess of its need when prices are low, specifically to retain the REC, and reselling the power as undifferentiated electricity. This type of activity is permissible for compliance pursuant to RCW 19.405.040(1)(b)(ii) but not for compliance with RCW 19.405.040(1)(a). While permissible under RCW 19.405.040(1)(b)(ii), this approach will become increasingly impracticable as renewable portfolio standards increase across the West, as it requires a willing buyer of undifferentiated electricity.

PSE believes that the rules applicable to the period beginning January 1, 2030, and ending December 31, 2044, should recognize the timing dilemma associated with renewable generation in excess of load. This is specifically a problem that organized power markets are working to address, and the Commission can revisit this issue after 2030 in considering what future rules may apply beginning in 2045. Whereas RECs have a “shelf life” and maintain value within a specified period of their generation by renewable resources owned or controlled by a utility, whether through construction or acquisition, the electricity generated by such renewable resources must be instantaneously balanced with load. If the utility’s loads are insufficient to balance the electricity generated by its renewable resources, then the utility faces the dilemma of either curtailing generation by its renewable resources or selling the power as unspecified electricity while retaining the RECs. If the utility has a scalable and cost-effective method of storing the electricity for delivery to loads when its loads exceed the electricity generated by its renewable resources, then it would do so. This situation with selling power as undifferentiated but retaining the RECs should apply towards the requirements of RCW 19.405.040(1)(a).

PSE recognizes that technological advances are being made in storage technologies and that the cost of such technologies has been decreasing. In fact, utility-scale storage other than pumped hydro projects is a relatively new development. With time, these storage technologies may become widely available and cost-effective, thereby mitigating the timing dilemma of needing to balance generation to load. Until such time that storage technologies become sufficiently widespread and cost-effective to mitigate the timing dilemma previously discussed, the rules promulgated by the Commission must allow a utility to sell electricity generated by the utility’s renewable resources that is, in any given moment or hour, in excess of the utility’s load while retaining the REC for CETA compliance. If the Commission were to issue a rule that effectively prohibits a utility from selling electricity generated by the utility’s renewable resources that is in

excess of the utility's load while retaining the REC for CETA compliance, then utilities will have a difficult, if not impossible, challenge to comply with CETA for the foreseeable future.

Finally, development of broader wholesale power markets allow purchases and sales of power across a larger footprint and with more granularity in products, which allows for more efficient balancing of generation and load, integrated variable renewable energy generation resources. Some of these market structures exist today (Energy Imbalance Market) and others are in development today (Day Ahead Markets). The wholesale markets will continue to evolve over the next 25 years, and those markets will require coordination and agreement across multiple states. Rules in Washington State cannot dictate the market structure for the West, which must be determined through the actions of the market participants. Flexibility to allow development of Washington utilities' portfolios to evolve with the markets, which may allow retention of RECs for compliance and sale of the electricity as unspecified power, but not double counting, can provide Washington's utilities access to more integration options and the ability to manage costs of integration for customers.

**3. Attachment A states in (2)(C)(ii)(4) that the delivery of resources used for compliance may occur at “another point of delivery designated by an electric utility for the purpose of subsequent delivery to the utility [emphasis added].”**

**a. Does the term “purpose of subsequent delivery” mean that the electricity must be delivered to the utility, or only that it was intended to be delivered?**

The provision in Attachment A subsection (2)(C)(ii)(4) is meant to cover unique circumstances, like pseudo-ties that might not be otherwise addressed through the other delivery points identified in subsections (2)(C)(ii)(1) – (3). Subsection (2)(C)(ii)(4) allows procurement to occur outside of the utility's service area or balancing authority area, outside the utility's transmission or distribution system, outside of Bonneville Power Administration's transmission system, or outside the system of a participating EIM entity. Compliance could be demonstrated through ownership, control, or contract documentation, as it is under subsections (2)(C)(ii)(1)-(3).

PSE acknowledges that this provision may benefit from further refinement to clarify its meaning and application.

**b. What constitutes “delivery to the utility”?**

Please see PSE's response to part (a) of this question.

**4. How will the suggested rules in Attachment A and B affect long-term portfolio planning and acquisition?**

**a. CETA requires that all of a utility's load be served by renewables or nonemitting resources by 2045. Do the rules in Attachment A or B support this objective? Do they allow compliance with the 2030 goal in a manner that diverges from the 2045 goal?**

The compliance requirements of RCW 19.405.050 applicable to the period beginning January 1, 2045 are distinct from the compliance requirements of RCW 19.405.040 applicable to the period beginning January 1, 2030, and ending December 31, 2044. Whereas RCW 19.405.040(1)(a) requires utilities to achieve and demonstrate compliance over a multiyear period of four years, RCW 19.405.050(1) requires utilities to achieve and demonstrate annual compliance. Whereas RCW 19.405.040(1)(b) permits utilities to achieve and demonstrate compliance for up to twenty percent of its multiyear compliance obligation with an alternative compliance option, RCW 19.405.050 does not permit any alternative compliance option. Given these distinct compliance requirements, the Commission need not adopt rules that attempt to address both. Indeed, it is possible—and hopeful—that technologies could be developed over the next quarter century that make compliance with the greenhouse gas-free compliance standards of RCW 19.405.050 easier for utilities to comply in 2045 than the greenhouse gas-neutral compliance standards of RCW 19.405.040 with which utilities should comply in 2030.

The Notice suggests some potential discomfort that the absence of specific and detailed rules for compliance in 2045 could affect utility’s long-term planning and resources acquisition strategies. PSE can assure the Commission that specific and detailed rules for compliance in 2045 are not necessary to inform PSE’s long-term planning and resources acquisition strategies. PSE understands the obligation imposed upon it by RCW 19.405.050(2), which requires each utility to incorporate the mandate for greenhouse gas-free electricity by 2045 “into all relevant planning and resource acquisition practices including, but not limited to: Resource planning under chapter 19.280 RCW; the construction or acquisition of property, including electric generating facilities; and the provision of electricity service to retail electric customers.”

PSE understands that it must plan and acquire resources over the next quarter century with the compliance requirements of RCW 19.405.050 in mind, but also believes that defining a specific set of rules for 2045 is not necessary, and also may introduce unforeseen risks to customers. For example, if the rules for 2045 were specifically defined now, 25 years ahead of time, utilities would be required to make resource decisions based on those rules that may deny customers access to technology, cost, and market improvements over the next 25 years. PSE understands the mandate and will work to comply but suggests that more pressing and important work must be undertaken to comply with the requirements of RCW 19.405.040, which is now only nine years in the future.

In sum, PSE does not yet know what technologies will become available over the next quarter century to meet this goal or the optimal portfolio that PSE will need to develop using known and undeveloped technologies to comply. Similarly, any rules promulgated by the Commission in 2020 or 2021 for compliance with RCW 19.405.050 will undoubtedly be archaic and subject to further revision before utilities approach compliance with that target. During the legislative conversation leading up to the passage of CETA, it was generally acknowledged by stakeholders that the utilities needed time to “ramp-in” to the 2030 standard, let alone the eventual 100 percent clean energy policy objective in 2045. Therefore, PSE recommends that the Commission promulgate general rules now for compliance with RCW 19.405.050, with an understanding that neither this Commission nor any party to this rulemaking can pretend to know how the electricity

industry will operate and what technologies will be used in 2045. The Commission should focus in the near term on detailed rules for compliance with RCW 19.405.040, which is a more immediate concern, and general rules for compliance with RCW 19.405.050.

- b. Do the suggested rules in Attachment A or B support a long-term resource portfolio plan that matches the production of renewable electricity with the utility’s load and has sufficient transmission service between the point of injection of its planned source of renewable electricity and the utility’s load to enable the renewable electricity to serve that load?**

PSE disagrees with the premise that may be underlying this question—that CETA requires hourly matching of renewable resources to the utility’s load. As the joint utilities indicated in their legal memo provided on July 31, 2020, the plain language of CETA does not require delivery to load, as this interpretation is inconsistent with the provision of multi-year compliance periods through 2044, and annual compliance periods beginning in 2045.

That being said, PSE acknowledges that transmission planning and development is a difficult and complicated process. Transmission planning and development of the scope necessary to make CETA and mandates of other states successful will be of a regional nature, whether a coordinated effort among entities in the Pacific Northwest or among entities in the entire WECC. Regional transmission planning, however, is outside the scope of the jurisdiction of the Commission and this rulemaking. Regional transmission planning is entirely within the jurisdiction of the Federal Energy Regulatory Commission (“FERC”). It is unclear to PSE how the Commission can implement rules that can affect or override FERC requirements for regional transmission planning. At best, the Commission can participate in regional transmission planning and advocate on behalf of the citizens of Washington and the utilities the Commission regulates to ensure that regional transmission planning and development incorporates the transmission necessary to make CETA possible. Additionally, the Commission could also advocate for legislation that allows for more rules and procedures within the state that support more rational, expeditious, and streamlined processes for the development of transmission corridors.

- 5. Could the Energy Imbalance Market (EIM) provide a prorated share of the attributes of the resources that provided energy in a market interval to the loads that received energy in that market interval?**

Organized multistate regional markets such as the CAISO EIM (and the potential EDAM) will benefit Washington electrical companies and their retail customers by providing greater diversity of resources. This diversity of renewable and non-emitting resources will contribute to Washington electrical companies meeting the mandates of CETA in a more timely and cost-effective manner. The effectiveness of any organized market, however, is premised upon clear and consistent rules.

In the absence of national policies on renewables and carbon, the ability to develop clear and consistent rules in organized markets will depend upon the harmonization of public policies from multiple jurisdictions. PSE is wary of rules and policies that may get too far ahead of the nascent

development of an EDAM, and the continued development of the EIM. The Commission and Washington electrical companies that are participating or have an interest in participating in the CAISO organized markets should continue to advocate for market structures and regional policies that accommodate CETA.

That said, the Washington electrical companies that participate in these markets are but a small subset of a much larger regional market, and the Commission should develop rules independent of any assumptions regarding the operations of those markets because they will continue to develop over time. Any rules promulgated by the Commission should similarly be revisited with some frequency to ensure that they are complementary with and not in opposition to any existing or future market structures of rules.

With respect to the question posed above, the approach Washington takes to address procurement and attributes associated with the CAISO EIM—or any other centralized market—should not differ from the approach it takes to any other resource. So long as a utility proves ownership of both the electricity and REC, and the resource is considered deliverable to Washington, the electricity should be eligible for CETA compliance with both RCW 19.405.040 and RCW 19.405.050. The identity of the entity dispatching the eligible resource, whether the utility claiming compliance, CAISO, or any other operator, should not be a material concern for determining CETA compliance. Instead, the focus of concern should be ensuring that double-counting is avoided. The focus should be less on who dispatched the resource and more on whether two or more jurisdictions or compliance mandates are claiming the greenhouse gas-free attributes of the electricity generated.

- a. **If EIM loads were to receive the attributes of the generators providing energy in the market, should constraints in the dynamic transfer capacity be incorporated into the calculation of the distribution of those attributes to load? Is it possible to reflect those constraints in the distribution of attributes to locational loads?**

Please see PSE's response above.

- b. **If EIM loads could receive the attributes of the generators providing energy in the market, is there a means of allocating those attributes by a bid price mechanism?**

Please see PSE's response above.

6. **If the DAM bid awards were mostly surplus hydro, would the loads receiving energy from the DAM only receive unspecified energy under the rules in Attachments A and B? Does this mean that a utility that was a net buyer from the DAM at a time of excess hydroelectric generation would only receive unspecified power?**

Please see PSE's response to Question 5.

**7. Rules in Attachment B, part (2)(b), state that a utility must make a demonstration that the electricity used for compliance was generated by the utility or acquired by the utility with the nonpower attributes and not resold.**

**a. How would a utility make such a demonstration?**

Please see PSE's response to Question 1.

**b. How would power generated and purchased by the utility be identified as sold, which documents would be used, and what process would be followed to reconcile purchases and sales?**

Please see PSE's response to Question 1.

**c. How would Commission staff conduct audits under this proposal?**

PSE is unaware of how Commission staff could conduct audits under the proposal in Attachment B. Over any given period, PSE can account, in the aggregate, for the following:

- (i) electricity generated by renewable resources owned or controlled by PSE,
- (ii) electricity generated by non-renewable resources owned or controlled by PSE,
- (iii) purchases of electricity from specified renewable resources;
- (iv) sales of electricity from specified renewable resources;
- (v) purchases of electricity from specified non-renewable resources;
- (vi) sales of electricity from specified non-renewable resources;
- (vii) purchases of unspecified electricity; and
- (viii) sales of unspecified electricity.

By accounting for all of the following on an aggregate basis, PSE can make a demonstration of the portion of PSE's portfolio represented by renewable resources for the given period, and Commission Staff could audit this information on an aggregated basis. Neither PSE nor Commission Staff could identify or audit how electricity from each source flowed over the given period due to the balancing transactions that PSE must make over that period.

**8. Please explain how double counting is prevented under the suggested rules in Attachment A and B?**

RCW 19.405.040(c) provides the mechanism by which Commission Staff can ensure that double-counting is prevented under the proposed rules in Attachment A or Attachment B—or

any other rules implemented under CETA. Specifically, RCW 19.405.040(c) provides as follows:

Electricity from renewable resources used to meet the standard under [RCW 19.405.040(a)] must be verified by the retirement of renewable energy credits. Renewable energy credits must be tracked and retired in the tracking system selected by the department.

WREGIS ensures that no double-counting has occurred by tracking and retiring RECs and bringing transparency to REC markets. WREGIS, however, does not currently track whether the zero-emissions attributes of the REC has been reported as part of a greenhouse gas program in a regional area. Therefore, either WREGIS will need to undertake enhancements to the products it tracks to ensure and verify that the zero-emissions attribute is not counted twice, or the methodology provided in Attachment A of the proposed rules should be followed, which allows for other means of demonstrating ownership.

Double-counting could occur under California's Cap-and-Trade Program, which requires reporting of emissions characteristics of resources regardless of the disposition of any associated attributes, in the following manner:

- (1) Bilateral specified source contracts between an entity that imports energy into California and a Washington utility, in which the Washington utility resold the power but retains the REC for CETA compliance and the resource's emission rate is used by the importing entity to comply under California's cap-and-trade program.
- (2) EIM Renewable Participating Resources, in which RECs are owned by or sold to a Washington utility and retained for CETA compliance and the electric output of the resource is "deemed delivered" into California and the resource's emission rate is by the importing entity to comply under California's cap-and-trade program.

The potential for double-counting for these transactions could be addressed as follows:

- (1) In the bilateral transaction contract scenario, the utility could make a specified sale to the California entity and exclude the RECs associated with such electricity for CETA compliance.
- (2) In the EIM scenario, the utility would need to prove that the electricity has not been "deemed" to be delivered into California to prevent double-counting.

The Joint Utility Recommendations in Attachment A attempt to address these situations by including the following language to address double-counting:

Nonpower attributes used to satisfy compliance with RCW 19.405.040(1)(a)(ii) may not be double counted. If a utility claiming a renewable resource or nonemitting generation as provided in subsection (1) sells or transfers ownership of the electricity in a transaction that contractually specifies the generation source, it may not use the nonpower attributes associated with that specified-source sale of electricity for compliance with RCW 19.405.040(1)(a)(ii).

From PSE's perspective, the rule suggested in the Joint Utility Recommendations in Attachment A addresses the spirit and intent of CETA with respect to double-counting. The methods to ensure that double-counting does not occur, however, would be better addressed through work with other states and CAISO to develop a common understanding of double-counting concerns and the tools and products that would provide greater transparency regarding greenhouse gas emissions attributes.

### **Conclusion**

PSE appreciates the opportunity to submit these comments for the Commission's consideration. Such an important and complex topic will benefit from continued conversation over the next few months with stakeholders, members of the Markets Work Group, the Department of Commerce, and others. PSE looks forward to collaboratively finding a solution that meets the goals of CETA while also supporting the efficient operation of energy markets. PSE encourages the Commission to continue this conversation with stakeholders over the next few months to work towards achieving this objective.

PSE appreciates the opportunity to provide comments in response to the Commission's Notice. Please contact Kara Durbin at 425-456-2377 with questions or to seek additional information about these comments. If you have any other questions please contact me at (425) 456-2142.

Sincerely,

*/s/ Jon Piliaris*

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