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Electronically Filed

Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Received
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Sep 27, 2024

**Re: In the Matter of Puget Sound Energy's Petition to Amend Orders 08 and 12 and Adjust PSE's Clean Energy Implementation Plan Annual Interim Targets for 2024 and 2025
Docket UE-210795**

Dear Director Killip:

Enclosed for filing is the *Petition of Puget Sound Energy to Amend Orders 08 and 12 and Adjust PSE's Clean Energy Implementation Plan Annual Interim Targets for 2024 and 2025* (the Petition). Puget Sound Energy ("PSE") is filing this Petition pursuant to Washington Administrative Code ("WAC") 480-07-370, 480-07-875, and 480-09-870(1).

Revised Code of Washington (RCW) 19.405, Washington's Clean Energy Transformation Act (CETA), as implemented by WAC 480-100-640(1), requires electric investor-owned utilities such as PSE to develop a clean energy implementation plan (CEIP) every four years. The CEIP describes a utility's plan for making progress toward meeting the clean energy transformation standards in CETA, including that all retail sales of electricity be greenhouse gas neutral by 2030,¹ and that by January 1, 2045, 100 percent of all electricity sales to Washington customers are supplied by either non-emitting or renewable electricity generation resources.² Each electric investor-owned utility must also make a biennial CEIP update filing on or before November 1st of each odd-numbered year the utility does not file a CEIP.³ Each CEIP and biennial CEIP update must include interim targets in the form of the percent of forecasted retail sales of electricity supplied by non-emitting and renewable resources prior to 2030 and from 2030 through 2045.⁴

The Commission previously approved PSE's CEIP annual interim targets for 2024 and 2025 in Order 08 approving PSE's 2021 CEIP and in Order 12 approving PSE's 2023 Biennial Update. The pathway for meeting PSE's annual interim targets for 2024 and 2025 has become much

¹ RCW 19.405.040(1).

² RCW 19.405.050(1).

³ WAC 480-100-640(11); in accordance with Order 01 in Docket No. UG-240434, the CEIP PSE would have filed in 2025 will be filed in 2027 as part of an Integrated System Plan.

⁴ WAC 480-100-640(2)

more challenging since PSE filed its Biennial Update. Attempting to achieve the existing CEIP annual targets for 2024 and 2025 is not feasible without making short-term clean energy market purchases at an estimated additional cost of over \$200 million to PSE's customers. These purchases do not add new long-term clean energy resources to the grid or result in emission reductions as intended by CETA and their costs are not a good value for customers. In addition, the Commission expressed concerns about unreasonable costs and the potential of meeting targets with short-term clean energy resources when it considered PSE's Biennial Update.⁵ Although PSE is committed to, and making reasonable progress toward, meeting the 2030 and 2045 long-term CETA standards, PSE is requesting an order adjusting its CEIP annual interim targets for 2024 and 2025 to avoid making short-term clean energy purchases at a significant cost to customers.

PSE respectfully requests that this matter be taken up and a decision granting the Petition be issued at the Open Meeting scheduled for November 7. Granting the Petition in early November is critical for PSE to have certainty regarding its approved CETA targets for 2024 and 2025, which will inform where to invest dollars on CETA-compliant resources, on additional short-term market purchases that do not provide lasting value to customers, or on long-term resources that will help PSE achieve the 2030 and 2045 CETA standards in RCW 19.405.040(1) and 19.405.050(1). Granting the Petition would also avoid imposing unreasonable costs on PSE's customers and is in the public interest.

Included with this filing are the following documents:

- The Petition;
- Attachment A: Declaration of Joshua J. Jacobs in Support of Adjusting PSE's CEIP Annual Interim Targets for 2024 and 2025; and
- Certificate of Service

If you have any questions, please contact me at 425-635-1417.

Sincerely,



Pamela J. Anderson

Enclosures

cc: All Parties

⁵ See Condition 1 in Order 12.