

November 5, 2024

Kathy Hunter  
Acting Executive Director and Secretary  
Washington Utilities and Transportation Commission  
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Olympia, WA 98504-7250

**Comments on Behalf of Third Act Washington on Puget Sound Energy's Petition to Lower Clean Energy Targets for 2024 and 2025 (Docket UE-210795)**

Ms. Hunter,

PSE's petition should not be granted unless it includes a credible plan to recover from its failure to meet its interim clean energy targets. The petition does not include such a plan. It cites a listing of PSE's past efforts to obtain clean energy as evidence of reasonable progress. But those efforts have failed – how will they be improved?

In paragraph 19 of its petition, PSE says that "...the 2021 CEIP was the first time PSE used generic resources as part of its long-range planning tools to develop near-term targets and plans." PSE says that its modeling "...relied on hypothetical – not actual, known resources – and their estimated costs. It also relied on 80-year historical resource performance of fuel-limited resources such as hydro under median water conditions, which increasingly overstates the actual resource performance in some years."

Rather than relying on hypothetical, generic resources, PSE should launch an aggressive assessment of the regional potential for developing *new* clean energy resources to inform its scenario planning process. PSE should also accelerate programs to implement demand response, electric vehicle-to-grid, storage batteries, distributed energy sources, virtual power plants, and time-of-use rates. PSE has only begun token pilot projects for some of these resources, while other utilities in the U.S. have full-scale systems in place.

PSE argues in paragraph 11 of its petition that it's not clear where the "tipping point" is at which short-term energy costs become unreasonable. But the way to avoid this problem is to improve planning for long-term resources in order to minimize reliance on short-term resources. Short-term costs are known to be subject to market forces that push them higher. PSE must take adequate steps in planning to prevent over-reliance on short-term resource costs, which are inherently volatile.

We ask that you require PSE to provide a credible plan to meet its clean energy goals before considering its petition. The choice PSE offers – inadequate clean energy progress vs. exorbitant short-term energy costs – was not inevitable and is not acceptable.

Tom Kraemer  
Third Act Washington