



February 1, 2024

Kathy Hunter, Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
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RE: Docket UE-231031 (Advice No. 2023-60) Puget Sound Energy's Electric Tariff Revision

I am writing to express my full endorsement of PSE's revised tariff filing dated January 18, 2024. The proposed extension of Schedule 150 aims to temporarily maintain the current regulatory status until a thorough Value of Distributed Solar and Storage study can be conducted. This study will serve as a guiding principle for future endeavors in determining a fair and just successor to the existing net metering tariff.

To emphasize the valid basis for my request, I want to point out that RCW 80.60 establishes a minimum requirement for net metering of "four percent of the utility's highest demand in 1996." This requirement must not be misconstrued as a maximum limit. A number of utilities have already exceeded the 4% threshold without violating RCW 80.60. PSE is not obligated to end this tariff at any point, and the Commission is under no obligation to discontinue net-metering for any of the utilities it oversees once they reach this threshold.

I would like to highlight the following points as well:

- PSE is collaborating with the solar industry and other stakeholders to ensure a comprehensive approach.
- Numerous utilities, stakeholders, and legislators are in widespread agreement and endorse the idea that conducting a thorough study on the Value of Distributed Solar and Storage is the most effective way to establish a fair and unbiased replacement for the current net metering tariff.
- Substantial progress has been made in securing the necessary funding for the study, which will be conducted by the Washington State Academy of Sciences.
- It is of utmost importance to maintain the current structure for net-metered solar power without any changes until the study is completed. This is crucial to avoid any negative impact on consumers and to ensure uninterrupted operations for local solar companies like mine, and their associated industries until a new rate system is implemented.
- RCW 80.60 establishes a minimum obligation for net metering, rather than a limitation.
- Unlike the hurried, deficient and partisan process funded in 2023 by a utility consortium using the firm E3, PSE has demonstrated a responsible, cooperative, and progressive approach in their quest to identify an optimal replacement tariff that addresses concerns of fairness and equity.

For these reasons I respectfully petition you to approve PSE's temporary filing to extend Net Metering Schedule 150.

Respectfully,

Alana Nelson
Business & Administrative Manager