

INTEGRATED SYSTEM PLAN RULES (480-95 WAC)

WAC 480-95-010 Purpose.

The purpose of these rules is to ensure that a large combination utility meets the clean energy transformation standards ~~outlined in WAC 480-100-610~~ RCW 19.405.040 and 19.405.050 and the requirements of Chapter 80.86 RCW in a timely manner and at the lowest reasonable cost. Pursuant to RCW 80.86.020(2)(a), the commission consolidates the planning requirements of electric integrated resource plans, gas integrated resource plans, ~~electrification of transportation plans~~, and clean energy implementation plans into an integrated system plan. ~~The Commission may also consolidate transportation electrification planning requirements into the integrated system plan.~~ The statutorily required contents of any plan consolidated into an integrated system plan must be met by the integrated system plan. Due to the requirements listed in this chapter, large combination utilities are exempt from the following sections of the WAC: 480-100-620 (Content of an integrated resource plan), 480-100-625 (Integrated resource plan development and timing), 480-100-630 (Integrated resource planning advisory groups), 480-100-640(11) (Biennial CEIP update), 480-100-645 (Process for review of CEIP and updates), 480-100-655 (Public participation in a CEIP), 480-109-210 (Renewable portfolio standard reporting), and 480-90-238 (Gas integrated resource planning).

Commented [PSE1]: Preferable to reference RCW.

Commented [PSE2]: PSE requests that this be optional, for future consideration beyond the first ISP. See our comments for more details.

Commented [PSE3]: As described in written comments, PSE is recommending being subject to select CETA related WAC sections. This is the list of sections PSE recommends being wholly replaced with content in these ISP rules.

WAC 480-95-020 Definitions.

The definitions below apply to all of Chapter 480-95 WAC.

- (1) "Alternative lowest reasonable cost and reasonably available portfolio" means, for purposes of calculating the incremental cost of compliance in RCW 19.405.060(3), the portfolio of investments the large combination utility would have made and the expenses the large combination utility would have incurred if not for the requirement to comply with RCW 19.405.040 and 19.405.050. The alternative lowest reasonable cost and reasonably available portfolio must include the social cost of greenhouse gases ~~in the resource acquisition decision in accordance with RCW 19.280.030 (3)(a).~~
- (2) "Carbon dioxide equivalent" or "CO2e" means a metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.
- (3) "Clean Energy Action Plan" or "CEAP" means the plan identified in RCW 19.280.030(2).
- (4) "Clean Energy Implementation Plan" or "CEIP" means the plan identified in RCW 19.405.060(1).
- (5) ~~"Commercially-Technically feasible"~~ "Commercially feasible" ~~has the following meaning when applied to the conservation, energy efficiency, and demand response targets in RCW 80.86.020(4).~~ has the following meaning when applied to the conservation, energy efficiency, and demand response targets in RCW 80.86.020(4). For the purpose of long-term planning, the technically achievable potential is calculated in a conservation or demand response potential assessment. Responses to a request for information and request for proposal process designed to identify all technically feasible conservation and efficiency resources, demand response and demand flexibility may be used to demonstrate ~~technical/commercial~~ feasibility during an emissions reduction period.
- (6) "Commercially feasible" has the following meaning when applied to the conservation, energy efficiency, and demand response targets in RCW 80.86.020(4). The amount of conservation and demand response that can be acquired in a cost-effective manner as defined by WAC 194.37.070 and as identified by the utility, based on information gathered from sources such as pilots, evaluated program results and vendors in request for information and request for

Commented [PSE4]: The ISP does not make resource acquisition decisions. Further, because this is a gas and electric integrated plan pursuant to RCW 80.86 it does not make sense to refer to the electric IRP statute in this broad context. The meaning and substance is clear without these additions.

proposal processes.

- ~~(6)~~(7) "Commercially available" means that a resource is currently available for purchase, or is reasonably anticipated to be available within the integrated system plan's study-implementation period, to be put into commercial operation supporting utility service.
- ~~(7)~~(8) "Commission" means the Washington utilities and transportation commission.
- ~~(8)~~(9) "Conservation and efficiency resources" means any reduction in electric or natural gas consumption that results from increases in the efficiency of energy use, production, transmission, transportation, or distribution.
- ~~(9)~~(10) "Cost-effective" means that a project or resource is, or is forecast to: (a) Be reliable and available within the time it is needed; and (b) reduce greenhouse gas emissions and meet or reduce the energy demand or supply an equivalent level of energy service to the intended customers at an estimated long-term incremental system cost no greater than that of the least-cost similarly reliable and available alternative project or resource, or any combination thereof, including the cost of compliance with chapter 70A.65 RCW, based on the forward allowance ceiling price of allowances approved by the department of ecology under RCW 70A.65.160.
- ~~(10)~~(11) "Customer benefit indicator" means an attribute, either quantitative or qualitative, of resources or related distribution investments associated with customer benefits described in RCW 19.405.040(8).
- ~~(11)~~(12) "Delivery system" includes any power line, pipe, equipment, apparatus, mechanism, machinery, instrument, or ancillary facility used by a large combination utility to deliver electricity or gas for ultimate consumption by a customer of the large combination utility.
- ~~(12)~~(13) "Demand response" means changes in electric or natural gas usage by demand-side resources from their normal consumption patterns in response to changes in the price of electricity or natural gas service, or to incentive payments designed to induce lower electricity or natural gas use, at times of high wholesale market prices or when system reliability is jeopardized. Demand response may include measures to increase or decrease electricity production on the customer's side of the meter in response to incentive payments or messaging.
- ~~(13)~~(14) "Demand flexibility" means the capacity of demand-side loads to change their consumption patterns hourly or on another timescale.
- ~~(14)~~(15) "Distributed energy resource" means a nonemitting electric generation or renewable resource or program that reduces electric demand, manages the level or timing of electricity consumption, or provides storage, electric energy, capacity, or ancillary services to a large combination utility and that is located on the distribution system, any sub-system of the distribution system, or behind the customer meter, including conservation and energy efficiency.
- ~~(15)~~(16) "Electrical company" has the same meaning as provided in RCW 80.04.010.
- ~~(16)~~(17)
- (a) "Electrification" means the installation of energy efficient electric end-use equipment.
- (b) Electrification programs may include weatherization and conservation and efficiency measures.
- ~~(17)~~(18) "Emissions baseline" means the actual cumulative greenhouse gas emissions of a large combination utility, calculated pursuant to chapter 70A.65 RCW, for the five-year period beginning January 1, 2015, and ending December 31, 2019.
- ~~(18)~~(19) "Emissions reduction period" means one of five periods of five calendar years each, with

Commented [PSE5]: PSE is uncertain whether "commercial operation" would be applicable to certain resources, such as energy efficiency measures installed by a customer.

- the five periods beginning on January 1st of calendar years 2030, 2035, 2040, 2045, and 2050, respectively.
- ~~(19)~~(20) "Emissions reduction target" means a targeted reduction of projected cumulative greenhouse gas emissions of a large combination utility approved by the commission for an emissions reduction period that is at least as stringent as the limits established in RCW 70A.45.020.
- ~~(20)~~(21) "Energy assistance" means a program undertaken by a large combination utility to reduce the household energy burden of its customers.
- (a) Energy assistance includes, but is not limited to, weatherization, conservation and efficiency services, and monetary assistance, such as a grant program or discounts for lower income households, intended to lower a household's energy burden.
- (b) Energy assistance may include direct customer ownership in distributed energy resources or other strategies if such strategies achieve a reduction in energy burden for the customer above other available conservation and demand-side measures.
- ~~(21)~~(22) "Energy assistance need" means the amount of assistance necessary to achieve an energy burden equal to six percent for large combination utility customers.
- ~~(22)~~(23) "Energy burden" means the share of annual household income used to pay annual home energy bills.
- ~~(23)~~(24) "Equitable distribution" means a fair and just, but not necessarily equal, allocation of benefits and burdens from the large combination utility's transition to clean energy. Equitable distribution is based on disparities in current conditions. Current conditions are informed by, among other things, the assessment described in RCW 19.280.030 (1)(k) from the most recent integrated resource plan.
- ~~(24)~~(25) "Gas company" has the same meaning as provided in RCW 80.04.010.
- ~~(25)~~(26) "Greenhouse gas" has the same meaning as provided in RCW 70A.45.010.
- ~~(26)~~(27) "Highly impacted community" has the same meaning as provided in RCW 19.405.020.
- ~~(27)~~ "Integrated resource plan" or "IRP" means an analysis describing the mix of generating resources, conservation, methods, technologies, and resources to integrate renewable resources and, where applicable, address overgeneration events, and efficiency resources that will meet current and projected needs at the lowest reasonable cost to the utility and its ratepayers and that complies with the requirements specified in RCW 19.280.030(1).
- (28) "Integrated system plan" or "ISP" means a plan that the commission may approve, reject, or approve with conditions pursuant to RCW 80.86.020.
- (29) "Implementation period" means the ~~four years period specified in after the filing of each integrated system plan, except for the first integrated system plan which begins after the approval by the Commission of the integrated system plan. The implementation period for the first integrated system plan will be January 1, 2027, through December 31, 2029. The implementation period for the second integrated system plan will be January 1, 2030, through December 31, 2033.~~
- (30) "Large combination utility" means a public service company that is both an electrical company and a gas company that serves more than 800,000 retail electric customers and 500,000 retail gas customers in the state of Washington as of June 30, 2024.
- (31) "Low-income" has the same meaning as provided in ~~WAC 480-109-060(22)~~ RCW 19.405.020(4).
- ~~(32)~~ "Lowest reasonable cost" ~~has the same meaning as provided in RCW 80.86.010. means the lowest cost mix of demand-side and supply-side resources and decarbonization measures determined through a detailed and consistent analysis of a wide range of commercially~~

Commented [PSE6]: Definition not needed.

Commented [PSE7]: Recommend not putting specific dates in the rules. This creates more flexibility to determine implementation periods appropriate to the circumstances of each plan.

Commented [PSE8]: Suggest keeping definitions consistent with the statute.

~~available resources and measures. At a minimum, this analysis must consider long-term costs and benefits, market volatility risks, resource uncertainties, resource dispatchability, resource effect on system operation, the risks imposed on the large combination utility and its ratepayers, public policies regarding resource preference adopted by Washington state or the federal government, the cost of risks associated with environmental effects including potential spills and emissions of carbon dioxide, and the need for security of supply. The analysis of the lowest reasonable cost must describe the large combination utility's combination of planned resources and related delivery system infrastructure in compliance with chapters 19.280, 19.285, and 19.405 RCW.~~

- ~~(33)~~(32) "Named communities" means all communities identified as a highly impacted community, vulnerable population, or an overburdened community.
- ~~(34)~~(33) "Natural gas" has the same meaning as provided in RCW 19.405.020.
- ~~(35)~~(34) "Nonemitting electric generation" has the same meaning as provided in RCW 19.405.020.
- ~~(36)~~(35) "Nonpipeline alternative" means activities or investments that delay, reduce, or avoid the need to build, upgrade, or repair gas plant, such as pipelines or service lines.
- ~~(37)~~(36) "Nonwires solution" means activities or investments that delay, reduce, or avoid the need to build or upgrade components of a distribution system, transmission system, or both.
- ~~(38)~~(37) "Nonpower attributes" means all environmentally related characteristics, exclusive of energy, capacity reliability, and other electrical power service attributes, that are associated with the generation of electricity including, but not limited to, the facility's fuel type, geographic location, vintage, qualification as a renewable resource, and avoided emissions of pollutants to the air, soil, or water, and avoided emissions of carbon dioxide and other greenhouse gases. Nonpower attributes does not include any aspects, claims, characteristics, and benefits associated with the on-site capture and destruction of methane or other greenhouse gases at a facility through a digester system, landfill gas collection system, or other mechanism, which may be separately marketable as greenhouse gas emission reduction credits, offsets, or similar tradable commodities. However, these separate avoided emissions may not result in or otherwise have the effect of attributing greenhouse gas emissions to the electricity.
- ~~(39)~~(38) "Overburdened community" has the same meaning as provided in RCW 70A.65.010.
- ~~(40)~~(39) "Overgeneration event" has the same meaning as provided in RCW 19.280.020.
- ~~(41)~~(40) "Renewable energy credit" or "REC" means a tradable certificate of proof of one megawatt-hour of a renewable resource. The certificate includes all of the nonpower attributes associated with that one megawatt-hour of electricity and the certificate is verified by a renewable energy credit tracking system selected by the department of commerce.
- (41) "Renewable resource" has the same meaning as provided in RCW 19.405.020.
- (42) ~~"Request for proposals" or "RFP" has the same meaning as defined in WAC 480-107-007.~~
- (43) "Resource" includes, but is not limited to, generation, conservation, distributed generation, demand response, efficiency, storage, natural gas, and renewable natural gas.
- (44) "Resource need" means any current or projected deficit to reliably meet energy demands created by changes in demand, changes to system resources, or their operation to comply with state or federal requirements. Such demands or requirements may include, but are not limited to, capacity and associated energy, capacity needed to meet peak demand in any season, fossil-fuel generation retirements, equitable distribution of benefits or reduction of burdens, cost-effective conservation and efficiency resources, demand response, and renewable and nonemitting resources.

- (45) "Social cost of greenhouse gas emissions" or "SCGHG" is the inflation-adjusted costs of greenhouse gas emissions as required by RCW 80.28.395 and RCW 80.28.405, the updated calculation of which is published on the commission's website.
- (46) "Supply side resource" means, as applicable:
- (a) Any resource that can provide capacity, electricity, or ancillary services to the large combination utility's electric delivery system; or
 - (b) Any resource that can provide conventional or nonconventional gas supplies to the large combination utility's gas delivery system.
- (47) "System cost" means actual direct costs or an estimate of all direct costs of a project or resource over its effective life including, if applicable: The costs of transmission and distribution to the customers; waste disposal costs; permitting, siting, mitigation, and end-of-cycle decommissioning and remediation costs; fuel costs, including projected increases; resource integration and balancing costs; and such quantifiable environmental costs and benefits and other energy and nonenergy benefits as are directly attributable to the project or resource, including flexibility, resilience, reliability, greenhouse gas emissions reductions, and air quality.
- ~~(47)~~(48) "Targeted RFP" has the same meaning as in WAC 480-107-007.
- ~~(48)~~(49) "Vulnerable populations" has the same meaning as provided in RCW 19.405.020(39).

WAC 480-95-030 Cross-cutting assessment and planning requirements.

- (1) This section outlines key planning assumptions, inputs, constraints, and process elements that will guide the development of, and apply to all sections of the ISP.
- (2) **Requirement to use iterative analysis.** The large combination utility will utilize an iterative modeling framework and ISP development process that leads to an integrated plan wherein the different levels of the gas and electric systems are considered in conjunction with one another to achieve the ISP objectives. The large combination utility will clearly describe the modeling framework and steps in the modeling process it will use to develop the ISP and embedded action plans. The description will indicate how the framework effectuates integration across different levels of the gas and electric systems, including identifying feedback loops between steps in the framework and where there are opportunities for iteration, adjustments and integration throughout the modeling process.
- (3) **Using social cost of greenhouse gas emissions.** A large combination utility shall consider the social cost of greenhouse gas emissions, as determined by the commission pursuant to RCW 80.28.395 and 80.28.405, when developing integrated system plans and clean energy action plans. A large combination utility must incorporate the social cost of greenhouse gas emissions as a cost adder when:
- (a) Evaluating and selecting conservation policies, programs, and targets;
 - (b) Developing integrated system plans and clean energy action plans; and
 - (c) Evaluating and selecting intermediate term and long-term resource options.
- ~~(4) **Conservation and energy efficiency planning requirements.** A large combination utility shall achieve two percent of electric load annually with conservation and energy efficiency resources, unless the commission finds that a higher target is cost effective. However, the commission may accept a lower level of achievement if it determines that the requirement in this subsection is neither technically nor commercially feasible during the applicable emissions reduction period.~~

Commented [PSE9]: Simplifying edit. Not sure what "different levels" refers to.

~~(5)~~ **Demand response and demand flexibility planning requirements.** A large combination utility shall achieve annual demand response and demand flexibility equal to or greater than 10 percent of winter and summer peak electric demand, unless the commission finds that a higher target is cost effective. However, the commission may accept a lower level of achievement if it determines that the requirement in this subsection is neither technically nor commercially feasible during the applicable emissions reduction period.

~~(6)~~(4) **Emission reduction planning requirements.** In developing the long-range system plan and action plans, a large combination utility shall include analysis of how different portfolios and actions contribute to achievement of emissions reductions for both gas and electric operations equal to at least their proportional share of emissions reductions required under RCW 70A.45.020.

~~(7)~~(5) **Resource adequacy requirement and metric(s).** The integrated system plan must identify a resource adequacy requirement and measurement metrics consistent with RCW 19.405.030 through 19.405.050. The resource adequacy requirement and measurement metrics shall be used in each modeling scenario for prospectively assessing whether the large combination utility has adequate resources to meet peak energy system demand. Resource adequacy analysis must consider regional conditions.

~~(8)~~(6) **Cost test.** [placeholder]

Commented [PSE10]: These two statutory elements are only applicable to electric resources and so are not “cross-cutting”. These requirements are also addressed below in WAC 480-95-050 so not necessary to repeat here.

Commented [PSE11]: This language is unnecessarily specific to CETA and not needed here.

Commented [PSE12]: This is the appropriate place in the rule language for analyzing regional conditions.

WAC 480-95-040 Planning-A assessment of resources and the delivery system.

(1) **Distributed energy resources.**

(a) The integrated system plan must include assessments of a variety of distributed energy resources. These assessments must incorporate nonenergy costs and benefits not fully valued elsewhere within the integrated system plan model. Utilities must assess the effect of distributed energy resources on the large combination utility's load and operations under RCW 19.280.030 (1)(h). These assessments must meet the requirements of RCW 19.280.100. While the following assessments must be included, a large combination utility may combine multiple resource types into a single assessment provided that each resource type is assessed thoroughly:

(i) Conservation and demand response potential assessments – The integrated system plan must include an assessment of the commercially available conservation and efficiency resources, including demand response and load management, to achieve the conservation and energy efficiency requirements in RCW 80.86.020(4)(e) and demand response requirements of RCW 80.86.020(4)(g), as informed by the assessment for conservation potential under RCW 19.285.040 for the planning horizon consistent with subsection (2) of this section. Such an assessment may include, as appropriate, opportunities for the development of combined heat and power as an energy and capacity resource, currently employed and potential demand response and load management policies and programs, and currently employed and new policies and programs needed to obtain the conservation and efficiency resources. The value of recoverable waste heat resulting from combined heat and power must be reflected in analyses of cost effectiveness under this subsection. The results of this assessment must include the ten-year conservation potential used in calculating a biennial conservation target under chapter 480-109 WAC;

- (ii) Energy assistance potential assessment – The integrated system plan must include distributed energy programs and mechanisms identified pursuant to RCW 19.405.120, which pertains to energy assistance and progress toward meeting energy assistance need; and
 - (iii) Other distributed energy resource potential assessments – The integrated system plan must assess other distributed energy resources that may be installed by the large combination utility or its customers including, but not limited to, energy storage, electric vehicles, and photovoltaics. Any such assessment must include the effect of distributed energy resources on the large combination utility's load and operations.
- (b) Electrification potential assessment – The integrated system plan must include an assessment of the potential for voluntary electrification of customer loads.
- (2) **Supply-side resources.** The integrated system plan must provide an assessment and 20-year forecast of the availability of and requirements for regional supply side resources to provide electricity and gas to the large combination utility's customers and to meet, as applicable, the requirements of chapter 19.405 RCW and the state's greenhouse gas emissions reduction limits in RCW 70A.45.020.
 - (a) The regional supply side resource assessment and forecast must:
 - (i) include a wide range of commercially available generating and nonconventional resources, including nonconventional gas supplies and ancillary service technologies, and
 - (ii) assess commercially available supply-side resources, including a comparison of the benefits and risks of purchasing electricity or gas or building new resources.
- (3) **Delivery system assessment.** The integrated system plan must provide an assessment and 20-year forecast of the availability of and requirements for delivery system capacity to provide and deliver electricity and gas to the large combination utility's customers and to meet, as applicable, the requirements of chapter 19.405 RCW and the state's greenhouse gas emissions reduction limits in RCW 70A.45.020.
 - (a) The delivery system assessment must:
 - (i) identify the large combination utility's expected needs to acquire new electric and gas transmission rights, develop new, or expand or upgrade existing, delivery system facilities consistent with the requirements of RCW 80.60.020 and reliability standards,
 - (ii) take into account opportunities to make more effective use of existing delivery facility capacity through improved delivery system operating practices, conservation and efficiency resources, distributed energy resources, demand response, grid modernization, nonwires solutions and nonpipeline alternatives, and other programs if applicable,
 - (iii) include the large combination utility's existing gas and electric transmission capabilities and reliability, and future resource needs during the planning horizon, including identification of facilities necessary to meet future gas and electric transmission needs,
 - (iv) include an assessment of the capability and reliability of the gas transmission and distribution pipelines within the large combination utility's delivery system, and identify any necessary major categories of related investments including, but not limited to, replacements or upgrades that are included within the large

Commented [PSE13]: Unclear what this means.

Commented [PSE14]: Unclear why "regional" is added here or what effect it is intended to have on supply side resource assessments?

Commented [PSE15]: Unclear what this means.

Commented [PSE16]: PSE has thousands of pipeline projects each year so it would not be feasible to identify all of them in a 20-year planning period.

- combination utility's most recent Pipeline Replacement Plan,
- (v) identify the general location and extent of transfer capability limitations on its transmission network that may affect the future siting of resources, ~~and~~
 - ~~(vi) include a comparative evaluation of the cost of natural gas purchasing strategies, storage options, delivery resources, and improvements in conservation using the ISP cost test.~~
- (4) **Renewable resource integration.** An assessment of methods, commercially available technologies, or facilities for integrating renewable resources including, but not limited to, battery storage and pumped storage, and addressing overgeneration events, if applicable to the large combination utility's resource portfolio. The assessment may address ancillary services.

Commented [PSE17]: The cost test will be in a separate section. Not needed here.

WAC 480-95-050 Content of an integrated system plan ~~long-term section~~ planning.

- (1) **Range of forecasts.** Provide forecasts, for at least the next 20 years, of projected customer electricity and natural gas demand that takes into account econometric data and addresses changes in the number, type, and efficiency of customer usage. On a consistent timeline, the range of forecasts should additionally include:
- (a) A forecast of distributed energy resources that may be installed by the large combination utility's customers and an assessment of their effect on the large combination utility's net electric load, natural gas demand, and operations.
 - (b) Load forecast scenarios that consider the anticipated levels of zero emissions vehicle use in the large combination utility's service area, including anticipated levels of zero emissions vehicle use in the large combination utility's service area provided in RCW 47.01.520, if feasible.
- (2) **Resource evaluation.** The integrated system plan must include a comparative evaluation of all identified resources and potential changes to existing resources for achieving state energy laws ~~and policies~~ affecting energy planning, including, but not limited to the clean energy transformation standards in ~~WAC 480-100-610~~ RCW 19.405.040 and 19.405.050 and the Climate Commitment Act in ~~172-446 WAC~~ RCW 70A.65, at the lowest reasonable cost. The comparative evaluation must consider gas and electric resources.
- (3) **Economic, health, and environmental burdens and benefits.** The integrated system plan must include an assessment of energy and nonenergy benefits and reductions of burdens ~~for~~ named communities; long-term and short-term public health and environmental benefits, costs, and risks; and energy security risk. The assessment should be informed by the cumulative impact analysis conducted by the department of health.
- (4) **Scenarios and sensitivities.** The integrated system plan ~~long-term section~~ must include a range of possible future scenarios and input sensitivities for the purpose of testing the robustness of the large combination utility's resource portfolio under various parameters. The ISP must also provide a narrative description of scenarios and sensitivities the large combination utility used, including those informed by the advisory group process. The narrative description will identify the purpose ~~and use case~~ for each scenario and sensitivity.
- (a) At least one scenario or sensitivity must describe the alternative lowest reasonable cost and reasonably available portfolio that the large combination utility would have implemented if not for the requirement to comply with RCW 19.405.040 and 19.405.050, as described in WAC 480-100-660(1). This scenario or sensitivity's conditions

Commented [PSE18]: PSE prefers not to have ISP "sections" designated in statute to preserve flexibility around the organization of future ISPs.

Commented [PSE19]: Not sure what this is referring to. State laws is sufficient here.

Commented [PSE20]: Uncertain of meaning or effect on this subsection.

- and inputs should be the same as the preferred portfolio except for those conditions and inputs that must change to account for the impact of RCW 19.405.040 and 19.405.050.
- (b) All scenarios must incorporate ~~the best science available to analyze reasonable assumptions pertaining to~~ impacts resulting from climate change such as, changes in snowpack, streamflow, rainfall, heating and cooling degree days, and load changes.
- ~~(c) At least one sensitivity must be a maximum customer benefit scenario. This sensitivity should model the maximum amount of customer benefits described in RCW 19.405.040(8) prior to balancing against other goals.~~
- ~~(d)(c)~~ The large combination utility must include scenarios that achieve emissions reductions for both gas and electric operations equal to at least their proportional share of emissions reductions required under RCW 70A.45.020.
- ~~(e)(d)~~ The large combination utility must include scenarios with emissions reductions targets for both gas and electric operations for each emissions reduction period that account for the interactions between gas and electric systems.
- (5) **Portfolio analysis and preferred portfolio.** The large combination utility must integrate the demand forecasts, resource evaluations, and delivery system assessment into a long-range integrated system plan ~~solution~~ describing the mix of resources that ~~are projected to~~ meet current and ~~projected future~~ resource needs. The large combination utility's long-term integrated system plan preferred portfolio will demonstrate how it represents a portfolio approach ~~to investment plan optimization~~ across the gas and electric system and expects to:
- (a) ~~Achieve~~ ~~Comply with applicable state climate laws and policies~~ affecting energy planning, including, but not limited to the clean energy transformation standards in ~~WAC 480-100-610(1) through (3) RCW 19.405.040 and 19.405.050~~ and the Climate Commitment Act in ~~173-446 WAC RCW 70A.65~~, at the lowest reasonable cost;
- (b) Serve large combination utility load, based on hourly electric system data and ~~high load and low load hour daily peak load~~ gas system data, with the output of the large combination utility's owned resources, market purchases, and power purchase agreements, net of any off-system sales of such resources;
- (c) Achieve two percent of electric load annually with conservation and energy efficiency resources, or provide an analysis that demonstrates that this is ~~neither-not~~ technically ~~nor~~ commercially feasible during the applicable emissions reduction period;
- (d) Achieve annual demand response and demand flexibility equal to or greater than ten percent of winter and summer peak electric demand, or provide an analysis that demonstrates that this is ~~neither-not~~ technically ~~nor~~ commercially feasible during the applicable emissions reduction period;
- (e) Include all cost-effective, reliable, and feasible conservation and efficiency resources, using the methodology established in RCW 19.285.040, and demand response;
- (f) Evaluate the potential cost-effective voluntary electrification programs that may be implemented;
- ~~(g) Consider acquisition of existing renewable resources;~~
- ~~(h) In the acquisition of new resources constructed after May 7, 2019, rely on renewable resources and energy storage, insofar as doing so is at the lowest reasonable cost;~~
- ~~(i)(g)~~ Maintain and protect the safety, reliable operation, and balancing of the large combination utility's energy system, including mitigating over-generation events and achieving the identified resource adequacy requirement;
- ~~(j)(h)~~ Achieve the requirements in WAC 480-100-610 (4)(c); the description should

Commented [PSE21]: "best science available" is not clear or easily interpreted.

Commented [PSE22]: Maximizing customer benefits is a subjective task. Benefits often have trade-offs relative to other benefits and costs. PSE did not find this a useful exercise in its previous IRP.

Commented [PSE23]: Not sure this is appropriate or needed here.

Commented [PSE24]: Important for planning exercise

Commented [PSE25]: Unclear what this means. This is not an investment plan, it is a resource plan.

Commented [PSE26]: Clarifying edits to point to statutory requirements

Commented [PSE27]: The gas model doesn't do hourly data. PSE only models a daily peak load on the gas system.

Commented [PSE28]: These elements are related to resource procurement, not planning. Moved to new section below.

include, but is not limited to:

- (i) The long-term strategy and interim steps the large combination utility will take to equitably distribute benefits and reduce burdens for named communities; and
- (ii) ~~The estimated degree to which~~ A description of how benefits will be equitably distributed and burdens reduced over the planning horizon.
- ~~(k)(i)~~ (i) Assess the environmental health impacts to highly impacted communities and overburdened communities;
- ~~(4)(i)~~ (i) Analyze and consider combinations of distributed energy resource costs, benefits, and operational characteristics including ancillary services, to meet system needs; and
- ~~(m)(k)~~ (k) Incorporate the social cost of greenhouse gas emissions as a cost adder as specified in RCW 19.280.030(3) and RCW 80.28.395 and when evaluating and selecting long-term resource options.
- ~~(6) Electrification of Transportation Plan. If a large combination utility chooses to file an electrification of transportation plan as described in RCW 80.28.365, it must be filed as part of an integrated system plan and must incorporate that electrification of transportation plan, including associated costs, revenues, and other impacts, into the integrated system plan.~~
- ~~(6) Clean energy action plan (CEAP). A large combination utility must comply with WAC 480-100-620(12).~~
- (7) **Matrix of results.** The integrated system plan must include a matrix that details, for all modeled scenarios and key sensitivities, the results of the large combination utility's analysis.
 - (a) These results will include:
 - (i) The resulting preferred portfolio and other primary portfolios considered;
 - ~~(ii) The share of emissions reductions~~ from the gas and electric systems for each emission reduction period;
 - ~~(iii)(ii) Reliability impacts~~
 - ~~(iv) Projected rate impacts~~ The results of the cost test required in WAC 480-95-030(6);
 - ~~(v)(iii) New construction career opportunities;~~
 - ~~(vi)(iv) The long-term avoided cost estimate for energy, capacity, transmission, distribution, and greenhouse gas emissions costs; and~~
 - ~~(vii)(v) The resulting nonenergy costs and benefits and whether they accrue to the large combination utility, customers, participants, large combination utility customers in named communities, or the general public.~~
 - (b) The large combination utility may provide this content as an appendix.
- (8) **Information relating to purchases of electricity from qualifying facilities.** Each large combination utility must provide information and analysis that it will use to inform its annual filings required under chapter 480-106 WAC. The detailed analysis must include, but is not limited to, the following components:
 - (a) A description of the methodology used to calculate estimates of the avoided cost of energy, capacity, transmission, distribution and emissions averaged across the large combination utility; and
 - (b) Resource assumptions and market forecasts used in the large combination utility's schedule of estimated avoided cost required in WAC 480-106-040 including, but not limited to, cost assumptions, production estimates, peak capacity contribution estimates and annual capacity factor estimates.
- (9) **Report of substantive changes.** Each ISP must include a summary of substantive changes to

Commented [PSE29]: Unclear and not necessarily suited to equitable distribution of benefits which has qualitative aspects.

Commented [PSE30]: PSE recommends the TEP be optional. For several reasons outlined in our written comments, PSE does not plan to consolidate the TEP with the ISP in 2027.

Commented [PSE31]: PSE is uncertain how to include this information in a matrix.

Commented [PSE32]: PSE is uncertain how to include this information in a matrix and prefers to address this statutory reference qualitatively in the ISP

Commented [PSE33]: Clarifying edits

- modeling methodologies or inputs that result in changes to the large combination utility's resource need, as compared to the large combination utility's previous applicable plans.
- (10) **Report of progress.** The integrated system plan must include a report on the large combination utility's progress towards implementing the recommendations contained in its previously filed approved integrated system plan. For the purposes of this requirement, these recommendations must address suggestions provided by public commenters, advisory group members, commission staff, or other stakeholders that were not, or could not be, fully addressed in the previously filed integrated system plan filing. For a large combination utility's first integrated system plan, this report should include progress towards implementing the recommendations contained in the previously filed plans that are now consolidated into its integrated system plan.
- (11) **Summary of public comments.** A large combination utility must provide a summary of public comments received during the development of its integrated system plan and the large combination utility's responses, including whether issues raised in the comments were addressed and incorporated into the final integrated system plan as well as documentation of the reasons for rejecting any public input. The large combination utility may include the summary as an appendix to the final integrated system plan. Comments with similar content or input may be consolidated with a single large combination utility response.

Commented [PSE34]: Narrowing this to maintain scope relevant to the ISP.

Commented [PSE35]: This content may not be necessary and may be duplicative and overly burdensome if PSE is required to provide annual progress reports. PSE recommends removing this section.

Commented [PSE36]: This requirement is more appropriately integrated into the public participation section of the rules – see PSE's recommendations for that section. PSE provides detailed feedback reports throughout the engagement process that are available on the ISP website.

Commented [PSE37]: This requirement is more appropriately integrated into the public participation section of the rules – see PSE's recommendations for that section. PSE provides detailed feedback reports throughout the engagement process that are available on the ISP website.

WAC 480-95-060 Content of an integrated system plan – implementation section.

- (1) The large combination utility must propose an implementation plan outlining the specific actions to be taken by the large combination utility during the implementation period. The implementation plan must include:
- (a) A Clean energy implementation plan (CEIP). A large combination utility must comply with WAC 480-100-640 except WAC 480-100-640(11).
 - (b) The amount of conservation and efficiency resources the utility expects to achieve pursuant to RCW 80.86.020 (4) (e).
 - (c) The amount of demand response and demand flexibility the utility expects to achieve pursuant to RCW 80.86.020(4)(f).
 - (d) A description of low-income programs that the utility expects to undertake to provide demonstrated material benefits to low-income participants as required in RCW 80.86.020 (4) (h) and (j).
 - (e) Any potential cost-effective voluntary electrification programs that may be implemented.
 - (f) A description of any anticipated actions to coordinate with community based organizations to implement the ISP implementation plan.
 - (g) Any large combination utility's planned gas capital investments that exceed \$1,000,000.
- (2) If a large combination utility files an electrification of transportation plan as part of the integrated system plan, the programs described in RCW 80.28.365 must be included as specific actions.
- (3) During the implementation period of an ISP a large combination utility may be exempt from portions of WAC 480-107 as follows:
- (a) For a large combination utility, the required RFP issued pursuant WAC 480-107-009 may be an all-source RFP, multiple-source RFP, targeted RFP, or combination of targeted RFPs. A large combination utility shall choose the type or types of required RFPs based

Commented [PSE38]: With this addition, all of the requirements in WAC -640 do not need to be repeated in the ISP rules. This will streamline and simplify the rules. These requirements should remain specific to the CEIP, not broadened to apply to all aspects of the ISP.

Commented [PSE39]: These elements are meant to capture the implementation related requirements from HB 1589 that are not covered in the CEIP.

Commented [PSE40]: Moved this language up from below.

- on market conditions and their consistency with analysis underlying the approved ISP. A large combination utility shall issue the RFP or RFPs required under this section no later than 120 days after the commission issues an order approving an ISP.
- (b) To facilitate compliance with the Clean Energy Transformation Act, a large combination utility may request approval of RFP processes within the ISP. These processes may include the selection of the independent evaluator for the duration of the ISP period and standard RFP documentation. To avoid duplicative analysis, any approvals regarding RFP processes may supersede WAC 480-107-017 and 480-107-023.
- (c) To ensure process requirements are limited to instances of significant potential investment and will not interfere in short-term operations, a large combination utility is exempt from WAC 480-107 for electric acquisitions below 100 megawatts or five years in aggregate. To ensure adequate oversight of the acquisitions exceeding this threshold, the commission must approve any agreements for the acquisition of a resource within 60 days after the filing of such agreements pursuant to WAC 480-107-035.
- (4) In acquiring electric resources pursuant to the specific actions approved by the Commission, a large combination shall:
- (a) Consider acquisition of existing renewable resources;
- (b) Rely on renewable resources and energy storage, insofar as doing so is at the lowest reasonable cost.
- (1) **Clean energy action plan (CEAP).** The large combination utility must develop a ten-year clean energy action plan for implementing RCW 19.405.030 through 19.405.050. The CEAP must:
- (a) Be at the lowest reasonable cost;
- (b) Identify and be informed by the large combination utility's ten-year cost-effective conservation potential assessment as determined under RCW 19.285.040, if applicable;
- (c) Identify potential programs to achieve the requirements of RCW 80.86.020(4)(e);
- (d) Identify how the large combination utility will meet the requirements in WAC 480-100-610 (4)(e) including, but not limited to:
- (i) Describing the specific actions the large combination utility will take to equitably distribute benefits and reduce burdens for named communities;
- (ii) Estimating the degree to which such benefits will be equitably distributed and burdens reduced over the CEAP's ten-year horizon; and
- (iii) Describing how the specific actions are consistent with the long-term strategy described in WAC 480-95-030 (12)(j).
- (e) Establish a resource adequacy requirement;
- (f) Identify the potential demand response and load management programs that may be acquired including those needed to achieve the requirements of RCW 80.86.020(4)(g);
- (g) Identify the potential cost-effective voluntary electrification programs that may be implemented;
- (h) Identify renewable resources, nonemitting electric generation, and distributed energy resources that may be acquired and evaluate how each identified resource may be expected to contribute to meeting the large combination utility's resource adequacy requirement;
- (i) Identify any need to develop new, or to expand or upgrade existing, bulk transmission and distribution facilities and document existing and planned efforts by the large combination utility to make more effective use of existing transmission capacity and secure additional transmission capacity consistent with the requirements of the ISP's

Commented [PSE41]: This section provides improvements to improve transparency and efficiency of the existing purchase of resources rules to create a logical process associated with the approval of the ISP for large combination utilities. See PSE's written comments for more explanation and discussion.

Commented [PSE42]: Moved from above as this language fits better here in association with other procurement related items.

Commented [PSE43]: This is addressed through the addition of -050(6) above.

- delivery system assessment;
- (j) Detail the large combination utility's planned gas plant capital investments including
 - (i) proposed capital expenditures and investments by category, and
 - (ii) the location and costs of planned pipeline replacement and repairs, presented with sufficient information about their timing, location, and impetus for the Commission and interested parties to understand how they fit into the larger context of the ISP and its proposed resource and delivery system investments;
 - (k) Identify the nature and possible extent to which the large combination utility may need to rely on alternative compliance options under RCW 19.405.040 (1)(b), if appropriate; and
 - (l) Incorporate the social cost of greenhouse gas emissions as a cost adder as specified in RCW 19.280.030(3) and RCW 80.28.395.
- (2) **Interim Targets.**
- (a) Each utility must propose a series of interim targets that:
 - (i) Demonstrate how the utility will make reasonable progress toward meeting the standards identified in WAC 480-100-610 (2) and (3);
 - (ii) Are consistent with WAC 480-100-610(4); and
 - (iii) Demonstrate compliance with state laws and policies including, but not limited to, the Climate Commitment Act chapter 173-446 WAC.
 - (b) Each utility must propose interim targets in the form of the percent of forecasted retail sales of electricity supplied by nonemitting and renewable resources prior to 2030 and from 2030 through 2045.
 - (c) Each interim target must be informed by the utility's historic performance under median water conditions.
- (3) **Specific targets.**
- (a) Each large combination utility must propose specific targets for energy efficiency, demand response, renewable energy, and emissions reduction:
 - (i) Energy efficiency. The large combination utility's energy efficiency target must represent achieving two percent of electric load annually with conservation and energy efficiency resources, unless the commission finds that a higher target is cost effective. The energy efficiency target must encompass all other energy efficiency and conservation targets and goals the commission requires the utility to meet. The specific energy efficiency target must be described in the utility's biennial conservation plan required in chapter 480-109 WAC. The utility must provide forecasted distribution of energy and nonenergy costs and benefits.
 - (ii) Demand response. The large combination utility's demand response target must represent annual demand response and demand flexibility achieving at least 10 percent of winter and summer peak electric demand, unless the commission finds that a higher target is cost effective. The large combination utility must provide proposed program details, program budgets, measurement and verification protocols, target calculations, and forecasted distribution of energy and nonenergy costs and benefits for the utility's demand response target.
 - (iii) Renewable energy. The large combination utility must propose the renewable energy target as the percent of retail sales of electricity supplied by renewable resources and must provide details of renewable energy projects or programs, program budgets as applicable, and forecasted distribution of energy and

- nonenergy costs and benefits.
- (iv) Emissions reduction. The large combination utility's emissions reduction target must represent emissions reductions for the emissions reduction period that are at least as stringent as the limits established in RCW 70A.45.020.
- (b) The large combination utility must provide a description of the technologies, data collection, processes, procedures, and assumptions the utility used to develop the targets in this subsection. The utility must make data input files that are used to determine relevant targets available in native format and in an easily accessible format as an appendix.
- (4) **Customer benefit data.** Each integrated system plan implementation section must:
- (a) Identify highly impacted communities using the cumulative impact analysis pursuant to RCW 19.405.140 combined with census tracts at least partially in Indian Country;
- (b) Identify vulnerable populations based on adverse socioeconomic factors and sensitivity factors developed through the advisory group process and public participation plan described in WAC 480-95-080, describing and explaining any changes from the utility's most recently approved CEIP or integrated system plan as applicable;
- (c) Identify overburdened communities in accordance with RCW 70A.65.010; and
- (d) Include all customer benefit indicators, whether existing, proposed, or updated, and associated weighting factors related to WAC 480-100-610(4)(c) including, at a minimum, one or more customer benefit indicators associated with energy benefits, nonenergy benefits, reduction of burdens, public health, environment, reduction in cost, reduction in risk, energy security, and resiliency. Customer benefit indicators and weighting factors must be developed consistent with the advisory group process and public participation plan described in WAC 480-95-080. The utility should describe and explain any changes in customer benefit indicators or weighting factors from its most recently approved CEIP or ISP.
- (e) Include an assessment, informed by the cumulative impact analysis conducted under RCW 19.405.140, of: Energy and nonenergy benefits and the avoidance and reductions of burdens to named communities; long-term and short-term public health and environmental benefits, costs, and risks; and energy security and risk.
- (5) **Specific actions.** Each integrated system plan implementation section must include the specific gas and electric system actions the utility will take over the implementation period. The specific actions must meet and be consistent with the clean energy transformation standards and other state laws and regulations affecting energy planning including the Climate Commitment Act and be based on the utility's clean energy action plan and interim and specific targets. Taken together, the specific actions must represent a portfolio approach to investment plan optimization.
- (a) Each integrated system plan implementation section must present the specific actions in a tabular format that provides the following information for each specific action:
- (i) The general location, if applicable, proposed timing, and estimated cost of each specific action or remaining resource need, including whether the resource will be located in highly impacted communities, will be governed by, serve, or otherwise benefit named communities in part or in whole;
- (ii) Metrics related to resource adequacy including contributions to capacity or energy needs; and
- (iii) Customer benefit indicator values, or a designation as nonapplicable, for every

- customer benefit indicator described in subsection (4)(c) of this section.
- (b) The specific actions of an integrated system plan must include low income electrification programs that must:
- (i) Include rebates and incentives to low income customers and customers experiencing high energy burden for the deployment of high efficiency electric-only heat pumps in homes and buildings currently heating with wood, oil, propane, electric resistance, or gas;
 - (ii) Provide demonstrated material benefits to low income participants including, but not limited to, decreased energy burden, the addition of air conditioning and backup heat sources using natural gas or energy storage systems, if necessary to protect health and safety in areas with frequent outages, or improved indoor air quality;
 - (iii) Enroll customers in energy assistance programs or provide bill assistance;
 - (iv) Include low income customer protections to mitigate energy burden, if electrification measures will increase a low income participant's energy burden; and
 - (v) Coordinate with community based organizations in the gas or electrical company's service territory including, but not limited to, grantees of the department of commerce, community action agencies, and community based nonprofit organizations, to remove barriers and effectively serve low income customers.
- (c) If a large combination utility files an electrification of transportation plan as part of the integrated system plan, the programs described in RCW 80.28.365 must be included as specific actions.
- (6) **Narrative description of specific actions.** Each integrated system plan implementation section must describe how the specific actions:
- (a) Demonstrate progress toward meeting the standards identified in WAC 480-100-610(2) and (3) and other state laws and regulations affecting energy planning including the Climate Commitment Act regulations in 173-446 WAC.
 - (b) Demonstrate consistency with the standards identified in WAC 480-100-610(4) including, but not limited to:
 - (i) An assessment of current benefits and burdens on customers, by location and population, and the projected impact of specific actions on the distribution of customer benefits and burdens during the implementation period.
 - (ii) A description of how the specific actions in the ISP implementation section mitigate risks to named communities and are consistent with the longer term strategies and actions described in the utility's most recently filed IRP or ISP long term section and CEAP as required by either WAC 480-100-620(11)(g) and (12)(c) or WAC 480-95-030(12)(j) and (13)(d).
 - (c) Are consistent with the proposed interim and specific targets.
 - (d) Are consistent with the utility's resource adequacy requirements, including a narrative description of how the resources identified in the most recent resource adequacy assessment conducted or adopted by the utility demonstrates that the utility will meet its resource adequacy standard.
 - (e) Demonstrate how the utility is planning to meet the clean energy transformation standards and other state laws and regulations affecting energy planning including the

~~Climate Commitment Act regulations in 173-446 WAC, at the lowest reasonable cost including, but not limited to:~~

- ~~(i) A description of the utility's approach to identifying the lowest reasonable cost portfolio of specific actions that meet the requirements of (a) through (c) of this subsection, including a description of its methodology for weighing considerations in WAC 480-100-610(4);~~
 - ~~(ii) A description of the utility's methodology for selecting the investments and expenses it plans to make over the next four years that are directly related to the utility's compliance with the clean energy transformation standards consistent with RCW 19.405.050(3)(a), and a demonstration that its planned investments represent a portfolio approach to investment plan optimization; and~~
 - ~~(iii) Supporting documentation justifying each specific action identified in the integrated system plan implementation section.~~
- (7) ~~Projected incremental cost.~~ Each integrated system plan implementation section must include a projected incremental cost as outlined in WAC 480-100-660(4).
- (8) ~~Report of progress.~~ Each integrated system plan implementation section must include a report on the large combination utility's progress towards implementing the recommendations contained in its previously filed integrated system plan. For the purposes of this requirement, these recommendations must address suggestions provided by public commenters, advisory group members, commission staff or others that were not, or could not be, fully addressed in the previously filed integrated system plan filing. For a large combination utility's first integrated system plan, this requirement may be met by reporting on the utility's progress towards implementing the recommendations contained in its most recently filed CEAP and, if applicable, its work plan filed pursuant to RCW 80.86.020(3).
- (9) ~~Alternative compliance.~~ The large combination utility must describe any plans it has to rely on alternative compliance mechanisms as described in RCW 19.405.040(1)(b).

Commented [PSE44]: Not needed, replaced by reference to WAC 480-100-640, which includes this requirement.

Commented [PSE45]: Duplicative of earlier section.

Commented [PSE46]: Not needed, replaced by reference to WAC 480-100-640, which includes this requirement

Commented [PSE47]: The following sections are replaced by the reference to the existing CEIP WAC above in (1). This content is all contained in that WAC section as it pertains to the CEIP. This will keep the rules consistent across utilities for the CEIP implementation pursuant to CETA.

WAC 480-95-070 Reporting and compliance.

- (1) **Clean energy compliance report.** A large combination utility must file with the commission a clean energy compliance report as described in WAC 480-100-650(1)(a) ~~(4)~~ within 6 months of the end of each implementation period. As part of this report, a large combination utility must also:
- (a) Include a summary of the steps taken to adaptively manage the large combination utility's portfolio and programs throughout the ~~compliance implementation period~~;
 - (b) Report ~~any voluntary~~ electrification achievements using metrics consistent with subsection (3), below;
 - (c) ~~Demonstrate whether and how the large combination utility met its emissions reduction specific targets. Report system emissions in carbon dioxide equivalent emissions, and percent change from emissions baseline; and~~
 - (c)
 - (d) Include a report of its work to comply with the requirements of RCW 80.86.030 during the last ~~compliance implementation~~ period.
- (2) **Clean energy compliance report review process.** ~~The process for written comments, review, and determination of compliance will be conducted pursuant to the requirements in WAC 480-100-650(2).~~

Commented [PSE48]: The statute does not create a requirement to set emission reduction targets as part of the implementation plan.

Commented [PSE49]: Not appropriate to point to an electric WAC for approval of the comprehensive ISP report.

- (a) Interested persons may file written comments with the commission regarding the utility's clean energy compliance report within 60 days of the utility's filing unless the commission states otherwise.
- (b) The commission may review clean energy compliance reports through the commission's open public meeting process, as described in 480-07 WAC.
- (e)(c) After completing its review of the utility's clean energy compliance report, the commission will determine whether the utility met its CEIP specific and interim targets and whether the utility made sufficient progress toward meeting the clean energy transformation standards in WAC 480-100-610.

~~(2)~~**(3) Annual clean energy progress reports.** By June 1 of each calendar year, a large combination utility must file with the commission, in the same docket as its most recently filed ISP, an informational annual clean energy progress report regarding its progress in meeting CEIP targets during the preceding year. A large combination utility must make annual clean energy progress reports available on its website. These reports must include all of the requirements of WAC 480-100-650(3) and (4), and:

- (a) Any voluntary electrification achievement expressed as estimated equipment installations both the and, to the extent available, estimated reductions in peak dekatherms per day, first year dekatherms, and lifetime dekatherms, and the associated increase in peak MW, and first-year MWh.
- (b) ~~Emissions~~ System emissions reduction achievement in carbon dioxide equivalent emissions, and percent reduction change from emissions baseline.
- (c) A summary of the steps taken to adaptively manage the large combination utility's portfolio and programs throughout the preceding year.
- ~~(d) Meet the renewable portfolio standard annual reporting requirements as described in WAC 480-109-210. To the extent these reporting requirements would be duplicative of requirements of the annual clean energy progress report, a large combination utility may provide a key that cites the specific place(s) within its annual clean energy progress report where renewable portfolio standard annual reporting requirements are met.~~
- (d) Report progress in the preceding year in meeting the renewable energy targets established in RCW 19.285.040, including:
 - i. The utility annual load for the prior two years;
 - ii. The amount of megawatt-hours needed to meet the annual renewable energy target in 19.285.040(2);
 - iii. The amount of megawatt-hours of each type of eligible renewable resource acquired;
 - iv. The type and amount of renewable energy credits acquired; and
 - v. The percent of its total retail revenue requirement invested in the incremental cost of eligible renewable resources and the cost of renewable energy credits.
 - vi. For each year that the large combination utility elects to demonstrate alternative compliance under RCW 19.285.040(2)(d) or 19.285.050(1), it must include in its annual report relevant data to demonstrate that it met the criteria in that section.
- (e) Metrics used to track progress towards implementing the large combination utility's electrification of transportation plan, if applicable the transportation electrification plan is consolidated into the ISP.
- ~~(f) Metrics used to track customer benefit indicators.~~

Commented [PSE50]: As previously commented, WAC 480-109-210 contains outdated requirements that are not relevant to large combination utilities. PSE suggests the following alternative language for EIA renewable energy compliance reporting. Please see our comments for more information.

Commented [PSE51]: CBI's are reported in the compliance report in section 2.

WAC 480-95-080 Procedures.

- ~~(1) **Public participation.** Public participation in an integrated system plan must meet the requirements for public participation in a CEIP under WAC 480-100-655, and must:~~
- ~~(a) Consider, with input from existing advisory groups, whether new advisory group members are needed given the scope of the integrated system plan~~
 - ~~(b) Provide to the large combination utility's gas customers the same level of participation and notice provided to its electric customers~~

Commented [PSE52]: Proposed to be replaced by new section below which creates a public participation section specifically for the ISP purposes.

- ~~(2)(1) **Publicly available information.** The large combination utility must make the following information publicly available on its website:~~
- ~~(a) Meeting summaries and materials for advisory group meetings, including materials for future meetings;~~
 - ~~(b) A current schedule of advisory group meetings and significant topics to be covered, actively regularly updated by the company and changes highlighted;~~
 - ~~(c) Information on how members of the public may participate in advisory group meetings; and~~
 - ~~(d) Advisory group comments about the ISP and its development received to date, including responses communicating how the subject of the input was considered or used. Comments with similar content or input may be consolidated with a single large combination utility response.~~

Commented [PSE53]: More appropriate term

~~(3)(2) **Data disclosure.**~~

- ~~(a) The large combination utility must file its modeling data inputs with the commission in native format per RCW 19.280.030 (10)(a) and (b) and in an easily accessible format, as soon as they are reasonably available during the integrated system plan developing process.~~
- ~~(b) The large combination utility must file the outputs, and any associated modeling files with the commission in native format per RCW 19.280.030 (10)(a) and (b) and in an easily accessible format as an appendix to the integrated system plan.~~
- ~~(c) The large combination utility must provide any confidential inputs, outputs, and any associated modeling files in native format and in an easily accessible format to commission staff and interested parties who have signed a confidentiality agreement or nondisclosure agreement.~~
- ~~(d) If the large combination utility's integrated system plan analysis relies on software that is subject to a license fee, the utility must provide licenses for commission staff and up to three interested parties.~~

Commented [PSE54]: PSE has significant concerns about filing modeling data prior to the filing of the ISP. See our written comments for more details.

~~(4) **Timing.**~~

- ~~(5) A large combination utility must file its first integrated system plan or ISP with the commission on the following timeline, unless otherwise ordered by the Commission:~~

~~A draft ISP by January 1, 2026;~~

~~A final ISP by April 1, 2027;~~

- ~~(6)(3) A large combination utility must file subsequent ISPs and ISP midway updates with the commission on the following timeline, and every four years thereafter, unless or as otherwise ordered by the commission:~~

- ~~(i) A draft ISP by July 1, 2029;~~
- ~~(ii) The final ISP by October 1, 2029;~~
- ~~(iii) An ISP midway update by July 1, 2032.~~

Commented [PSE55]: This language is unnecessary and may conflict with or cause confusion with existing UTC rules and requirements. PSE prefers to follow existing rules for sharing confidential information.

Commented [PSE56]: It seems more practical to use intervenor funding for this – which would allow the Commission an established process for decision-making.

Commented [PSE57]: PSE recommends removing specific dates from the rules to provide more flexibility. This is something that can be done through commission order.

~~(7)(4)~~ **ISP work plan.** ~~No later than 15 months prior to the due date of its integrated system plan or 6 months before the large combination utility anticipates it will need to finalize any key ISP inputs, whichever is earlier, t~~he large combination utility must file a work plan that includes advisory group input and outlines the content of the ISP ~~and expectations for the subsequent midway update.~~ The large combination utility must include the following in its work plan:

- (a) ~~An general description of t~~he methods for assessing potential resources;
- ~~(b) A list of proposed schedule of meetings topics~~ for the large combination utility's advisory groups, and the public, for the ISP;
- ~~(c)(b) A list of significant topics, consistent with WAC 480-100-620, that will be discussed at each advisory group meeting for the ISP;~~
- ~~(d) The date the draft ISP will be filed with the commission;~~
- ~~(e)(c)~~ The date the ~~final~~ ISP will be filed;
- ~~(f)(d)~~ A link to the large combination utility's website, updated in a timely manner, to which the utility posts and makes publicly available information related to the IRP, ~~including information outlined in subsection (3) of this section;~~
- ~~(g)(e)~~ If the large combination utility ~~anticipates makes~~ significant changes in the workplan, it must file an updated workplan.

~~(8)~~ **Draft ISP.** ~~At minimum, the draft ISP must include the preferred portfolio, CEAP, specific targets, interim targets, and supporting analysis, and to the extent practicable all scenarios, sensitivities, appendices, and attachments.~~

- ~~(a) The commission will hear public comment on the draft ISP at an open meeting scheduled after the utility files its draft ISP. The commission will accept public comments electronically and in any other available formats, as outlined in the commission's notice for the open public meeting and opportunity to comment.~~
- ~~(b) The large combination utility must file with the commission completed presentation materials concerning the draft ISP at least five business days prior to the open meeting.~~

~~(9)~~ **ISP midway update.**

- ~~(a) On the timeline described in subsection (4), above, a large combination utility must file a midway update if any of the following conditions are true:~~
 - ~~(i) The large combination utility is proposing changes to its interim or specific targets;~~
 - ~~(ii) The large combination utility's load forecasts have substantially changed since its most recent ISP, or~~
 - ~~(iii) The large combination utility's resource assumptions have substantially changed since its most recent ISP.~~
- ~~(b) In each midway update, the large combination utility must update at least the following elements of its ISP long term section:~~
 - ~~(i) Load forecast;~~
 - ~~(ii) Demand side resource assessment, including a new conservation potential assessment;~~
 - ~~(iii) Resource costs; and~~
 - ~~(iv) The portfolio analysis and preferred portfolio.~~
- ~~(c) In each midway update, the large combination utility must provide an update to its ISP implementation section. This update may be limited to the biennial conservation plan requirements under chapter 480-109 WAC and must also include an explanation of how the update will modify targets in its ISP implementation section, if applicable. The utility~~

Commented [PSE58]: Suggest removing requirement to file a draft ISP.

Commented [PSE59]: Suggest removing the requirement to file a draft ISP. As explained further in written comments, the filing of a draft ISP creates duplicative process that is unnecessary and burdensome on the utility and interested parties. PSE anticipates sharing draft ISP materials informally with interested parties and the RPAG.

Commented [PSE60]: Given the complexity and intensity of the external engagement process for the ISP, it is not possible to produce a midway update. Please see PSE's comments for more discussion on this issue.

~~may file in the midway update other proposed changes to the ISP implementation section resulting from updates to the ISP long term section of the midway update.~~

~~(d) The midway update must include other updates that are necessary due to changing state or federal requirements, or significant changes to economic or market forces.~~

~~(10)(5)~~ **Final ISP and midway update Approval process.** The utility's ~~filed~~ ~~ISP and midway update~~ ~~filing~~ will be set for an open public meeting. On the commission's own motion or at the request of any person who has a substantial interest in the subject matter of the filing, the commission may initiate an adjudication, or if appropriate a brief adjudicative proceeding, to consider the filing. The commission will enter an order approving, rejecting, or approving with conditions the utility's ISP ~~or midway update~~ at the conclusion of its review within 12 months of the filing. The commission may, in its order, recommend or require more ~~or less~~ stringent ~~CEIP~~ targets than those the utility proposes.

(a) The commission may adjust or expedite ~~CEIP~~ interim and specific target timelines when issuing a decision on an ISP ~~or midway update~~.

(b) Any party requesting the commission make existing ~~CEIP~~ targets more stringent or adjust existing timelines has the burden of demonstrating the utility can achieve the ~~CEIP~~ targets or timelines in a manner consistent with the requirements of RCW 19.405.060 (1)(c)(i) through (iv).

~~(c)~~ The Commission will evaluate the Integrated System Plan based on whether it is in the public interest and ~~its impact on~~ based on the factors listed in RCW 80.86.020 (11).

WAC 480-95-090 Public participation.

(1) The integrated system plan filing must:

(a) Explain the extent of advisory group and other public participation in the development of the integrated system plan, including, but not limited to, a summary of the advisory group member comments.

(b) Indicate all specific actions where public participation is anticipated and include a summary of anticipated activities that will support implementation of the action.

(2) **Advisory groups.** The utility must demonstrate and document how it considered input from advisory group members in the development of its ISP. Examples of how the utility may incorporate advisory group input include: Using modeling scenarios, sensitivities, and assumptions advisory group members proposed and using data and information supplied by advisory group members as inputs to plan development. As part of this process, the utility must communicate to advisory group members about whether and how the utility used their input in its analysis and decision-making, including explanations for why the utility did not use an advisory group member's input.

(a) The utility must involve all advisory groups in the development of its ISP, including the equity advisory group identified in (b) of this subsection.

(b) The utility must maintain and regularly engage an external equity advisory group to advise the utility on equity issues including, but not limited to, vulnerable population designation, equity customer benefit indicator development, data support and development, and recommended approaches for the utility's compliance with WAC 480-100-610 (4)(c)(i). The utility must encourage and include the participation of environmental justice and public health advocates, tribes, and representatives from highly impacted communities and vulnerable populations in addition to other relevant

- groups.
- (c) The utility must convene advisory groups, with reasonable advance notice, at regular meetings open to the public during the planning process. A utility must notify advisory groups of company and commission public meetings scheduled to address its ISP.
 - (d) Engaging with advisory groups for the purposes of developing the ISP does not relieve the utility of the obligation to continue to convene and engage these groups for their individual topical duties. This section does not supersede existing rules related to those groups.
 - (e) Nothing in this section limits the utility from convening and engaging public advisory groups on other topics.
 - (f) Participation in an advisory group does not restrict groups and individuals from commenting on ISP filings before the commission.
 - (g) The utility must make available completed presentation materials for each ISP advisory group meeting at least three business days prior to the meeting. The utility may update materials as needed.
 - (h) The utility must make all its data inputs and files used to develop its ISP available to the commission in native file format and in an easily accessible format when it files its final ISP. The utility may make confidential information available by providing it to the commission pursuant to WAC 480-07-160. The utility should minimize its designation of information in the ISP as confidential. Nonconfidential contents of the ISP and supporting documentation as well as nonconfidential data inputs and files must be available for advisory group review in an easily accessible format upon request. Nothing in this subsection limits the protection of records containing commercial information under RCW 80.04.095.
 - (i) As part of the filing of its ISP with the commission, the utility must provide a summary of advisory group comments received during the development of its ISP and the utility's responses, including whether issues raised in the comments were addressed and incorporated into the final ISP as well as documentation of how public input was used. The utility must include the summary as an appendix to the final ISP. Comments with similar content or input may be consolidated with a single utility response.
- (3) Public participation and education.** The utility must involve advisory groups in developing the timing and extent of meaningful and inclusive public participation throughout the development and duration of the ISP, including outreach and education serving vulnerable populations and highly impacted communities.
- (a) On a reasonable timeline prior to the due date of its integrated system plan filing, the large combination utility must file a work plan that includes advisory group and public input and outlines the content of the ISP. The large combination utility must include the following in its work plan:
 - (i) A general description of methods for assessing potential resources;
 - (ii) A list of proposed topics for the large combination utility's advisory groups, and the public, for the ISP;
 - (iii) Plans to provide information and data in broadly understood terms through meaningful participant education;
 - (iv) Identification of barriers to public participation including, but not limited to, language, cultural, economic, or other factors, and strategies for reducing barriers to public participation;

- (v) The date the final ISP will be filed;
 - (vi) A link to a website accessible to the public and managed by the utility, to which the utility posts and makes publicly available the following information:
 - (A) Meeting summaries and materials for all relevant meetings, including materials for future meetings;
 - (B) A current schedule of advisory group meetings and significant topics to be covered;
 - (C) Information on how the public may participate in ISP development; and
 - (D) The final ISP posted within 30 days of final commission action.
 - (vii) If the large combination utility anticipates significant changes to the methods described in the workplan, it must file an updated workplan.
- (b) In developing the ISP, the large combination utility must consider and incorporate timing, methods, and language considerations for seeking and considering input from:
- (i) Vulnerable populations and highly impacted communities for the creation of or updates to customer benefit indicators and weighting factors for the utility's compliance with WAC 480-100-610(4)(c)(i); and
 - (ii) All customers, including vulnerable populations and highly impacted communities, for the creation of, or updates to, customer benefit indicators and any weighting factors for the utility's compliance with WAC 480-100-610(4)(c)(ii) and (iii).
- (4) Within 30 days of filing the utility's ISP, the utility must inform customers of the filing and requirements under chapter 19.405 RCW, briefly summarize the utility's ISP, and inform customers of how they may comment on the utility's filing. The notice must include:
- (a) The date the notice is issued;
 - (b) The utility's name and address;
 - (c) A website link that navigates to the full ISP;
 - (d) A statement that the commission has the authority to approve the ISP, with or without conditions, or reject the ISP;
 - (e) A description of how customers may contact the utility if they have specific questions or need additional information about the ISP; and
 - (f) Public involvement language pursuant to WAC 480-100-194(4)(j).