



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

Public Counsel

800 Fifth Ave • Suite 2000 • MS TB-14 • Seattle, WA 98104-3188 • (206) 464-7744

December 5, 2019

VIA UTC WEB PORTAL

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

Re: *Puget Sound Energy's 2020-21 Biennial Conservation Plan,*
Docket UE-190905

Dear Mr. Johnson:

On November 6, 2019, The Utilities and Transportation Commission (“Commission”) requested comments on Puget Sound Energy’s (PSE or “Company”) Biennial Conservation Plan (BCP) filed with the Commission on November 1, 2019. Public Counsel respectfully submits the enclosed comments and recommends approving the Company’s BCP with the conditions proposed by Commission Staff.

Public Counsel actively participated in Conservation Resource Advisory Group (CRAG) meetings during the formation and development of the Company’s ten-year achievable conservation targets and the subsequent BCP to achieve that target. Throughout that process, the Company provided a great deal of information and was receptive to suggestions from all involved stakeholders. Public Counsel appreciates PSE’s willingness to collaborate actively with CRAG members.

For the first time, PSE proposed pursuing energy efficiency projects using localized avoided cost calculations, or Targeted Demand Side Management. The intent of Targeted Demand Side Management is to pursue energy savings in portions of the Company’s service territory where new infrastructure investments could be avoided with reductions in customer load achieved through conservation. In order to pursue these projects, the Company would base its cost effectiveness calculations on a localized avoided costs, based specifically on the customer’s serve by assets that would otherwise be subject to new capital investments. Public Counsel is supportive of efforts to pursue conservation through innovative means, but it was important to ensure initial Targeted Demand Side Management projects would be pursued as pilot programs. This would allow for proper evaluation and review of the program before it would be pursued on a wider basis. The Company accepted Public Counsel’s feedback and included Targeted Demand Side Management as a pilot program in this BCP.

Received
Records Management
12/05/19 10:49
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

ATTORNEY GENERAL OF WASHINGTON

To: Mark L. Johnson
Re: Docket UE-190905
Date: December 5, 2019
Page 2 of 2

Public Counsel also supports the conditions proposed by Staff, as it relates to modifying or retaining the ten-year conservation potential as a result of the Clean Energy Transformation Act. Ongoing workshops, rulemakings, and other stakeholder engagements stemming from the Clean Energy Transformation Act are likely to affect the Company's conservation target and would result in differences between targets currently set in the BCP. Filing a petition to update or retain conservation targets by April 15, 2020, would allow the Company sufficient time to make adjustments to their models and develop more accurate targets to achieve all cost-effective conservation and follow new requirements under state law (i.e. accounting for the social cost of carbon). Public Counsel, along with other stakeholders, had the opportunity to review the conditions as proposed by Staff.

Public Counsel appreciates the Company's detailed BCP and all of the work that went into its creation. PSE accepted stakeholder comments and questions on the plan at every stage of its formation and provided timely, thoughtful responses. The Commission should approve PSE's 2020-21 BCP with the conditions proposed in Staff's memo.

Questions can be directed to Corey Dahl, at (206) 464-6380 or corey.dahl@atg.wa.gov.

Sincerely,

/s/ Corey J. Dahl
COREY J. DAHL
Regulatory Analyst
Public Counsel Unit
Washington State Office of the Attorney General.