February 15, 2022

Dear Secretary Maxwell,

I am writing regarding to comment on PSE’s Clean Energy Implementation Plan (CEIP). My comments are as follows:

- PSE needs to move more rapidly to reduce demand and convert to clean energy sources in its portfolio, including wind, solar, storage and distributed energy resources. They need more aggressive programs to incentivize demand reduction including demand response and time varying rates.
- The CEIP does not include climate forecasting. The models rely on 90 years of past temperature data, and therefore PSE is basing their investments on energy resources that are designed to serve cooler temperatures than we will actually experience. Summer peak demand is highly likely to increase, and local generation of solar energy and battery storage need to be emphasized to address distribution line stress during heat dome events, which we expect to become more frequent.

Thank you for the opportunity to comment.

Sincerely,

Deb Rudnick