

Agenda Date: August 12, 2021
Item Number: A06

Docket: UE-210571
Company: Puget Sound Energy

Staff: Kyle Frankiewicz, Regulatory Analyst

Recommendation

Issue an order in Docket UE-210571 granting Puget Sound Energy’s motion and petition filed on July 21, 2021, and allowing the utility to file its draft Clean Energy Implementation Plan (CEIP) by October 15, 2021, and its final CEIP by December 17, 2021.

Background

Electric investor-owned utilities must file clean energy implementation plans (CEIPs) by October 1, 2021, and every four years thereafter.¹ Additionally, the companies must file drafts of their first CEIPs by August 15, 2021.² The Washington Utilities and Transportation Commission (Commission) can grant an exemption to the rules and amend past orders.³

On July 21, 2021, PSE filed a petition and motion to revise the deadlines for the Company’s draft and final CEIP filings.⁴ PSE claims delaying its draft CEIP and final CEIP filings until October 15, 2021, and December 17, 2021, respectively, is in the public interest as it will “allow additional time for the new Equity Advisory Group, as well as other advisory groups, to provide input” on the CEIP filings.⁵ PSE also contends that the extra time may enable the Company to “incorporate new and/or updated information” into its CEIP analysis.⁶

¹ Per WAC 480-100-640(1).

² Dockets UE-191023 & UE-109698 (*Consolidated*), General Order 601, pp. 9-10, ¶ 25 (CETA Rulemaking Order) (Dec. 28, 2020).

³ Company operations rules in WAC 480-100-008 allow the Commission to grant an exemption to the rules in Chapter 480-100 WAC, if such an exemption is in the public interest. WAC 480-07-875(1) and WAC 480-07-395(4) give the Commission discretion in amending orders and interpreting motions, respectively.

⁴ In Docket UE-210571, PSE filed both a motion for an exemption of General Order 601 and a petition for exemption of WAC 480-100-640(1). Functionally, the motion and petition function can be considered jointly as one request. A similar procedural approach was taken by Pacific Power & Light Company when that utility requested an extension of its CEIP filing deadlines in Docket UE-210223.

⁵ Docket UE-210571, Motion of Puget Sound Energy for Exemption of General Order 601 in Dockets UE-191023 and UE-190698, ¶6. Filed July 21, 2021.

⁶ *Ibid.*

Discussion

Commission staff (Staff) understands that the Company's Equity Advisory Group (EAG), would benefit from more time to learn more about PSE's system, and to develop a better understanding of how the group's feedback will influence PSE's filings. Further, Staff has heard that the current CEIP deliverable timetable per adoption order and rule would lead the EAG to perceive that PSE is moving forward without consideration of the EAG's concerns, which would compromise efforts to establish a healthy working relationship between the Company and the advisory group in its inaugural year.

To that end, PSE has coordinated with some members of the EAG to provide letters of support for the Company's request. These letters were filed on August 3, 2021. The letters echo the Company's stated rationale for this request – that more time would allow for more meaningful engagement and result in a CEIP which more fully countenances the concerns of the communities represented by EAG members.

Further, Staff agrees that the extra time will give PSE the opportunity to solicit, consider and implement feedback on the many components of the CEIP. For example, a group of stakeholders provided PSE and Staff a preliminary view on in-progress, draft comments related to the Company's proposed customer benefit indicators (CBIs) on July 28, 2021. This feedback is the type of input PSE needs to hone its CEIP.

Still, Staff notes that PSE's motion and petition do not offer much specificity regarding the tasks or activities PSE will engage in if this extension request is granted. In discussions with the Company, Staff understands that the Company will file an addendum to the CEIP Public Participation Plan filed in Docket UE-210297 by September 1, 2021, which will describe the Company's planned public engagement activities through the filing of the final CEIP in December. Staff encourages PSE to continue keeping its CEIP website up to date so that stakeholders can keep informed on what the Company is doing with the additional time requested, and to consider convening a joint advisory group workshop.

Stakeholder comments

Staff reached out to stakeholders tracking the Company's efforts with the CEIP. Some stakeholders filed comments to the docket, and others have informed staff of their intent, though these comments have not been filed as of the internal deadline for this memo. Aside from these stakeholders, listed below, those contacted by Staff expressed no concerns or objections to the Company's request.

James Adcock: Mr. Adcock, a participant with the Company's IRP advisory group, filed comments on July 27, 2021, recommending that the Commission reject the petition, characterizing the request as “the latest in a long string of ‘foot dragging’ ploys by PSE[.]”

Northwest Energy Coalition (NVEC) and Renewable Northwest (RNW): Staff understands that NVEC and RNW intend to file joint comments to this docket prior to the open meeting, and may be joined by other parties as well. These comments will likely propose certain conditions that could be adopted by the Commission as a part of its approval of PSE's request.

Washington Clean Energy Coalition (WCEC): WCEC has also informed Staff of their intent to file a letter regarding PSE's request.

Conclusion

Issue an order in Docket UE-210571 granting Puget Sound Energy's motion and petition filed on July 21, 2021, as described in Staff's recommendation.