Puget Sound Energy's May 8, 2025 Comments in Docket U-240281 (ISP Rulemaking) Attachment 1: Statutorily Required Contents of Electric IRPs, Gas IRPs, and CEIPs

Electric IRP (RCW 19.280.030)
(1) The [electric] integrated resource plan, at a minimum, must include:
(1)(a) A range of forecasts, for at least the next 10 years or longer, of projected customer
demand which takes into account econometric data and customer usage;
(1)(b) An assessment of commercially available conservation and efficiency resources, as
informed, as applicable, by the assessment for conservation potential under RCW 19.285.040
for the planning horizon consistent with (a) of this subsection. Such assessment may include,
as appropriate, opportunities for development of combined heat and power as an energy and
capacity resource, demand response and load management programs, and currently
employed and new policies and programs needed to obtain the conservation and efficiency
resources
(1)(c) An assessment of commercially available, utility scale renewable and nonrenewable
generating technologies including a comparison of the benefits and risks of purchasing
power or building new resources;
(1)(d) A comparative evaluation of renewable and nonrenewable generating resources,
including transmission and distribution delivery costs, and conservation and efficiency
resources using "lowest reasonable cost" as a criterion;
(1)(e) 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 utility's resource portfolio;
(1)(f) An assessment and 20-year forecast of the availability of and requirements for
regional generation and transmission capacity to provide and deliver electricity to the
utility's customers and to meet the requirements of chapter 288, Laws of 2019 and the
state's greenhouse gas emissions reduction limits in RCW 70A.45.020. The transmission
assessment must identify the utility's expected needs to acquire new long-term firm
rights, develop new, or expand or upgrade existing, bulk transmission facilities consistent
with the requirements of this section and reliability standards;
(1)(f)(i) If an electric utility operates transmission assets rated at 115,000 volts or greater,
the transmission assessment must take into account opportunities to make more effective
use of existing transmission capacity through improved transmission system operating practices, energy efficiency, demand response, grid modernization, nonwires solutions,
and other programs if applicable;
(1)(f)(ii) An electric utility that relies entirely or primarily on a contract for transmission
service to provide necessary transmission services may comply with the transmission
requirements of this subsection by requesting that the counterparty to the transmission
service contract include the provisions of chapter 288, Laws of 2019 and chapter 70A.45
RCW as public policy mandates in the transmission service provider's process for
assessing transmission need, and planning and acquiring necessary transmission capacity;
(1)(f)(iii) An electric utility may comply with the requirements of this subsection (1)(f)
by relying on and incorporating the results of a separate transmission assessment process,
conducted individually or jointly with other utilities and transmission system users, if that
assessment process meets the requirements of this subsection;
(1)(g) A determination of resource adequacy metrics for the resource plan consistent with the
forecasts;
(1)(h) A forecast of distributed energy resources that may be installed by the utility's
customers and an assessment of their effect on the utility's load and operations;

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(1)(j) The integration of the demand forecasts, resource evaluations, and resource adequacy
requirement into a long-range assessment describing the mix of supply side generating
resources and conservation and efficiency resources that will meet current and projected
needs, including mitigating overgeneration events and implementing RCW 19.405.030
through 19.405.050, at the lowest reasonable cost and risk to the utility and its customers,
while maintaining and protecting the safety, reliable operation, and balancing of its electric
system;
(1)(k) 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 vulnerable populations and highly impacted communities; long-term and short-term public
health and environmental benefits, costs, and risks; and energy security and risk;
(1)(1) A 10-year clean energy action plan for implementing RCW 19.405.030 through
19.405.050 at the lowest reasonable cost, and at an acceptable resource adequacy standard,
that identifies the specific actions to be taken by the utility consistent with the long-range
integrated resource plan; and
(1)(m) An analysis of how the plan accounts for:
(1)(m)(i) Modeled load forecast scenarios that consider the anticipated levels of zero
emissions vehicle use in a utility's service area, including anticipated levels of zero
emissions vehicle use in the utility's service area provided in RCW 47.01.520, if feasible;
(1)(m)(ii) Analysis, research, findings, recommendations, actions, and any other relevant
information found in the electrification of transportation plans submitted under RCW
35.92.450, 54.16.430, and 80.28.365; and
(1)(m)(iii) Assumed use case forecasts and the associated energy impacts. Electric
utilities may, but are not required to, use the forecasts generated by the mapping and
forecasting tool created in RCW 47.01.520. This subsection (1)(m)(iii) applies only to
plans due to be filed after September 1, 2023.
(2) The clean energy action plan [from above] must:
(2)(a) Identify and be informed by the utility's 10-year cost-effective conservation potential
assessment as determined under RCW 19.285.040, if applicable;
(2)(b) Establish a resource adequacy requirement;
(2)(c) Identify the potential cost-effective demand response and load management programs
that may be acquired;
(2)(d) 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 utility's resource adequacy requirement;
(2)(e) Identify any need to develop new, or expand or upgrade existing, bulk transmission
and distribution facilities and document existing and planned efforts by the utility to make
more effective use of existing transmission capacity and secure additional transmission
capacity consistent with the requirements of subsection (1)(f) of this section; and
(2)(f) Identify the nature and possible extent to which the utility may need to rely on $1 + 1 + 1 = 1 + 1 = 1 + 1 = 1 + 1 = 1 = $
alternative compliance options under RCW 19.405.040(1)(b), if appropriate.
Gas IRP (No Statute)
None.

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CEIP (RCW 19.405.060)
(1)(a) [Each investor-owned utility CEIP must include:]
(1)(a)(i) A four-year clean energy implementation plan for the standards established under
RCW 19.405.040(1) and 19.405.050(1) that proposes specific targets for energy efficiency,
demand response, and renewable energy
(1)(a)(ii) Proposed interim targets for meeting the standard under RCW 19.405.040(1)
during the years prior to 2030 and between 2030 and 2045.
(1)(b) An investor-owned utility's clean energy implementation plan must:
(1)(b)(i) Be informed by the investor-owned utility's clean energy action plan developed
under RCW 19.280.030;
(1)(b)(ii) Be consistent with subsection (3) of this section; and
(1)(b)(iii) Identify specific actions to be taken by the investor-owned utility over the next
four years, consistent with the utility's long-range integrated resource plan and resource
adequacy requirements, that demonstrate progress toward meeting the standards under RCW
19.405.040(1) and 19.405.050(1) and the interim targets proposed under (a)(i) of this
subsection. The specific actions identified must be informed by the investor-owned utility's
historic performance under median water conditions and resource capability and by the
investor-owned utility's participation in centralized markets. In identifying specific actions in
its clean energy implementation plan, the investor-owned utility may also take into
consideration any significant and unplanned loss or addition of load it experiences.