

Agenda Date: April 13, 2017  
Item Numbers: A1 and A2

**Dockets: UE-160918 and UG-160919**  
Company: Puget Sound Energy

Staff: David Nightingale, Senior Regulatory Engineering Specialist  
Jennifer Snyder, Regulatory Analyst

### **Recommendation**

Issue an order extending the deadlines for submittal of Puget Sound Energy’s electric and gas Integrated Resource Plans from July 14, 2017, to November 14, 2017, in Dockets UE-160918 and UG-160919 pursuant to WAC 480-07-110.

### **Discussion**

On March 31, 2017, Puget Sound Energy (PSE) filed a petition in Dockets UE-160918 and UG-160919 to extend the deadline for submission of their gas and electric Integrated Resource Plans (IRPs) from July 14, 2017, to November 14, 2017. A revised petition was filed on April 7, 2017.

Pursuant to WAC 480-07-110, the Utilities and Transportation Commission (commission) has the authority to grant a petition for exemptions to its rules. WAC 480-07-110 is directly referenced for the chapter governing filing requirements for gas IRPs at WAC 480-90-008 and for electric IRPs at WAC 480-100-008. The commission may grant petitions for exemptions or modify application of its rules in individual cases if such petitions are “consistent with the public interest, the purposes of underlying regulations, and applicable statutes.”<sup>1</sup>

PSE discussed the petition to extend the IRP filing date with its IRP Advisory Group on March 13, 2017, and there were no objections to the time extension. PSE discussed the need and merits of the time extension with staff prior to filing its petition.

### **PSE Petition Request**

PSE’s petition cites additional tasks including more in-depth renewable energy resources evaluation, more detailed transmission project discussion, application of different discount rates to conservation resources, greenhouse gas marginal cost abatement, additional tipping point analyses, and other specific deliverables not originally in its work plan.

CENSE.org filed a letter with the commission dated March 30, 2017, stating that if an IRP time extension is granted by the commission, PSE should include additional project-specific transmission discussion in the IRP. Staff discussed this with PSE and it is included in the list of deliverables in the revised PSE petition.

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<sup>1</sup> WAC 480-07-110(1).

Completion of these additional tasks cannot be reasonably accomplished without additional time and resources applied by PSE. Staff has determined that a time extension would be consistent with the underlying intent of the applicable rules and statutes. Furthermore, it is in the public interest to extend the deadline for PSE's 2017 IRP as it will provide additional information and analysis for the IRP advisory group and allow PSE to make more informed choices in evaluating least-cost portfolio resources. Consequently staff supports granting the petition as filed, and recommends that the commission enter an order to that effect.

### **Conclusion**

Issue an order extending the deadlines for submittal of Puget Sound Energy's electric and gas Integrated Resource Plans from July 14, 2017, to November 14, 2017, in Dockets UE-160918 and UG-160919 pursuant to WAC 480-07-110.