

Puget Sound Energy
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Filed Via Web Portal

Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Re: In the Matter of Puget Sound Energy’s Petition for an Order Extending Filing and Reporting Requirements under RCW 19.405.060 and 19.280.030, an Exemption from the Requirements of WAC 480-90-238(4), 480-100-640(1) and 480-100-655(2), and Requiring the Filing of an Integrated System Plan Dockets UE-24____ and UG-24____

Dear Director Killip,

Enclosed for filing is the *Petition of Puget Sound Energy for an Order Extending Filing and Reporting Requirements under RCW 19.405.060 and 19.280.030, an Exemption from the Requirements of WAC 480-90-238(4), 480-100-640(1) and 480-100-655(2), and Requiring the Filing of an Integrated System Plan* (the Petition). PSE is filing this Petition pursuant to Section 3(3) of the Washington Decarbonization Act for Large Combination Utilities (Large Combination Utilities Decarbonization Act).¹

Section 3(3) of the Large Combination Utilities Decarbonization Act provides that the Washington Utilities and Transportation Commission (Commission) may extend the filing and reporting requirements in RCW 19.405.060 and 19.280.030 if the requesting utility demonstrates that it has made reasonable progress toward meeting the standards under RCW 19.405.040(1) and 19.405.050(1) as well as achieving equity goals. As set forth in the Petition, a Commission order granting the Petition is warranted because PSE’s Planning Transition Work Plan, included as Attachment A, demonstrates that PSE has made and plans to continue making reasonable progress towards meeting these standards and achieving equity goals.

PSE respectfully requests that this matter be taken up at the Open Meeting scheduled for June 27 and requests consideration and granting of the Petition by July 1, 2024. PSE has a Resource Planning Advisory Group (RPAG) meeting scheduled for July 17 for which the current schedule anticipates discussing 2025 Gas IRP scenarios. If the Commission grants this Petition, RPAG members and PSE would repurpose that meeting to an Integrated System Plan kick-off meeting, thus making efficient use of everyone’s resources. Granting the Petition by July 1 is critical to ensuring that implementation of the Large Combination Utilities Decarbonization Act begins

¹ Large Combination Utilities Decarbonization Act, Engrossed Substitute House Bill 1589, § 3(3) (2024).

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successfully. Any delay jeopardizes PSE's ability to begin collaborative discussions with the Commission, RPAG members, other interested parties, and customers regarding the new Integrated System Plan required by January 1, 2027.

Denial of the Petition would prove even more challenging, as neither PSE nor the Commission and staff could meaningfully complete and review all of the otherwise-required legacy planning processes while simultaneously participating in the required rulemaking proceeding and preparing an Integrated System Plan by 2027. Similarly, duplicative processes would make engagement by interested parties and customers exceptionally complicated, confusing, and unnecessarily burdensome.

Granting the Petition is therefore in the public interest, as it will reduce regulatory barriers to achieving the planning transition, maximize resources of all parties, achieve equitable and transparent outcomes, allow for the robust engagement with interested parties and customers, and ensure adequate time needed to transition to the integrated system planning process required by the Large Combination Utilities Decarbonization Act.

Included with this filing are the following documents:

- The Petition;
- Attachment A: PSE's Planning Transition Work Plan; and
- Attachment B: Clean Energy Implementation Plan Conditions and Status.

If you any questions, please contact me at 425-462-3051.

Sincerely,

/s/ Wendy Gerlitz

Wendy Gerlitz
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Attachments:

Petition for Extension

Attachment A - PSE's Planning Transition Work Plan

Attachment B - Clean Energy Implementation Plan Conditions and Status