

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	DOCKETS UG-141169
)	UE-141170
PUGET SOUND ENERGY,)	
)	ORDER 02
Petitioner,)	
)	
Seeking Temporary Exemption from)	ORDER GRANTING
the Provisions of WAC 480-90-238(4))	TEMPORARY
and WAC 480-100-238(4) Relating to)	EXEMPTION FROM RULE
the Timing of Integrated Resource)	
Plan Filings)	
)	
.....)	

BACKGROUND

- 1 On July 31, 2015, Puget Sound Energy (PSE or Company) filed with the Washington Utilities and Transportation Commission (Commission) a petition requesting an exemption from WAC 480-90-238(4) and WAC 480-100-238(4). The petition requests a one-time extension of the filing date for the 2015 Integrated Resource Plan (IRP) from September 30, 2015, to November 30, 2015.
- 2 WAC 480-90-238(4) and WAC 480-100-238(4) require natural gas and electric companies, respectively, to submit an IRP within two years of the date of its previous filing. PSE combines its natural gas and electric analysis in a single IRP.
- 3 PSE previously requested, and the Commission granted, an extension of the 2015 IRP filing date from May 30, 2015, to September 30, 2015, to accommodate revisions to the company’s load forecasting methodology. At the same time, the Commission granted a permanent modification of its IRP filing date to July 15, starting in 2017.
- 4 In its petition, PSE explains that it has updated the analytical framework for determining electric resource needs in the 2015 IRP, in order to align its resource adequacy analysis with the Northwest Power and Conservation Council’s resource adequacy analysis. This analysis assesses the Company’s exposure to capacity shortfalls due to shortfalls in the regional wholesale market beginning in 2021. PSE states that integrating its models with the region’s model and updating the load forecasting methodology each proved more time consuming than anticipated.

- 5 Staff expects that an extension of the 2015 IRP filing date will also provide PSE with additional time to complete its flexibility analysis, which explores the value of intra-hour redispatch for energy storage and flexible natural gas resources. This analysis is an initial attempt to quantify storage benefits other than arbitrage. Staff believes that the resource adequacy and flexibility analysis are important elements of the 2015 IRP that will provide useful context for the Company's resource acquisition decisions. Therefore, Staff views granting an exemption as serving the public interest and the underlying purpose of the IRP rule.
- 6 PSE has committed to filing a draft 2015 IRP by September 23, 2015, to provide two months for public review and comment before filing the final 2015 IRP. The delay in filing the 2015 IRP was discussed with the Commission's regulatory staff (Staff) and PSE's IRP Advisory Group.
- 7 Staff recommends granting PSE's request for a temporary exemption from WAC 480-90-238(4) and WAC 480-100-238(4), thereby allowing the Company to file its 2015 IRP by November 30, 2015.

FINDINGS AND CONCLUSIONS

- 8 (1) The Washington Utilities and Transportation Commission is an agency of the State of Washington vested by statute with the authority to regulate rates, rules, regulations, practices, accounts, securities, transfers of property and affiliated interests of public service companies, including gas and electric companies. RCW 80.01.040, RCW 80.04, RCW 80.08, RCW 80.12, RCW 80.16 and RCW 80.28.
- 9 (2) Puget Sound Energy is engaged in the business of providing natural gas and electric services within the state of Washington and is a public service company subject to Commission jurisdiction.
- 10 (3) Puget Sound Energy is subject to WAC 480-90-238(4) and WAC 480-100-238(4), which require natural gas and electric companies, respectively, to submit an IRP within two years after the date on which the previous plan was filed with the Commission. The Commission previously established July 15, 2017, as the filing date for its next IRP.

- 11 (4) Puget Sound Energy requests an exemption from WAC 480-90-238(4) and WAC 480-100-238(4) to change the filing date of its 2015 IRP from September 30, 2015, to November 30, 2015.
- 12 (5) Under WAC 480-90-008 and WAC 480-100-008, the Commission may grant an exemption from the provisions of any rule in WAC 480-90 and WAC 480-100, if consistent with the public interest, the purposes underlying regulation and applicable statutes.
- 13 (6) This matter came before the Commission at its regularly scheduled meeting on August 27, 2015.
- 14 (7) After reviewing Puget Sound Energy's petition filed in Dockets UG-141169 and UE-141170 on July 31, 2015, and giving due consideration, the Commission finds that the exemption is reasonable, in the public interest, and therefore should be granted.

ORDER

THE COMMISSION ORDERS:

- 15 (1) After the effective date of this Order, Puget Sound Energy's request for a temporary exemption from WAC 480-90-238(4) and WAC 480-100-238(4) is granted, allowing Puget Sound Energy to file its 2015 Integrated Resource Plan on or before November 30, 2015.
- 16 (2) The Commission retains jurisdiction over the subject matter and Puget Sound Energy to effectuate the provisions of this Order.

The Commissioners, having determined this Order to be consistent with the public interest, directed the Secretary to enter this Order.

DATED at Olympia, Washington, and effective August 27, 2015.

WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

STEVEN V. KING, Executive Director and Secretary