

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PUGET SOUND ENERGY

**FOR AN ORDER EXTENDING FILING
AND REPORTING REQUIREMENTS**

**DOCKETS UE-24____
UG-24____**

**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-
2328(4), 480-100-640(1) & 480-100-655(2),
AND REQUIRING THE FILING OF AN
INTEGRATED SYSTEM PLAN**

I. INTRODUCTION AND RELIEF REQUESTED

I. The Washington Decarbonization Act for Large Combination Utilities (the “Large Combination Utilities Decarbonization Act”)¹ provides that, upon request, the Washington Utilities and Transportation Commission (“Commission”) may consolidate a large combination utility’s planning requirements for both gas and electric operations into a single integrated system plan approved by the Commission. Additionally, WAC 480-07-110 permits a utility to request an exemption from Commission rules. Accordingly, Puget Sound Energy (“PSE”) respectfully requests that the Commission:

- Issue an order extending the filing and reporting requirements² for the

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

² While PSE is not required to file an electrification of transportation plan, *see* RCW 80.28.360 (noting that an electrification of transportation plan is voluntary), PSE nevertheless would like to provide notice to the Commission that PSE intends to incorporate the electrification of transportation plan into the 2027 ISP and does not intend to file another electrification of transportation plan in the interim.

following PSE's legacy planning documents:

- Gas Integrated Resource Plan,
- Electric Integrated Resource Plan,
- Clean Energy Implementation Plan, and
- Clean Energy Implementation Plan Public Participation Plan, and
- Order PSE to file an Integrated System Plan by January 1, 2027.

2. As discussed below, the extension and order is warranted because PSE's Planning Transition Work Plan ("Work Plan"), attached as Attachment A, and PSE's CEIP Conditions and Status document, attached as Attachment B, demonstrate reasonable progress towards meeting the standards under RCW 19.405.040(1) and 19.405.050(1) and achieving equity goals. Moreover, consolidating PSE's planning requirements for gas and electric obligations will reduce regulatory barriers, conserve this Commission's resources, achieve equitable and transparent outcomes, and integrate planning requirements.

3. An extension order is also warranted under WAC 480-07-110 for PSE's gas IRP and CEIP public participation plan to allow PSE to better align and integrate these plans with other legacy planning documents required under RCW 19.405.060 and 19.280.030, which is consistent with the public interest, the purposes underlying the regulation, and applicable statutes.³

4. Statute and rules at issue in this Petition include the Large Combination Utility Decarbonization Act, RCW 19.280.030, 19.285.040, ch. 19.405 RCW, ch. 80.28 RCW, ch. 480-07 WAC; .ch. 480-100 WAC, ch. 480-90 WAC.

5. PSE is engaged in the business of providing electric and gas service within the

³ WAC 480-07-110(1).

State of Washington as a public service company and is subject to the regulatory authority of the Commission. Its full name and mailing address for the purpose of this Petition for Extension are:

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II. BACKGROUND FACTS

6. PSE has and continues to be an early leader in transitioning to clean energy. Over the past five years, PSE's commitment to reducing greenhouse gas ("GHG") emissions and implementing affordable clean energy solutions has only strengthened with the passage of several climate-oriented laws: the Climate Commitment Act ("CCA"),⁴ the Clean Energy Transformation Act ("CETA"),⁵ and the Large Combination Utilities Decarbonization Act.

A. The CCA⁶ and CETA Set Aggressive Emission Reduction Goals

⁴ Ch. 70A.45 RCW.

⁵ Ch. 19.405 RCW.

⁶ On May 17, 2021, Governor Jay Inslee signed the CCA, into law, which directed the Washington State Department of Ecology to adopt and implement a comprehensive market-based mechanism to reduce greenhouse gas emissions from large emitters. The CCA was enacted to help meet the Legislature's GHG emissions reduction targets to 45 percent below 1990 levels by 2030, 70 percent below 1990 levels by 2040, and 95 percent below 1990 levels, as well as net-zero emissions by 2050. RCW 70A.45.020(1)(a).

7. In 2019, the Washington State Legislature passed CETA, which directs electric utilities to meet 100 percent of their retail electric load using non-emitting and renewable resources by January 1, 2045.⁷ In addition, CETA requires utilities to eliminate coal-fired resources by December 31, 2025,⁸ and to make all retail sales of electricity GHG neutral by January 1, 2030.⁹ As part of meeting those goals, the Legislature also required all investor-owned utilities to develop and submit Clean Energy Implementation Plans (“CEIP”), which must be informed by a Clean Energy Action Plan (“CEAP”).¹⁰ In CETA, the Legislature added the CEAP as one component of an integrated resources plan (“IRP”). PSE must submit its IRP to the Commission as established by Commission rules.¹¹

8. The Commission subsequently adopted rules implementing CETA in General Order 601 of Dockets UE-191023 and UE-190698. The rules require PSE to file an electric IRP by January 1, 2021, and every four years thereafter.¹² The Commission also adopted rules requiring a utility to submit progress reports every two years.¹³

9. On April 1, 2021, pursuant to Commission Order 02 in Dockets UE-180607 and UG-180608, PSE filed its IRP¹⁴ and subsequently filed its two-year electric progress report on March 31, 2023.¹⁵

⁷ RCW 19.405.050(1).

⁸ RCW 90.405.030(1).

⁹ RCW 90.405.040(1).

¹⁰ RCW 90.405.060(1)(b)(i); RCW 19.280.030.

¹¹ WAC 480-100-625; WAC 480-90-238.

¹² WAC 480-100-625(1).

¹³ *In the Matter of Adopting Rules Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act*, Dockets UE-191023 and UE-190698 (consolidated), General Order 601 Adopting Rules Permanently at ¶¶ 169-70 (Dec. 28, 2020); *see also* WAC 480-90-238(4) (requiring a gas utility to submit an IRP every two years).

¹⁴ *In the Matter of Commission Staff’s Petition for an Order Granting Exemption from the Requirements of WAC 480-100-238(4)-(5) and WAC 480-90-238(4)-(5)*, Order 02 Granting Petition (Nov. 7, 2019).

¹⁵ *In the Matter of Puget Sound Energy’s 2023 Electric Integrated Resource Plan Progress Report*, Docket UE-200304 (Mar. 31, 2020).

10. Additionally, in December of 2021, PSE filed its first CEIP (the “2021 CEIP”), which the Commission approved with conditions, on June 6, 2023.¹⁶ On November 1, 2023, PSE filed its Biennial CEIP Update to the 2021 CEIP (the “Biennial CEIP Update”).¹⁷ The Biennial CEIP Update provided updated goals, targets, and addressed the conditions associated with the 2021 CEIP’s approval.¹⁸ On March 25, 2024, the Commission approved the Biennial CEIP Update, subject to conditions.¹⁹

B. The Large Combination Utilities Decarbonization Act Seeks to Alleviate Regulatory Burdens and Promote Equity

11. In passing the Large Combination Utilities Decarbonization Act, the legislature recognized that the regulatory processes required by CCA and CETA, when combined with already-existing regulatory processes and requirements, may pose an obstacle to “timely and cost-effective decarbonization”.²⁰ The Large Combination Utilities Decarbonization Act acknowledged that large combination utilities must direct more resources towards decarbonization of residential and commercial heating and other loads while simultaneously protecting all customers, and highly impacted and overburdened communities in particular.²¹

12. The Large Combination Utilities Decarbonization Act also recognized that the energy transition does not happen in a vacuum. In order for large combination utilities to decarbonize their systems, they must transition customers, invest in energy supply, continue to serve current, and allow for future, customers, maintain the existing systems’ safety and

¹⁶ *In the Matter of Puget Sound Energy Clean Energy Implementation Plan Pursuant to WAC 480-100-640*, Docket UE-210795, Order 08 Approving CEIP Subject to Conditions (Jun. 6, 2023).

¹⁷ *In the Matter of Puget Sound Energy Clean Energy Implementation Plan Pursuant to WAC 480-100-640*, Docket UE-210795 (Nov. 1, 2023).

¹⁸ *Id.*

¹⁹ *In the Matter of Puget Sound Energy Clean Energy Implementation Plan Pursuant to WAC 480-100-640*, Docket UE-210795, Order 12 Approving CEIP Biennial Update Subject to Conditions (Mar. 25, 2024).

²⁰ Large Combination Utilities Decarbonization Act § 3(1).

²¹ *Id.* § 1(5).

reliability, manage peak load, and ensure equitable benefits to historically overburdened and underserved communities.²² The Legislature adopted “requirements for large combination utilities to conduct integrated system planning to develop specific actions supporting gas system decarbonization and electrification, and reduction in the gas rate base.”²³ Accordingly, the Commission may permit a large combination utility to consolidate its planning requirements for both gas and electric operations, including consolidation into a single integrated system plan that is approved by the Commission.²⁴

13. To support the filing of an ISP and reduce regulatory burdens, a large combination utility can request that the Commission issue an order extending the filing and reporting requirements of a large combination utility under RCW 19.405.060²⁵ and 19.280.030²⁶ provided that the large combination utility can demonstrate reasonable progress toward meeting the standards under RCW 19.405.040(1) and 19.405.050(1) as well as achieving equity goals. PSE plans to incorporate its CEIP, CEIP public participation plan, gas IRP, electric IRP, and electrification of transportation plan into its ISP that will be filed in 2027 consistent with any forthcoming rules from the Commission.

III. PSE’S PETITION FOR EXTENSION

14. Pursuant to Commission order in Docket UE-230966, PSE must file its next electric IRP by March 31, 2025, with a draft IRP due November 30, 2024,²⁷ and must also file its

²² *Id.*

²³ *Id.* § 1(6).

²⁴ *Id.* § 3(1).

²⁵ Requiring the filing of a CEIP.

²⁶ Requiring the filing of an electric IRP.

²⁷ *In the Matter of the Petition of Puget Sound Energy Seeking Exemption from the Provisions of WAC 480-100-625 Relating to Integrated Resource Planning Timing*, Docket UE-230966, Order 01 Granting Exemption from Rule (Dec. 21, 2023); *see also* WAC 480-100-625(3), PSE’s Draft 2025 IRP is due “no later than four months prior to the due date of the final IRP.”

natural gas IRP by March 31, 2025.²⁸ Additionally, PSE is required to file its CEIP by October 1, 2025,²⁹ and a CEIP public participation plan by May 1, 2025.³⁰ PSE also intends to file an electrification of transportation plan in 2026.³¹ PSE seeks an extension of the CEIP and electric IRP as required by RCW 19.405.060 and 19.280.030, respectively, and the natural gas IRP and public participation plan that are required by Commission rule.³²

15. As explained below, PSE’s Work Plan demonstrates that PSE has made and will continue to make reasonable progress towards CETA requirements³³ as well as demonstrates a firm commitment to achieving equity, as required by the Large Utilities Decarbonization Act,³⁴ and aligning the natural gas IRP and public participation plan with the electric IRP and CEIP would be in the public interest,³⁵ and the Commission should grant this Petition.

A. PSE Has Made “Reasonable Progress” Towards its General CETA Obligations to Date

16. PSE has made “reasonable progress” in implementing CETA’s obligations as described in more detail in Attachment B, which details PSE’s progress for each condition in the 2021 CEIP Order³⁶ and the 2023 Biennial Update Order.³⁷ Under CETA all retail electric load must be GHG neutral by 2030, and by January 2045, all retail load must be supplied by clean

²⁸ WAC 480-90-238(4) (“each natural gas utility must submit a plan within two years after the date on which the previous plan was filed with the Commission”).

²⁹ WAC 480-100-640(1) (“each electric utility must file with the commission a CEIP by October 1, 2021, and every four years thereafter.”).

³⁰ WAC 480-100-655(2) (On or before May 1st of each odd-numbered year, the utility must file with the commission a plan that outlines its schedule, methods, and goals for public participation and education both during the development of the CEIP and throughout the implementation of the plan.”).

³¹ See *supra* fn.2.

³² WAC 480-90-238(4), WAC 480-100-640(1) & 480-100-655(2).

³³ § 3(1)

³⁴ RCW 19.405.040(1) & 19.405.050(1).

³⁵ WAC 480-07-110

³⁶ *In the Matter of Puget Sound Energy Clean Energy Implementation Plan Pursuant to WAC 480-100-640*, Docket UE-210795, Order 08 Approving CEIP Subject to Conditions (Jun. 6, 2023).

³⁷ *In the Matter of Puget Sound Energy Clean Energy Implementation Plan Pursuant to WAC 480-100-640*, Docket UE-210795,, Order 12 Approving CEIP Biennial Update Subject to Conditions (Mar. 25, 2024).

energy.³⁸ As demonstrated in the Work Plan, electric loads are growing considerably since the 2021 CEIP and PSE expects to deliver significantly more megawatt-hours (MWh) of clean energy than originally projected for 2025 and has procured or signed long-and short-term agreements totaling nearly 5 million MWh per year and is seeking to procure an additional 5 million more MWh in executing deals in 2024.³⁹ While PSE’s current target is 63 percent clean energy by 2025, that percentage should stay the same for 2026 and 2027 for several reasons.

17. First, there are significant delays in clean energy resource development such as interconnection and transmission issues and supply chain concerns.⁴⁰ Many projects solicited via the All Source Request for Proposals (“RFP”) process have had delayed commercial operation dates.⁴¹ While the Commission in its Order approving the Biennial CEIP Update maintained the 63 percent target for 2025, the Commission also stated that it would consider whether PSE would have had to purchase unreasonably costly energy when reviewing PSE’s compliance with the interim targets.⁴² As discussed in more detail in the Work Plan, PSE is actively considering potential clean energy resources to meet the 63 percent target; however, many of those resources will have in-service dates outside of the 2022-2025 CETA compliance period and beyond to at least 2028, or may be unreasonably costly if procured through short-term markets.⁴³

18. Not only are there significant delays, there are significant resource constraints

³⁸ RCW 19.405.050(1).

³⁹ Planning Transition Work Plan at 3.

⁴⁰ *Id.* at 4–5; see also *In the Matter of Puget Sound Energy Clean Energy Implementation Plan Pursuant to WAC 480-100-640*, Docket UE-210795,, Order 12 Approving CEIP Biennial Update Subject to Conditions (Mar. 25, 2024).

⁴¹ Planning Transition Work Plan at 4–5.

⁴² *In the Matter of Puget Sound Energy Clean Energy Implementation Plan Pursuant to WAC 480-100-640*, Docket UE-210795,, Order 12 Approving CEIP Biennial Update Subject to Conditions (Mar. 25, 2024); *accord* WAC 480-90-238 (stating that a reasonable cost analysis “must consider resource costs, market-volatility risks, demand-side resource uncertainties, the risks imposed on ratepayers, resource effect on system operations, public policies regarding resource preference adopted by Washington state or the federal government, the cost of risks associated with environmental effects including emissions of carbon dioxide, and the need for security of supply.”).

⁴³ Planning Transition Work Plan at 5.

with limited clean energy availability across the region. Additionally, to date, PSE has been able to meet CETA targets by adding clean energy when it is readily available, but as PSE's CETA compliance obligation grows, PSE must also contend with increasing capacity needs to reliably serve customers. PSE must serve its customers and given the lack of available CETA-eligible capacity in the area, the costs of procuring and acquiring eligible resources are substantial.⁴⁴

19. When considering the totality of the circumstances, including the challenges regarding acquiring CETA-eligible resources, as well as addressing capacity needs, PSE has made reasonable progress towards CETA goals to date and the annual interim targets of 63 percent for 2026 and 2027 represent reasonable progress.

B. PSE's Work Plan Demonstrates "Reasonable Progress" Towards Meeting CETA's Clean Energy Objectives

20. PSE continues to make substantial progress in expanding existing programs and growing new clean energy programs to meet CETA's objectives. In its 2021 CEIP, and later updated in the Biennial CEIP Update, PSE proposed specific targets for (1) renewable energy, (2) demand response, (3) solar distributed energy resources, (4) storage distributed energy resources, and (5) energy efficiency.⁴⁵ A thorough discussion of each of these targets is in the Work Plan but highlights include the following:

21. PSE proposes renewable energy specific targets of 62.5 percent for 2026 and 2027, which aligns with Condition 3 of the Commission's Order 12.⁴⁶ Because of the challenges described in Section PSE Has Made "Reasonable Progress" Towards its General CETA Obligations to Date above, PSE is not seeking to increase the renewable energy specific target

⁴⁴ *Id.* at 6.

⁴⁵ Planning Transition Work Plan at 7.

⁴⁶ *Id.* at 9; *In the Matter of Puget Sound Energy Clean Energy Implementation Plan Pursuant to WAC 480-100-640*, Docket UE-210795,, Order 12 Approving CEIP Biennial Update Subject to Conditions (Mar. 25, 2024).

for 2026 and 2027 but intends to maintain its progress to date.

22. PSE has scaled up its demand response portfolio and for the 2023-2024 season, PSE had seven demand response events and PSE curtailed 32 MW.⁴⁷ For 2026 and 2027, PSE has increased its demand response targets to 149 MW and 164 MW, respectively. PSE is also working with AutoGrid to design and implement a functional Virtual Power Plant.⁴⁸

23. PSE is working to meet its Commission approved targets of 80 MW for solar distributed energy resources and 25 MW for storage distributed energy resources by 2025.⁴⁹ PSE plans to spend the remainder of the 2022-2025 CETA compliance period to meet these targets.⁵⁰ The new targets, which are in line with modeling from PSE's 2023 Electric Progress Report, are 110 MW and 140 MW for solar distributed energy resources and 50 MW and 75 MW for storage distributed energy resources, for years 2026 and 2027 respectively.⁵¹

24. PSE will work with the Conservation Resource Advisory Group and the Commission in 2024 and 2025 to prepare the next Biennial Conservation Plan, to be filed in November 2025.⁵² PSE is not seeking an extension of time to file this Plan. This plan will cover energy efficiency targets for 2026 and 2027.⁵³

C. PSE's Work Plan Incorporates the Four Tenets of Energy Justices Outlined by the Commission

25. The Commission's order in Docket UG-210755⁵⁴ outlined the four tenets of energy justice: recognition, procedural, distributional, and restorative justice. PSE has followed

⁴⁷ Planning Transition Work Plan at 8-9.

⁴⁸ *Id.* at 9.

⁴⁹ *Id.*

⁵⁰ *Id.* at 10.

⁵¹ *Id.*

⁵² *Id.*

⁵³ *Id.*

⁵⁴ *Wash. Util. Transp. Comm'n v. Cascade Natural Gas Corp.*, Docket UG-210755, Order 09 (Aug. 23, 2022).

the Commission’s guidance and used this framework to outline actions that PSE plans to take in 2026 and 2027:

26. *Recognition justice*-PSE has identified, defined, and mapped Named Communities and has identified and tracked disparities in the clean energy system.⁵⁵ In order to further recognition justice, PSE intends to refine its approach to customers in Deepest Need; and complete its current energy burden analysis, which will inform actions for 2026 and 2027.⁵⁶

27. *Procedural justice*-PSE has developed the Distributed Energy Resources Public Engagement “Empowerment” Pilot, which aims to engage customers in named communities at the “empowerment” level.⁵⁷ This work builds upon PSE’s intensive and successful engagement efforts in 2022 and 2023, working directly with customers in named communities to understand barriers and develop new customer programs.⁵⁸ PSE also plans to work with its various advisory groups on topics of engagement such as transmission planning, planning for the 2027 ISP, equity targets, and changes in light of the Large Combination Utility Decarbonization Act, as well as continue its public engagement efforts and the CEIP Customer Education and Awareness Program.⁵⁹

28. *Distributional justice*- PSE has incorporated energy equity considerations in its distribution system planning and corporate capital planning process so that historically marginalized and vulnerable populations are not disproportionately burdened or excluded from access to benefits.⁶⁰ PSE has worked with Lawrence Berkeley National Lab to develop a

⁵⁵ Planning Transition Work Plan at 12.

⁵⁶ *Id. see also In the Matter of Puget Sound Energy Clean Energy Implementation Plan Pursuant to WAC 480-100-640, Docket UE-210795,, Order 12 Approving CEIP Biennial Update Subject to Conditions (Mar. 25, 2024) (Condition 2).*

⁵⁷ Planning Transition Work Plan at 13.

⁵⁸ Community Engagement Summary, Distributed Energy Resources (DER) Batteries, Solar and Demand Response

⁵⁹ *Id.*

⁶⁰ *Id.*

Distributional Equity Analysis pilot that will help PSE enhance traditional cost-effectiveness for distributed energy resources while incorporating distributional equity.⁶¹ PSE plans to publish the Distributional Equity Analysis in 2024. PSE has also developed an equity questionnaire as a method to consider equity in resource acquisitions and future Requests for Proposals.⁶² PSE also intends to use Customer Benefit Indicator metrics to measure how customers benefit from the CETA transition and measure progress overtime.⁶³ PSE continues to refine these indicators. PSE proposes a 30 percent minimum energy benefit designated for named communities, as ordered by Order 08, Condition 20 and continues to improve program implementation and design to meet this minimum designation requirement.⁶⁴

29. *Restorative justice*-In furtherance of restorative justice, PSE is committed to continuing to participate in the Commission's equity docket (A-230217); ensuring decisions across PSE incorporate energy equity; and continuing to work to achieve at least 30 percent minimum energy benefits flow to named communities.⁶⁵

30. PSE has and continues to keep energy equity at the forefront of planning, designing, and implementing clean energy programs and resources.

D. Aligning the Timing of the Natural Gas IRP and CEIP Public Participation Plan is in the Public Interest.

31. PSE has shown impressive progress with regards to its CETA obligations and promoting equity, and therefore it would be in the public interest to further align other legacy planning documents into the timing of the ISP. Pursuant to WAC 480-07-110, the Commission

⁶¹ *Id.* at 14.

⁶² *Id.*

⁶³ Planning Transition Work Plan at 14. *see also In the Matter of Puget Sound Energy Clean Energy Implementation Plan Pursuant to WAC 480-100-640*, Docket UE-210795, Order 12 Approving CEIP Biennial Update Subject to Conditions (Mar. 25, 2024) (Condition 2).

⁶⁴ *Id.*

⁶⁵ *Id.* at 17.

may, “in response to a request or on its own motion, grant an exemption from its own rules when consistent with the public interest, the purposes underlying regulation, and applicable statutes.”

32. As an initial matter, incorporating these documents into the ISP serves the purposes of the Large Combination Utilities Decarbonization Act, which recognizes meeting the CCA’s and CETA’s goals “will require careful and integrated planning”⁶⁶ and that the “current natural gas integrated resources plans under development might not yield optimal results for timely and cost-effective decarbonization.”⁶⁷ Accordingly, the Commission has the authority to “consolidate a large combination utility’s planning requirements for both *gas and electric operations*, including consolidation into a single integrated system plan.”⁶⁸ To require PSE to file these two documents separate from the 2027 ISP would work at cross purposes with the Legislature’s directive to streamline utility system planning in order to help achieve the CCA and CETA’s complex goals.

33. As the Legislature directed, by July 1, 2025, the Commission is required to complete a rulemaking proceeding to implement consolidated planning requirements for large combination utilities.⁶⁹ Since the natural gas IRP and the CEIP public participation plan are both planning documents required for large combination utilities, PSE anticipates these documents may be addressed in the Commission’s pending rulemaking.⁷⁰

34. Not only will an exemption be consistent with the Large Combination Utilities Decarbonization Act and reduce the regulatory burden on PSE, it will also reduce the regulatory burden on the Commission and interested parties by avoiding the inconvenience of having PSE

⁶⁶ *Id.* § 1(4).

⁶⁷ *Id.* § 3(1).

⁶⁸ *Id.*

⁶⁹ *Id.* § 3(2)(a).

⁷⁰ *See* WSR 24-11-050, CR-101, Preproposal Statement of Inquiry (notice of possible rulemaking pursuant to the Large Utility Decarbonization Act).

submit separate documents in close succession. An exemption will allow PSE more time to incorporate public comments and feedback from the public participation process and inform the ISP.

IV. CONCLUSION

35. For the foregoing reasons, PSE respectfully request that the Commission issue an order extending the filing and reporting requirements of a large combination utility under RCW 19.405 and 19.280.030, and require PSE to file an integrated system plan.

DATED this 5th day of June 2024

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