EXH. EAS-8
DOCKETS NOS. UE-260005/UG-260006
2026 PSE GENERAL RATE CASE
WITNESS: ELIZABETH A. STANTON

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, **Complainant,** **v.** **PUGET SOUND ENERGY,** **Respondent.**	DOCKET NOS. UE-250005 and UG-260006 *(Consolidated)*

EXHIBIT EAS-8 (NONCONFIDENTIAL) TO THE RESPONSE TESTIMONY OF

ELIZABETH A. STANTON

ON BEHALF OF JOINT ENVIRONMENTAL ADVOCATES

July 28, 2026

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Dockets UE-260005 & UG-260006
Puget Sound Energy
2026 General Rate Case

WUTC STAFF DATA REQUEST NO. 147:
REQUESTED BY: Quinn A. Weber

CETA Compliance

Please refer to Jacobs, Exh. JJJ-1T at 15, Figure 1.

a. Please provide the exact percent of clean energy projected for each year after 2025.

b. Please confirm that "clean energy %" in Figure 1 refers to the total electricity from renewable resources and non-emitting electric generation as a percent of total retail load. In other words, please confirm that the projected percentages in Figure 1 represent electricity that would qualify as part of the 80% or "primary compliance" requirement under RCW 19.405.040(1)(a).

c. Please confirm that Figure 1 projects that PSE will not meet the greenhouse gas neutral standard under RCW 19.405.040(1) during the 2030-2033 compliance period absent the use of either: 1. the incremental cost alternative compliance pathway under RCW 19.405.060(3) or 2. the alternative compliance payment under RCW 19.405.090(2) and RCW 19.405.040(1)(b)(i).

d. Please confirm that for each year from 2030-2033, Figure 1 projects that PSE's clean energy % will not be above 70%.

e. Please confirm that figure 1's projections of the percent of clean energy in the years 2030-2033 is:

    1. PSE's best current forecast

    2. Based on an assumption that all of the clean energy resources and DER acquisitions included in PSE's MYRP proposal will be acquired and in service at their current estimated in service.

Response:

a. The projected total electricity from renewable resources and nonemitting electric generation as a percentage of total retail load for each year after 2025 from Figure 1 on page 15 of the Prefiled Direct Testimony of Joshua J. Jacobs, Exh. JJJ-1T, are as follows:

Year	Projected Total Electricity from Renewable Resources and Nonemitting Electric Generation as a Percentage of Total Retail Load
2026	57.5%
2027	52.9%
2028	58.6%
2029	62.5%
2030	65.8%
2031	66.8%
2032	65.8%
2033	61.5%

The projected decreases in total electricity from renewable resources and nonemitting electric generation as a percentage of total retail load in calendar years 2027 and 2032 primarily reflect the expiration of certain renewable resources that are assumed to roll off in those years. Please see Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 054 for additional detail regarding the projected decreases in total electricity from renewable resources and nonemitting electric generation as a percentage of total retail load from 2031 through 2033.

b. Confirmed. The "clean energy %" in Figure 1 on page 15 of the Prefiled Direct Testimony of Joshua J. Jacobs, Exh. JJJ-1T, refers to the total electricity from renewable resources and nonemitting electric generation as a percentage of total retail load.

c. Figure 1 on page 15 of the Prefiled Direct Testimony of Joshua J. Jacobs, Exh. JJJ-1T, projects that PSE's total electricity from renewable resources and nonemitting electric generation as a percentage of total retail load will not reach 80 percent in any year during the 2030–2033 compliance period based solely on the renewable resources and nonemitting electric generation currently in PSE's portfolio and the resource acquisitions included in this proceeding. Accordingly, PSE acknowledges that additional resources beyond those reflected in Figure 1

on page 15 of the Prefiled Direct Testimony of Joshua J. Jacobs, Exh. JJJ-1T, will be necessary for PSE to meet the primary compliance requirement under RCW 19.405.040(1)(a) during the 2030–2033 compliance period.

However, PSE does not currently assume reliance on the incremental cost alternative compliance pathway under RCW 19.405.060(3), or on making an alternative compliance payment under RCW 19.405.090(2) and RCW 19.405.040(1)(b)(i), for the 2030–2033 compliance period. PSE's compliance strategy prioritizes direct procurement of renewable resources and nonemitting electric generation, including long-term utility-scale resources and additional acquisitions anticipated through PSE's 2026 Voluntary Utility-Scale RFP process, as part of its primary compliance strategy under RCW 19.405.040(1)(a). *See* Prefiled Direct Testimony of Craig J. Pospisil, Exh. CJP-1HCT. In parallel, as described in the Prefiled Direct Testimony of Aaron A. August, Exh. AAA-1T, PSE is actively procuring and expanding distributed energy resources ("DERs") and demand-side programs, including community solar, distributed solar and storage, battery energy storage system investments, energy efficiency, and demand response program expansion, all of which contribute to meeting PSE's clean energy needs.

Figure 1 on page 15 of the Prefiled Direct Testimony of Joshua J. Jacobs, Exh. JJJ-1T, reflects PSE's best current forecast of the available renewable resources and nonemitting electric generation and their contributions to meeting forecasted load as of the filing date in this proceeding (February 27, 2026), based on the assumption that all renewable resources and nonemitting electric generation and DER acquisitions included in PSE's Multi-Year Rate Plan proposal are acquired and placed in service at their currently estimated in-service dates. PSE's projected remaining deficit to meet the 80 percent target in 2030 is 2,718 GWh, as set forth in Table 4 on page 16 of the Prefiled Direct Testimony of Josua J. Jacobs, Exh. JJJ-1T.

d. Confirmed. As shown in the table in the response to subpart a above, Figure 1 on page 15 of the Prefiled Direct Testimony of Joshua J. Jacobs, Exh. JJJ-1T, projects that PSE's total electricity from renewable resources and nonemitting electric generation as a percentage of total retail load will not exceed 70 percent in any year from 2030 through 2033. *See also* the response to subpart c above.

    1. Confirmed. PSE developed this forecast on the best and most current information available as of the filing date in this proceeding (February 27, 2026).

    2. Confirmed. *See* the response to subpart c above.