

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

In the Matter of  
  
PUGET SOUND ENERGY, INC.  
  
2021 Clean Energy Implementation Plan

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DOCKET NO. UE-210795

**NW ENERGY COALITION RESPONSE TO  
PSE PETITION FOR REVIEW OF AN  
INTERLOCUTORY ORDER**

Pursuant to WAC 480-07-810, the NW Energy Coalition (NVEC) submits this response to PSE’s petition for review of the presiding officer’s order (Order 10) denying PSE’s Motion for Consolidation. NVEC agrees that the UTC should review and reverse Order 10. This relief would prevent prejudice to NVEC and would save NVEC significant additional time and expense.

First, NVEC will suffer prejudice from delay in resolution of the Clean Energy Implementation Plan (CEIP) docket. In Order 10, the presiding officer suggested that consolidation would be inappropriate because the adjudication on PSE’s CEIP should extend at least several months into 2023. *See* Order 10, p.8 para 27 (“It is difficult to see how these complex, novel issues could be effectively adjudicated in the remaining months of the GRC’s statutory suspension period.”); Order 10, p.7 para 25 (“It would be enough, instead, for the parties to support a procedural schedule that allows for a decision on the CEIP in the months following the final order in the GRC.”). Such a timeline would represent a CEIP approval process that extends well over a year from the final CEIP, filed December 17, 2021, and likely closer to a year and a half since PSE filed its draft CEIP on October 15, 2021. It would also leave only two and a half years for implementation of PSE’s four-year action plan.

Such a lengthy timeline would prejudice NVEC. In the CEIP adjudication, NVEC intends to propose significant changes to some of the targets and specific actions included in

PSE's CEIP, including some of the distributed energy resources (DERs) designed to ensure an equitable distribution of benefits. Order 10 suggests that PSE should proceed with implementing the CEIP before the UTC approves it. *See* Order 10, p.7 para 24 ("The Commission may also consider that the Company is required to work towards CETA compliance even while awaiting Commission approval of interim targets in the CEIP."). If PSE does so, NWEC will have a diminished opportunity to influence the specific actions PSE takes under the CEIP, because PSE will already have taken some actions and spent significant time preparing for others. The purpose of allowing an adjudication of the CEIP is to provide parties with an opportunity to challenge its contents. That opportunity becomes less meaningful if the adjudication is resolved too late for the company to change course.

Alternatively, PSE suggests in its petition for review of Order 10 that it may delay or scale back its implementation of the CEIP until it receives approval from the UTC. This would also prejudice NWEC and its members by delaying the benefits of a rapid and equitable clean energy transition.

In short, delay in resolving the CEIP adjudication would prejudice NWEC, regardless of whether PSE moves forward with implementing its CEIP in the interim or not. Either scenario delays and decreases the opportunity for the UTC to direct PSE to take a different set of specific actions proposed by NWEC, instead of the specific actions currently included in the final CEIP.

Second, denying consolidation would impose unnecessary additional time and expense on NWEC. NWEC has retained expert witnesses to examine issues surrounding PSE's planned distributed energy resources and associated enablement actions. Overlapping issues surrounding these resources and actions arise in both the general rate case and the CEIP docket. *See, e.g.*, testimony of William T. Einstein regarding DER enablement costs (WTE-1CT). Keeping these

proceedings separate will result in two separate sets of expert testimony on these issues and duplicative discovery requests. This additional time and expense will make it more challenging for NWECC to participate fully in both dockets.

For the foregoing reasons, the Commission should accept administrative review of Order 10 and reverse it to grant PSE's Motion for Consolidation of its general rate case with its CEIP.

Dated this 2nd day of May, 2022.

Respectfully submitted,

/s/ Amanda Goodin

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