

March 29, 2024

UE-220066

***Filed Via Web Portal***

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

Received  
Records Management  
Mar 29, 2024

**Re: Compliance Filing  
Multi-Year Rate Plan Annual Report  
Dockets UE-220066, UG-220067, and UG-210918 (consolidated)**

Dear Executive Director Killip:

Puget Sound Energy (“PSE”) submits this Compliance Filing pursuant to paragraphs 53 and 60 of the Multiparty Settlement Agreement approved in consolidated Dockets UE-220066 and UG-220067 (“2022 GRC”) and paragraphs 237 and 243 of Final Order 24 in the 2022 GRC, attached please find PSE’s Multi-Year Rate Plan (“MYRP”) Annual Report (“2023 Annual Report”). This report includes:

1. A review of PSE’s actual 2023 investments made compared to what was used to set rates for the first year of the MYRP.
2. An update on PSE’s efforts related to the Inflation Reduction Act and the Infrastructure Investment and Jobs Act.
3. Reporting on the metrics identified in paragraph 60 of the Settlement Agreement as required by paragraph 93 in the Final Order.
4. An earnings sharing calculation pursuant to RCW 80.28.245.

**I. ATTACHMENT A METRICS**

Pursuant to Section N of the Settlement Agreement, Attachment A to the 2023 Annual Report provides for the 119 metrics (“Attachment A Metrics”) agreed upon by the Settling Parties. Similar to the 2022 Annual Report, the data needed to calculate certain of the metrics listed in Attachment A to this 2023 Annual Report rely on various internal and external sources that will not be available until the end of the second quarter. Therefore, PSE will provide the 2023 data for such metrics on August 31, 2024, the same day it plans to supplement its Table 4 Metrics with 2023 energy burden and affordability data, the filing plan for which was discussed in the cover letter to the Compliance Filing made on February 15, 2024 in these dockets.

In Final Order 08 in PSE's CEIP filing, the Commission directed PSE to modify its methodology for classifying vulnerable populations.<sup>1</sup> Accordingly, on November 2, 2023, PSE incorporated the revised definitions and geographies of vulnerable populations in its 2023 Biennial CEIP update, pursuant to the Commission's directives. However, in order to capture the equity efforts in flight during the revision period and to achieve alignment with the Biennial Conservation Plan calendar, PSE implemented the revised vulnerable population standards articulated in Final Order 08 beginning on January 1, 2024. Consequently, the Attachment A Metrics reporting for the 2023 period do not utilize the definitions and geographies of vulnerable populations articulated in Final Order 08 but rather are based on the definitions originally established in PSE's 2021 CEIP because the implementation and revision period took the remainder of the 2023 to complete.

## II. TARRIF FILINGS

Pursuant to the Commission's letter order approving PSE's 20243 Annual Report<sup>2</sup>, PSE will submit the tariff filings resulting from this 2023 Annual Report at the end of the review period rather than contemporaneously with this compliance filing as discussed in more detail in the Annual Report.

## III. CONCLUSION

PSE respectfully requests that the Commission approve PSE's compliance filing and make a determination that no refunds are required. If the Commission finds that no refunds are needed, PSE will make a tariff filing to reflect the transfer of the amounts that are no longer deemed subject to refund between Schedules 141R and 141N.

Please contact me at (425) 456-2105 should you have any questions.

Sincerely,

*/s/ Susan E. Free*

Susan E. Free  
Director of Revenue Requirements and  
Regulatory Compliance  
Puget Sound Energy  
PO Box 97034, BEL10W  
Bellevue, WA 98009-9734  
(425) 456-2105 / [susan.free@pse.com](mailto:susan.free@pse.com)

cc: Service List in Dockets UE-220066 and UG-220067

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<sup>1</sup> See *PSE Clean Energy Implementation Plan*, Final Order 08 at P 153, Conditions 9 and 10 (issued June 6, 2023), order conditionally approving PSE's Final CEIP.

<sup>2</sup> See *Re: UTC vs. PSE, Docket UE-220066 et al.*, Acknowledgement Letter (issued on Sept. 14, 2023).

Jeff Killip, Executive Director & Secretary

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Attachments:

Multi-Year Rate Plan Annual Report

Attachment A – Settlement Metrics Reporting

Attachment B – Portfolio Threshold Calculation and Detail of Actual Plant Closings vs.  
Forecasted Amounts Set in Rates

Attachment C – In-Service Dates for Specific Investment

Attachment D – Narrative Explanations for Significant Deviations between Actual and  
Forecasted Investments

Attachment E – Earnings Sharing Calculation