



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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July 15, 2024

RE: *In the Matter of Washington Utils. and Transp. Comm'n v. Puget Sound Energy, Final Order 24/10, Appendix A, Item 50,*
Dockets UE-220066, UG-220067, UG-210918 (consolidated)

TO ALL PARTIES:

On December 22, 2022, the Washington Utilities and Transportation Commission (Commission) entered Final Order 24/10 (Order 24/10) in Dockets UE-220066, UG-220067, and UG-210918 (consolidated) which, among other things, authorized and required Puget Sound Energy (PSE or Company) to conduct a pilot distributional equity analysis (DEA) on its 80 MW portfolio of distributed solar resources. The Company identified the resources in the 2021 Integrated Resource Plan (IRP) and the Clean Energy Implementation Plan (CEIP), as detailed in Appendix A, Item 50.¹

On March 22, 2024, PSE filed with the Commission a DEA pursuant to Appendix A, Item 50 of Order 24/10.

On July 10, 2024, Commission staff (Staff) filed a letter in this docket informing the Commission that it reviewed the Company's compliance filing and believes that it does not fully meet the requirements imposed by Order 24/10.² While acknowledging that PSE has taken substantial steps toward compliance, Staff notes that PSE remains in the early stages of DEA pilot implementation with no final results available at the time of filing, and that the Company did not apply the developed methodology across the proposed distributed solar portfolio as outlined in the company's 2021 CEIP.³ Instead, Staff claims that PSE narrowly

¹ Wash. Utils. & Transp. Comm'n v. Puget Sound Energy, Dockets UE-220066, UG-220067, & 210918, Order 24/10, 71, ¶ 232 (Dec. 22, 2022) (2022 PSE GRC Order) ("Within 15 months of the approval of this MYRP, PSE will file with the Commission a compliance item documenting the methods and results of the pilot distributional equity analysis.")

² 2022 PSE GRC Order at 71, ¶ 232.

³ *In re Puget Sound Energy's 2021 Clean Energy Implementation Plan*, Docket UE-210795, Final Clean Energy Implementation Plan at 77 (December 17, 2021) (2021 CEIP).

placed the focus on two solar projects. Staff contends that these projects represent 0.3% of the proposed new distributed solar capacity significantly limiting the value of the findings to address systemic inequities across PSE's service territory.

The Commission affirms Staff's position that PSE has made progress toward compliance regarding Appendix A, Item 50 of Order 24/10 but that the DEA filed by PSE on March 22, 2024, does not fully comply with Order 24/10.

JEFF KILLIP

Executive Director and Secretary