

Thanks for the opportunity to provide comments on the latest Puget Sound Energy (PSE) Clean Energy Implementation Plan (CEIP) meeting held on Sept 14. The inputs provided below are in response to the meeting materials (at https://irp.cdn-website.com/dc0dca78/files/uploaded/2021_SeptemberIRPMeetingMaterials_Updated091421.pdf) and discussion (at https://www.youtube.com/watch?v=amG_HeHUJ40) and the PSE CEIP requirements matrix located on the PSE website (at https://irp.cdn-website.com/dc0dca78/files/uploaded/UE-210571%20Order%2001%20CEIP%20Content_Final_web4.pdf).

First, it should be noted that these additional PSE CEIP meetings are facilitated by the schedule extension granted to PSE by the Utilities and Transportation Commission (UTC), which included docket UE-210571 Order 01 (at <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=32&year=2021&docketNumber=210571>) which included a provision to provide the PSE CEIP content for public review.

On Sept 20, PSE provided a progress update to the UTC (at <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=37&year=2021&docketNumber=210571>) in which PSE cites this Sept 14 PSE CEIP meeting and the CEIP requirements matrix as evidence of providing “the CEIP content required by WAC 480-100-640” to the PSE CEIP advisory groups.

This input cites multiple instances where PSE has failed to comply with UTC UE-210571 Order 01. **As a consequence, PSE has not made adequate provision of CEIP data available for public review to the PSE CEIP advisory groups.**

Energy efficiency target not provided

PSEs presentation material indicates the required energy efficiency target will not be available until the draft CEIP, currently scheduled on Oct 5. It would be helpful for public review to make this information available earlier than Oct 5..

Demand response (DR) target falls short of what is required

Thanks for providing a DR target of 23.8MW. However, WAC 480-100-660(3)(a)(ii) says “the utility must provide proposed program details, program budgets, measurement and verification protocols, target calculations, and forecasted distribution of energy and nonenergy costs and benefits for the utility's demand response target.”

When will PSE provide this information per the UTC order?

Renewable energy (RE) target falls short of what is required

Thanks for providing a RE target of 59% of retail sales. However, WAC 480-100-660(3)(a)(iii) says “the utility must ... provide details of renewable energy projects or programs, program budgets as applicable, and forecasted distribution of energy and nonenergy costs and benefits.”

When will PSE provide this information per the UTC order?

PSE CEIP specific actions fall short of what is required

The specific actions presented by PSE at the Sept 14 meeting do not reflect the level of detail required in WAC 480-100-660(5), which states:

“Each CEIP must present the specific actions in a tabular format that provides the following information for each specific action:

(a) The general location, if applicable, proposed timing, and estimated cost of each specific action or remaining resource need, including whether the resource will be located in highly impacted communities, will be governed by, serve, or otherwise benefit highly impacted communities or vulnerable populations in part or in whole;

(b) Metrics related to resource adequacy including contributions to capacity or energy needs; and

(c) Customer benefit indicator values, or a designation as nonapplicable, for every customer benefit indicator described in subsection (4)(c) of this section.”

In the context of CETA, a specific action is implementation of an energy generation or conservation program. The PSE presentation on Sept 14 identified generic steps, not specific actions. When will PSE provide this information per the UTC order?

Cost of compliance information falls short of what is required

WAC 480-100-640 requires utilities to provide a projected incremental cost per WAC 480-100-660(4).

WAC 480-100-660(4) says “The utility **must** file projected incremental cost estimates in **each** CEIP” (emphasis added). Neither the presentation on Sept 14 nor the information filed on the PSE CEIP website on Sept 18 contains an incremental cost estimate.

WAC 480-100-660(4) also says:

“The utility must ... provide the following information:

(a) Identification of all investments and expenses that the utility plans to make during the period in order to comply with the requirements of RCW [19.405.040](#) and [19.405.050](#);

(b) Demonstration that the investments and expenses identified in (a) of this subsection are directly attributable to actions necessary to comply with, or make progress towards, the requirements of RCW [19.405.040](#) and [19.405.050](#); and

(c) The expected cost of the utility's planned activities and the expected cost of the alternative lowest reasonable cost and reasonably available portfolio.”

None of this information was presented for public review on Sept 14 nor is it included in the materials PSE posted on their CEIP website on Sept 18. When will PSE provide this information per the UTC order?

Measures for delivery of clean energy benefits to vulnerable populations not developed

It is notable that PSE has identified attributes of vulnerable populations. It is concerning that PSE has not determined how to identify whether the clean energy benefits provided by their Clean Energy Transformation Act (CETA) transition is reaching these populations.

I appreciate the challenges demanded by CETA and commend PSE for pursuing a solution. However, it would be inappropriate to suggest that PSE has fulfilled their obligation to report on this portion of the CEIP requirements.

In addition to these concerns, there are two additional items to raise to your attention regarding the Sept 14 PSE CEIP meeting.

2026 peaker plant “not part of this CEIP”

PSE has made this point multiple times. It is certainly appropriate to exclude any and all resources that do not support achieving CETA objectives from the PSE CEIP cost of compliance analysis.

However, confusion arises when PSE cites dispatch expectations of a peaker plant, which the 2021 PSE IRP claims is needed to meet resource adequacy requirements, to support their fuel switching strategy to either biofuel or hydrogen (of which the partnership with Mitsubishi* is intended to enable) to achieve 100% clean electricity by 2045. Would PSE post the answers to these related questions on their website:

- Is the proposed 2026 peaker plant part of the resources that PSE will switch to biofuel or hydrogen to achieve CETA 100% clean electricity requirements by 2045?
- What analysis does PSE have on the market availability and price of hydrogen to fuel a 100% clean peaker plant?
- Where will PSE source the hydrogen to fuel a 100% clean peaker plant?
- Given the CETA 100% clean electricity timeline, what is the expected operational duration of the proposed 2026 peaker plant if it will not be converted to non-emitting fuel, and how does that compare to the nominal lifecycle of a peaker plant?

Resource question

As a follow-up to a question raised at the July 29 meeting, would PSE post the answer to this question on their website:

How many combined MWh from peaker and CCCT plants do you expect to dispatch in calendar year 2044?

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* PSE, Mitsubishi and the Vashon Climate Action Group are all supporting members of the Renewable Hydrogen Alliance