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**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PUGET SOUND ENERGY,

Petitioner.

Docket UE- _____

Motion of Puget Sound Energy
for Exemption of General Order 601
in Dockets UE-191023 and
UE-190698

I. INTRODUCTION

1. In accordance with Washington Administrative Code (WAC) 480-100-008, 480-07-110, 480-07-375, and 480-07-870, Puget Sound Energy (“PSE”) moves the Washington Utilities and Transportation Commission (the “Commission”) to issue an order amending General Order 601 in Dockets UE-191023 and UE-190698 (consolidated), which indicates that PSE should file a draft of its Clean Energy Implementation Plan (the “Draft CEIP”) by August 15, 2021, and instead require PSE to file its Draft CEIP by October 15, 2021. Granting PSE’s request is in the public interest because an extension is necessary and appropriate to allow additional time for the new Equity Advisory Group to provide input on the Draft CEIP. An extension may also have the additional benefit of

1 allowing PSE time to incorporate some new and/or updated information into the Draft
2 CEIP.

3 2. PSE is an electric company and public service company within the meaning
4 of RCW 80.04.010 and is subject to the Commission’s jurisdiction over PSE’s prices and
5 terms of electric service to PSE’s retail customers in Washington. PSE provides electric
6 service to over 1 million retail customers in western Washington.

7 3. PSE’s name and address are as follows:

8 Puget Sound Energy
9 355 110th Ave NE
10 Bellevue, Washington 98004
11 Attn: Kara Durbin
12 Manager, Regulatory Policy
13 Email: kara.durbin@pse.com

14 **II. PSE’s EXEMPTION REQUEST**

15 4. RCW 19.405.060(1)(a) provides, in pertinent part, as follows:

16 *By January 1, 2022, and every four years thereafter, each investor-*
17 *owned utility must develop and submit to the commission:*

18 (i) A four-year clean energy implementation plan ...¹

19 Further, RCW 19.405.060(c) provides that “[t]he Commission, after hearing, must by order
20 approve, reject, or approve with conditions an investor-owned utility’s clean energy
21 implementation plan and interim targets.”

¹ RCW 19.405.060(1)(a) (emphasis added).

1 5. In General Order 601, the Commission adopted new rules and revised
2 existing rules to implement the Clean Energy Transformation Act. As part of General
3 Order 601, the Commission found

4 ... that it is appropriate to request that utilities file a draft to their
5 first CEIP. Availability of a draft of a utility’s initial CEIP will allow
6 the utility, Staff, and stakeholders to work through issues and
7 concerns in a semi-formal process that provides transparency and
8 record building with maximum flexibility. Utilities, therefore,
9 should file a draft initial CEIP with the Commission by August 15,
10 2021, which will be the initial filing in each utility’s docket.²

11 6. PSE respectfully requests that the Commission amend General Order 601
12 as it relates to PSE and allow PSE to file its Draft CEIP by October 15, 2021. An extension
13 is necessary and appropriate to allow additional time for the new Equity Advisory Group,
14 as well as other advisory groups, to provide input on the Draft CEIP. This extension may
15 also permit PSE to incorporate some updated information into the Draft CEIP. The reasons
16 for this request are explained in further detail in PSE’s Petition for Exemption of
17 WAC 480-100-640(1) (“Petition”), which PSE is filing concurrently with this Motion on
18 July 21, 2021.

19 7. At the time the Commission issued General Order 601, and for many
20 months afterwards, PSE believed it would meet the Commission’s requested draft filing
21 date for the Draft CEIP of August 15, 2021. As explained further in PSE’s Petition,
22 however, PSE is seeking an extension to allow the newly formed Equity Advisory Group
23 more time to (i) consider information and provide meaningful input into key CEIP topics
24 and (ii) explore options for expanded community engagement, including identifying all

² *In the Matter of Adopting Rules Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act*, General Order 601 at ¶ 25, Dockets UE-191023 & UE-190698 (cons.) (Dec. 28, 2020).

1 channels to engage frontline communities of low-income people and Black, Indigenous,
2 and People of Color. PSE values this feedback from members of the Equity Advisory
3 Group and seeks to accommodate the request for additional time necessary to address these,
4 and perhaps other, issues. It is PSE's understanding that certain members of the Energy
5 Advisory Group, or the organizations whom such members represent, may provide letters
6 to PSE or file letters with the Commission in support of the request for an extension.

7 8. Granting PSE an additional two and a half months to file its Draft CEIP will
8 allow more time for the Equity Advisory Group to deliberate and formulate informed
9 thoughts and recommendations prior to PSE filing its draft. It would also allow PSE
10 additional time to consult with its other advisory groups, such as the Conservation
11 Resource Advisory Group, Low Income Advisory Committee, and the Integrated Resource
12 Plan Public Participation group.

13 9. Based on the foregoing, PSE respectfully requests that the Commission
14 amend General Order 601, which requires PSE to file its Draft CEIP by August 15, 2021,
15 and instead allow PSE to file its Draft CEIP by October 15, 2021. As part of the Draft CEIP
16 filing, PSE anticipates it would also include an updated public participation plan. Granting
17 PSE's request is in the public interest because the extension would allow the Equity
18 Advisory Group more time to inform the development of the Draft CEIP. The extension
19 may also allow PSE to incorporate some updated information into the Draft CEIP that will
20 improve the final CEIP. PSE does not anticipate that an order of the Commission granting
21 this request would necessarily affect the implementation of the CEIP.

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DATED: this 21st day of July, 2021.

Respectfully submitted,

/s/ Jason Kuzma
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