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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

From: kevinjonvash@gmail.com <kevinjonvash@gmail.com>
Sent: Monday, September 27, 2021 11:00 PM
To: deborah.reynolds@utc.wa.gov; 'Frankiewich, Kyle (UTC)' <kyle.frankiewich@utc.wa.gov>
Cc: sally.brown@utc.wa.gov
Subject: UE-210571 Order 01 compliance question

Hello Deborah and Kyle,

Please see the attached response to Puget Sound Energy (PSE) regarding their September 14, 2021 Clean Energy Implementation Plan (CEIP) public participation meeting.

We were disappointed to not see the required CEIP components presented at the public meeting. In our assessment, PSE has failed to fully comply with Order 01, which states at paragraph 19 (emphasis added):

*As the Joint Commenters observe, allowing PSE additional time to prepare its CEIP will afford the Company the opportunity to gather critical feedback from stakeholders, particularly its EAG. We share Staff's and other stakeholders' concerns that the Petition and Motion do not contain details regarding which tasks PSE intends to pursue during the extension period. To address these concerns, we adopt five of the conditions the Joint Commenters propose and acknowledge PSE's commitment to file an update to its CEIP Public Participation Plan by September 1, 2021. **Specifically, we require PSE to provide the following information to each of its advisory groups with 30 days of the effective date of this Order:***

1. **The CEIP content required by WAC 480-100-640.**
2. **An updated forecast of PSE's ability to comply with CETA within the cost of compliance limits in WAC 480-100-660, and description of any changes from its 2021 IRP.**
3. *Any proposed updates to targets and actions generated from the RFP process.*
4. *Any proposed updates to targets and actions generated from the CEIP process to date, including the results of applying Customer Benefit Indicators (CBIs) to all proposed actions and resources.*
5. *Share between all advisory groups answers to questions posed to advisory group members regarding the prioritization of CBIs, as well as the results from both the customer survey and the business customer*

The table which PSE posted to their website (at https://irp.cdn-website.com/dc0dca78/files/uploaded/UE-210571%20Order%2001%20CEIP%20Content_Final_web4.pdf) and submitted to the docket by PSE on September 17th, does not meet the requirements of Order 01 as explained in the enclosure. As an unfortunate consequence, public review of much of the PSE CEIP content mandated by WAC 480-100-640 will be delayed until the draft CEIP is filed on October 15th, almost a month following the deadline established in the order.

Is it possible that some relief was granted to PSE regarding Order 01? There is no evidence of that in the UE-210571 docket. It would be helpful to know if such relief was granted.

We request that you clarify what actions the UTC is planning in response to PSEs non-compliance with the Commission's order.

We also request that these comments be included in UE-210571 as part of the public record. Could you confirm that this will be done?

Thanks in advance for your reply to these questions,

Kevin Jones, Vashon Climate Action Group

David Perk

Elyette Weinstein

Anne Newcomb

Court Olson, Shift Zero member and People for Climate Action President

Don Marsh, Lead, Washington Clean Energy Coalition

Virginia Lohr, Vashon Climate Action Group

Rob Briggs, Vashon Climate Action Group

Kate Maracas, Western Grid Group

Michael Laurie, Sustainability consultant, Watershed LLC

Steve Erickson, Whidbey Environmental Action Network

Jon Mathison, P.E., IEEE Senior Member, Power Energy Society

Bill Westre, Union of Concerned Scientists