



Feb. 1, 2024

Kathy Hunter, Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Docket UE-231031 Puget Sound Energy's Electric Tariff Revision

The Washington State Solar Energy Industries Association (WASEIA) would like to express its full support of Puget Sound Energy's revised tariff filing of January 18, 2024. As noted by PSE in the filing, the proposed extension of Schedule 150 is a temporary measure designed to maintain the current regulatory status until a comprehensive Value of Solar study (VOS) can be conducted. The proposed study would serve as a guide for future work to determine a successor tariff that is fair and equitable.

To support this request, WASEIA would like to highlight that RCW 80.60 establishes a *minimum* net metering requirement of "four percent of the utility's highest demand in 1996." This requirement should in no way be misconstrued as a limit, as there are several utilities that have exceeded the 4% threshold¹. PSE is not required to end this tariff at any point, and the Commission is also not obligated to discontinue net metering at this threshold for any of the utilities it oversees.

WASEIA has been collaborating closely with PSE and other stakeholders for an extended period in securing the necessary funding for a VOS during the 2024 legislative session. It is critical that the existing framework for net-metered solar remains unchanged statewide until the completion of the study by the Washington State Academy of Sciences. This study will include stakeholders, experts, voices of environmental justice organizations, and important metrics that were left out of the utility-funded E3 study^{2 3 4}. It is crucial that a comprehensive, broad-based analysis be used to guide the adoption of a successor rate to net metering.

¹ [WSU Net Metering](#)

² [Comments on Washington Utilities NEM Evaluation-Draft Results](#), M. Cubed, Dec. 1, 2023

³ [Comments of Behalf of NWECA and Spark Northwest on the E3 NEM evaluation preliminary results](#)

⁴ [Comments on Behalf of Sunergy Systems, McKinstry, Western Solar and WASEIA on E3 NEM evaluation preliminary results](#)



PSE has also noted that potential solar customers are uncertain about whether or not PSE will discontinue net metering for new customers. Approval from the Commission for this filing would immediately alleviate any confusion and provide the transparency and assurance that prospective solar adopters need to make well-informed decisions about their solar investments over the next two years.

Based on all the information available regarding this docket at the time of this writing, as well as WASEIA's experience collaborating with PSE's team in pursuing a VOS study, it is evident that PSE is committed to responsibly collecting input from its technical advisory groups, and any other interested stakeholders, and making certain these groups participate in the aforementioned VOS study. In this position, PSE possesses the capability to provide critical input to the Academy, ensuring that any concerns about equity and cost are appropriately addressed in the analysis. Once this step is completed, they can then move forward with implementing a revised tariff for net metering, taking into account the impartial and extensive data provided by the study.

Please approve PSE's temporary filing regarding Net Metering Schedule 150.

Regards,

Bill Will

Senior Policy Advisor

bill@waseia.org

Washington Solar Energy Industries Association