

Jan. 6, 2022

UE-210878

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission

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UTIL. AND TRANSP.
COMMISSION

RE: Comments from Washington Solar Energy Industries Association, Docket UE 210878
2022 Draft Distributed Energy Resources Request for Proposals (PSE)

Dear Ms. Maxwell:

WASEIA appreciates the opportunity to comment on Puget Sound Energy's Draft
Distributed Energy Resources Request for Proposals. Here our are brief comments:

From Table 2, Page 4:

For the 2022-2025 time period, PSE projects solar (80mW) and battery (25mW) deployments
that are extremely modest and likely far too conservative.

Deployment of distributed renewables and demand response is cumulative. Their benefits begin when they are
added to the grid and continue through their service lifetime, which is well after full CETA compliance is realized.
DERs added in the early stages of CETA compliance ease the burden of ramping up deployments later on in
addition to providing benefits (clean electricity, grid resilience and others) immediately. The solar and storage
industry in Washington could easily support more robust deployment.

From Table 3, Page 5

2021 CEIP Preferred Portfolio (Table 3) is almost exclusively PSE owned or leased installations. Partnerships with
third parties would help PSE leverage industry expertise and create and sustain local jobs.

From Section 3. Category B: Vendor Service Components, starting on Page 27

These requirements are detailed, exhaustive, and ultimately onerous. They may be overly complex to the point
they produce administrative overhead that would preclude submission of a cost effective bid, particularly for
smaller companies with limited administrative resources.

Thank you.

Sincerely,

Bill Will
Washington Solar Energy Industries Association