ATTACHMENT A:
PLANNING TRANSITION WORK PLAN

June 5, 2024

Contents

1. Introduction

1.1. About PSE

Puget Sound Energy (PSE) is Washington State's largest and oldest utility, serving 1.5 million customers in ten counties over 6,000 square miles. PSE was an early leader in clean energy—from establishing one of the largest energy efficiency programs in the nation to building its first wind facility, Hopkins Ridge in 2005. PSE's commitment to clean energy and reducing greenhouse gas emissions has strengthened in recent years, as evidenced by support of the passage of the Clean Energy Transformation Act (CETA), the Climate Commitment Act (CCA), and most recently, the Washington Decarbonization Act for Large Combination Utilities (Large Combination Utilities Decarbonization Act).

In 2021, PSE developed and filed its first Clean Energy Implementation Plan (2021 CEIP) under CETA. The 2021 CEIP described PSE's initial plans to implement CETA for the first compliance period (2022–2025). It charted new directions in electricity supply and included new and diverse voices in planning as it aimed to find affordable, clean energy solutions that benefit all customers, while reducing burdens on highly impacted communities and vulnerable populations. The Washington Utilities and Transportation Commission (Commission) approved the 2021 CEIP with conditions in Order 08 in Docket UE-210795 on June 6, 2023. In 2023, PSE filed the 2023 Biennial CEIP Update (Biennial CEIP Update) to the 2021 CEIP to update goals and targets, address conditions in Commission Order 08, and report progress on specific actions, equity, and public engagement. The Commission approved the Biennial CEIP Update with conditions in Order 12 in Docket UE-210795 on March 25, 2024.

1.2. About the Washington Decarbonization Act for Large Combination Utilities

PSE was previously required to file a multitude of different plans for the gas and electric businesses on different timelines with the Commission. These plans are often duplicative and time consuming for the Company, the Commission, and interested parties, and as the Legislature found in the Large Combination Utilities Decarbonization Act, these planning processes "might not yield optimal results for timely and cost-effective decarbonization."[1] As a result, the Legislature passed the Large Combination Utilities Decarbonization Act in March 2024. This new law enables PSE, under the supervision of the Commission, to more thoughtfully plan for electric and natural gas customer choices consistent with our state's aggressive climate goals. The Large Combination Utilities Decarbonization Act – which only applies to PSE – envisions the creation of an integrated system planning process that aligns

[1] *See* Large Combination Utilities Decarbonization Act, Engrossed Substitute House Bill 1589 of 2024, Sec. 3(1).

planning for the Company, customers, and interested parties and maintains important standards and legal requirements.

The Commission will conduct a rulemaking proceeding to consider and adopt new rules that will facilitate PSE's filing of a first integrated system plan in 2027. In the interim, the Legislature empowered the Commission to extend certain deadlines and requirements associated with legacy planning processes to enable the transition to the integrated planning framework.[2] To support this transition, PSE must publish, and the Commission must find, that this Planning Transition Work Plan demonstrates PSE's "reasonable progress" towards achieving CETA's requirements.[3]

1.3. About this Planning Transition Work Plan

This Planning Transition Work Plan (Work Plan) highlights PSE's "reasonable progress" implementing CETA, consistent with section 3(3) of the Large Combination Utilities Decarbonization Act. PSE is publishing this Work Plan to bridge the gap between the legacy planning framework of the past and 2027, when PSE will file the first integrated system plan under the new law. In this Work Plan, PSE highlights progress, achievements, and anticipated next steps for implementing CETA clean energy targets and ensuring all customers benefit from the clean energy transition.

This Work Plan is yet another milestone in a clean energy journey that will span almost a quarter century. There is much work still ahead; PSE must continue to acquire new customer-scale and commercial-scale resources and partner and collaborate with customers and interested parties, including those in named communities and deepest need.[4] Alongside this important work, PSE needs to maintain and provide affordable, safe, and reliable service now and in the years to come while preparing for the new planning framework envisioned in the Large Combination Utilities Decarbonization Act.

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[2] *See id.*, Sec. 3(3) ("Upon request by a large combination utility, the commission may issue an order extending the filing and reporting requirements of a large combination utility under RCW 19.405.060 and 19.280.030, and requiring the large combination utility to file an integrated system plan pursuant to subsection (4) of this section if the commission finds that the large combination utility has made public a work plan that demonstrates reasonable progress toward meeting the standards under RCW 19.405.040(1) and 19.405.050(1) and achieving equity goals. The commission's approval of an extension of filing and reporting requirements does not relieve the large combination utility from the obligation to demonstrate progress towards meeting the standards under RCW 19.405.040(1) and 19.405.050(1) and the interim targets approved in its most recent clean energy implementation plan. Commission approval of an extension under this section fulfills the large combination utilities statutory filing deadlines under RCW 19.405.060(1).").

[3] *Id.*

[4] *See* sections 4 and 5 of this Work Plan below.

In addition to highlighting progress thus far, this Work Plan considers policies, costs, changing economic conditions, and the existing energy system to meet the needs of customers at the lowest reasonable cost in 2026 and 2027. The Work Plan includes interim and specific targets for 2026 and 2027, as outlined below in Table 1. The discussion that follows describes how PSE's planned actions in 2026 and 2027 support achievement of these targets and continue progress towards achieving long-term CETA requirements.

Table 1: Interim and Specific Targets in 2026 and 2027

Description	2026	2027
Interim Target	63%	63%
Renewable Energy	62.5%	62.5%
Demand Response*	149 MW	164 MW
Distributed Energy Resources (DER) – Solar*	110 MW	140 MW
DER – Storage*	50 MW	75 MW
Energy Efficiency	Will be determined in 2026-2027 Biennial Conservation Plan	

* Work Plan goals for Demand Response, DER Solar, and DER Storage reflect cumulative amounts relative to the 2021 CEIP specific targets.

2. Meeting Obligations to Provide Clean and Reliable Energy

Over the last couple of years, PSE made reasonable progress towards achieving CETA's transformational obligations that all retail electric load be greenhouse gas neutral by 2030, and that by January 1, 2045, all retail electric load be supplied by clean energy, defined as either renewable or nonemitting electric generation resources.[5] As noted in the Biennial CEIP Update, in the 2022-2025 compliance period, PSE expects to deliver significantly more megawatt-hours (MWh) of clean energy to electric customers than projected in the 2021 CEIP.[6] Electric loads have grown considerably since the 2021 CEIP was filed, and thus with a percentage of retail load target, PSE is delivering significantly more clean MWh in 2025 to achieve its percentage targets than originally anticipated in 2021. Since the 2021 CEIP, PSE has procured or signed long- and short-term deals totaling nearly 5 million MWh per year and is seeking to procure an additional 5 million more MWh in executing deals this year.

Through implementation of the actions in this Work Plan, PSE will build upon initial actions to transform its energy supply portfolio by acquiring additional clean energy – *and capacity* – resources to meet resource needs in an evolving and dynamic energy landscape. As discussed

[5] *See* RCW 19.405.020(36) (defining "retail electric load"); RCW 19.405.040(1); RCW 19.405.02(34) (defining "renewable resource"); RCW 19.405.020(28) (defining "nonemitting electric generation"); and RCW 19.405.050(1).

[6] Biennial CEIP Update, Executive Summary at 1.3.

further below, several factors may make it challenging for PSE to acquire sufficient electricity from clean energy resources to meet its 2025 interim target of 63 percent, established in the 2021 CEIP and affirmed by the Commission in approval of the 2023 Biennial CEIP Update. Over the next couple of years, PSE will prioritize long-term acquisitions that add additional clean energy resources to the region, as compared to short-term purchases that do not provide new clean energy resources and are offered at a higher cost than other available short-term energy resources.

2.1. Annual Interim Targets for 2026 and 2027

In the 2021 CEIP, PSE proposed interim targets for the 2022-2025 compliance period as a measure of progress towards CETA compliance in 2030 and beyond. The interim targets approved in the 2021 CEIP were: 43 percent in 2022, 53 percent in 2023, 59 percent in 2024, and 63 percent in 2025. Based on recent information, persisting trends in retail electric load growth, and changes in the availability of clean energy resources, this Work Plan proposes interim targets for calendar years 2026 and 2027 of 63 percent in each year. By maintaining that percentage over the next two years, PSE acknowledges it will need to make more significant progress in the remaining years prior to 2030 to achieve carbon neutrality pursuant to RCW 19.405.040 and remains committed to doing so. The targets for 2026 and 2027 are set forth in Table 3 below.

In the Biennial CEIP Update, PSE proposed to reduce the interim target for 2025 from 63 percent to 60 percent, primarily because of a significant increase in retail electric load – of approximately 7 percent – between the publication of the 2021 CEIP and the Biennial CEIP Update. As discussed in the Biennial CEIP Update, this increase in load requires significantly more clean energy generation resources than originally projected to achieve the interim target for 2025 of 63 percent.[7]

Other factors also contributed to PSE's proposal to adjust the 2025 target. For example, many clean energy resources under development in the region have delayed commercial operating dates for a variety of reasons outside of the control of PSE, such as delays related to interconnection and transmission issues, particularly with Bonneville Power Administration (BPA), and supply chain constraints for key components such as high voltage circuit breakers. PSE has faced these challenges in its All-Source RFP process, in which many renewable development projects have delayed their commercial operation date, often beyond 2027. Moreover, the regional demand for electricity from existing clean energy resources has increased faster than supply, tightening the market for these resources and driving up prices.

[7] *See* Biennial CEIP Update, Executive Summary at Sec. 2.

Although these changed circumstances present challenges, PSE continues to work diligently to acquire more electricity from clean energy resources.[8]

In its order approving the Biennial CEIP Update with conditions, the Commission acknowledged these changing conditions, but directed PSE to maintain the interim targets as approved in the 2021 CEIP (i.e., 63 percent for 2025). In doing so, however, the Commission also recognized that purchasing unreasonably costly energy should be considered when reviewing the Company's compliance with the interim targets at the end of the compliance period.[9] The interim targets proposed in this Work Plan – i.e., 63 percent for 2026 and 2027 – reflect PSE's consideration of Commission guidance from Order 12 in light of the persistent challenges described above. As set forth in Table 3 below, a 63 percent target for 2026 and 2027 represents a growing amount of clean energy needed in each year. PSE considered proposing lower annual interim targets in 2026 and 2027, given the significant cost of short-term market purchases of clean resources. However, given the Commission's reluctance to lower PSE's 2025 interim target from 63 percent to 60 percent, PSE chose to propose the targets contained in this Work Plan along with a plan for how to operationalize the Commission's direction regarding unreasonably costly energy from Order 12 that includes a not-to-exceed cost to purchase this short-term clean energy and a deadline for pursuing these resources to provide certainty and transparency to customers and the Commission.

PSE owned and contracted resources are not sufficient to reach 63 percent and new long-term resources are not available to add to PSE's portfolio until beyond 2027. Consequently, to achieve these targets in 2026 and 2027, with projected load growth and other challenges enumerated herein, PSE must act aggressively to acquire a significant amount of existing clean energy for CETA purposes on a short-term basis in the wholesale markets. Based on current estimates,[10] achieving 63 percent interim targets in 2026 and 2027 assumes that a large amount of short-term clean energy can be purchased from the market in those years. Table 2 below illustrates an approximate additional cost necessary to procure CETA eligible energy in the market to fill the gap in order to achieve a 63 percent interim target in 2026 and 2027 as expected under current forecasts assuming normal hydro conditions, although there is risk that this much clean energy may not be available in the region for PSE to purchase, even at a higher

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[8] Many resources under active consideration by PSE have identified in service dates outside the 2022-2025 compliance period. PSE issued an all-source RFP in 2021 to procure resources to meet its CETA clean energy needs as those needs increase incrementally to meet the 2030 targets and beyond. In that RFP, PSE asked for resources that could be online by 2026. Throughout execution of the 2021 RFP, however, many new renewable development projects have delayed commercial operation dates to late 2027 and beyond.

[9] *See* Order 12 at ¶ 28 ("If PSE would need to purchase unreasonably costly energy to meet the 2025 Interim Targets, the Commission will consider this in determining whether the Company has complied with the Interim Targets for the first compliance period.").

[10] In estimating the energy needed, PSE used a power cost forecasting methodology assuming normal hydro conditions. Additional energy above what is estimated here may be needed to meet these targets depending on actual conditions.

cost. The cost represented in Table 2 is only the estimated premium incremental cost associated with purchasing the CETA eligible energy as compared to what unspecified source energy would cost.

Using the Commission's guidance to not pursue interim targets at unreasonable cost, PSE will pursue short-term purchases in an effort to achieve 63 percent interim targets in 2026 and 2027 at a cost that does not exceed the estimated premium incremental cost presented in Table 2. These efforts will be executed by October of the preceding year, so that the incremental clean energy costs can be included in PSE's requested annual power cost update for each year and to provide transparency regarding the costs of these short-term purchases to the Commission and interested parties.

Table 2: Estimated premium costs for clean energy

Description	2026	2027
Approximate incremental CETA premium	$100 million	$140 million

Clean energy capacity resources are not available in abundance in the region, so the costs of acquiring it are substantial in the short-term markets. These short-term acquisitions, which are generally for existing renewable resources, are not a sufficient strategy for meeting PSE's longer-term CETA goals because they do not provide any additional clean energy on an on-going basis to PSE or to the region, particularly to meet CETA requirements in 2030 and beyond.

PSE carefully considered the concept of "reasonable progress" in light of these challenges and uncertainties, and the importance of balancing customer affordability with making progress towards CETA's interim – as opposed to the long-term targets required by law – clean energy objectives. PSE must weigh the benefit of short-term expenditures that do not represent long-term investments toward 2030 CETA objectives with the impact on customer affordability in the short-term. Acquiring new, long-term resources to meet CETA targets in 2030 and beyond will also add to customer costs. Therefore, pursuing a large amount of short-term market transactions for clean energy resources solely to meet annual interim targets in the near term, at a high premium, does not seem consistent with the spirit and intent of CETA, which seeks to transform the energy supply in the state in a way that "does not impair the reliability of the electricity system or impose unreasonable costs on utility customers."[11] These considerations lead to PSE's conclusion that its annual interim targets of 63 percent for 2026 and 2027 at an incremental cost not to exceed the values in Table 2 for each year, represent "reasonable progress."

Table 3: Interim Targets in 2026 and 2027

Description	2026	2027
Interim Target	63%	63%

[11] *See* RCW 19.405.010(1)-(2).

Total estimated CETA eligible energy needed	12.9 million MWh	13 million MWh

2.2. Capacity Need in 2026 and 2027

Reliably meeting customers' needs is the cornerstone of PSE's energy supply portfolio. To date, PSE has been able to meet CETA targets mostly by adding clean energy (MWh) during the timeframes it is readily available, while PSE continues to rely on fossil fuel resources for capacity needs during peak times and when renewable generation is low. In meeting CETA targets going forward a growing component of the costs of compliance will be tied to not only the costs of the clean, CETA-eligible energy (MWh), but also addressing capacity needs (MW) with increasing percentages of clean resources. Electric resources, particularly variable resources such as solar and wind, rarely perform at nameplate capacity during peak need. Therefore, ensuring resource adequacy relies on evaluating a resource's peak capacity contribution, which is the nameplate capacity combined with the Effective Load Carrying Capability. After adjusting for the peak capacity contribution of each resource, PSE's 2023 Electric Progress Report identified that PSE needs more resources to meet the peak need than the nameplate capacity suggests. For example, a 24 MW peak capacity contribution from solar resources requires over 1100 MW of installed nameplate capacity. After adjusting for peak capacity contribution, over 6,700 MW of new resources installed nameplate capacity adjusts to over 3,000 MW summer peak capacity, and over 2,700 MW winter peak capacity, as detailed further in the Electric Progress Report.[12]

The 2023 Electric Progress Report identified a significant capacity shortfall that is growing by winter of 2026. This need is summarized below in Table 4 for 2026, 2027, and 2030. To ensure that the energy from resources acquired to meet this need can be delivered to customers, PSE is working to optimize its use of its existing regional transmission portfolio to meet the growing need for renewable resources in the near term. However, the Pacific Northwest transmission system may need significant expansion, optimization, and possible upgrades in the long term to keep pace. Additional discussion of this topic and PSE's planned work during 2026 and 2027 is set forth in section 6.2 below.

Table 4: Capacity Needs in 2026, 2027, and 2030 from 2023 Electric Progress Report

Description	2026	2027	2030[13]
Winter peak MW deficit	1,467 MW	2,012 MW	2,744 MW
Summer peak MW deficit	1,542 MW	2,088 MW	2,895 MW

[12] *See* 2023 Electric Progress Report at p. 3.15, Figure 3.9.

[13] Additional discussion of PSE's planned resource acquisition activities is provided in Section 6.1 below.

3. Refining Specific Targets for Customer Programs

In the 2021 CEIP, PSE identified specific targets for renewable energy, demand response, DER solar, DER storage, and energy efficiency — all of which provide customers the ability to participate in the clean energy journey. Subsequently, PSE updated certain specific targets in the Biennial CEIP Update. In this Work Plan, PSE proposes additional updates to the specific targets for renewable energy, demand response, and DER solar and storage for 2026 and 2027. These specific targets represent PSE's continued progress towards achieving CETA's 2030 and 2045 requirements, while ensuring an equitable clean energy transition. PSE proposes to continue its current Biennial Conservation Plan process for purposes of energy efficiency; targets for 2026 and 2027 will be provided in the Biennial Conservation Plan that will be filed in 2025.

3.1. Renewable Energy

As set forth below in Table 5, PSE proposes renewable energy specific targets of 62.5 percent for both 2026 and 2027. Of note, PSE calculated these specific targets in alignment with Condition 3 from the Commission's Order 12 on the Biennial CEIP Update.[14] Consistent with this condition, these percentages are expressed as the renewable energy portion of clean energy (i.e., omitting the nonemitting portion, which was 0.4% in 2022); they also reflect *cumulative* renewable energy, not incremental, in each year.

Table 5: Renewable Energy Specific Targets for 2026 and 2027

Description	2026	2027
Renewable Energy	62.5%	62.5%

3.2. Demand Response

Demand response is a measure for reducing energy load in response to supply constraints, generally during periods of peak demand. Demand response provides an opportunity for consumers to play a significant role in the operation of the energy grid by reducing or shifting their energy usage during peak periods in response to time-based rates or other forms of financial incentives. By shifting load away from the grid-constrained peak usage period, demand response helps manage and maintain system reliability.

[14] *See* Order 12, Condition 3 ("Renewable Energy Specific Target: PSE will work with Staff to ensure that its expression of the Renewable Energy Specific Target in future CEIP filings aligns with the intent of Condition 5 for Order 08. This target should be cumulative (not incremental) and should reflect renewable energy (not all clean energy).").

In the 2021 CEIP, PSE committed to an overall 23.7 MW target for its demand response programs. After completing an RFP in 2022, PSE adjusted the target to 86 MW to reflect all cost-effective resources in compliance with Condition 4 in the Commission's order approving the 2021 CEIP. During a short time, PSE scaled up its demand response portfolio to achieve impressive milestones in the inaugural 2023-2024 season. Seven demand response events were called across the first winter season and 32 MW of curtailment was achieved.[15]

For purposes of this Work Plan, PSE plans to continue expanding its demand response portfolio past the CEIP target of 86 MW to achieve 164 MW by 2027, as set forth below in Table 6. PSE's focus for developing these additional demand response capabilities will be launching and expanding programs available to residential, commercial, and industrial customers as it continues to bring additional distributed energy resources into PSE's Virtual Power Plant.[16] In advance of the 2024 summer season, PSE is focused on increasing enrollment for existing programs, including electric vehicle (EV/EVSE) programs in demand response events, and launching new programs for water heaters, residential batteries, and smart thermostats for small/medium businesses. To achieve the targets in 2026 and 2027, PSE may need to seek out additional demand response programs beyond what is contracted currently with three vendors (Uplight (formerly AutoGrid), Opower, and Enel).[17]

Table 6: Demand Response Specific Targets in 2026 and 2027 (cumulative)

Description	2026	2027
Demand Response	149 MW	164 MW

3.3. Distributed Energy Resources: Solar and Storage

PSE is committed to delivering DER solar and storage programs for customers that are affordable, safe, and accessible to all. DER products and programs are an important aspect of the clean energy transition that will help enable a reliable supply of electricity.

In the 2021 CEIP, the Commission approved specific targets for DER solar and DER storage of 80 MW and 25 MW by 2025, respectively. As outlined in the Biennial CEIP Update, PSE plans

[15] Included in Appendix K to the Biennial CEIP Update is a detailed overview of the incentives available to PSE's residential customers who enroll in the Flex Smart and Flex Rewards program as well as a detailed program marketing plan.

[16] A virtual power plant (VPP) is a cloud-based scheduler and controller that aggregates DERs for system peak capacity management. In 2021 PSE selected AutoGrid as the VPP vendor. The following year, PSE and AutoGrid worked together to design and implement a functional VPP platform. The platform allowed the manual enrollment, monitoring, aggregation, forecasting, dispatch, reporting, and management of DERs. This technology capability is focused on behind the meter resources. For more information about PSE's VPP efforts, please see the Biennial CEIP Update at 5.48 and 5.49.

[17] Additional discussion of PSE's planned resource acquisition activities is provided in Section 6.1 below.

to spend the remainder of the 2022-2025 four-year compliance period working to meet these solar and storage targets.

PSE's approach to DER programs has moved beyond the illustrative, initial set of potential DER programs in the 2021 CEIP. As PSE works to conceptualize and develop a full suite of programs, PSE is engaging with the Conservation Resource Advisory Group and the Equity Advisory Group to develop individual programs that meet customer needs in a way that is also responsive to Condition 8 of Order 08. Furthermore, PSE will develop a new or revised DER process as part of the 2027 integrated system plan that is (1) consistent with the DER planning process outlined in RCW 19.280.100 and (2) transparent, technology neutral and robust in its comparison of DER programs considering cost and non-cost factors.

For 2026 and 2027, PSE plans to grow this DER portfolio in line with the modeling from PSE's 2023 Electric Resource Progress report, which demonstrated higher potential for DERs over the compliance period. Please see Table 7 below, which sets forth PSE's proposed increases to the cumulative specific targets for DER solar and DER storage for 2026 and 2027.

Table 7: DER Solar and Storage Specific Targets in 2026 and 2027 (cumulative)

Description	2026	2027
DER – Solar	110 MW	140 MW
DER – Storage	50 MW	75 MW

3.4. Energy Efficiency

Consistent with the existing conservation planning framework, PSE will work with the Conservation Resource Advisory Group and the Commission in 2024 and 2025 to prepare the next Biennial Conservation Plan, which will be filed in November 2025. Targets for conservation included in the next Biennial Conservation Plan will cover implementation during calendar years 2026 and 2027.

4. Embedding Equity and Delivering Customer Benefits

PSE continues to research and understand energy equity. This research has resulted in a better understanding of the subject, informed a framework for energy justice, and provided insights into how to operationalize equity within the clean energy transition. The Commission order in a proceeding involving Cascade Natural Gas Company[18] provided important guidance that shaped PSE's approach to energy equity. In this order, the Commission suggests that utilities in

[18] *Wash. Util. Transp. Comm'n v. Cascade Natural Gas Corp.*, Docket UG-210755, Order 09 (Aug. 23, 2022).

Washington start with the four tenets of energy justice: recognition, procedural, distributional, and restorative justice.

Consistent with this energy justice framework, the following sections describe the actions that PSE will take in 2026 and 2027 to continue to advance understanding and operationalization of energy equity to deliver on CETA's requirement that all customers benefit from the clean energy transition.

4.1. Overview of Energy Equity Efforts at PSE

PSE identifies and acknowledges energy equity in its clean energy operations and has adopted the definition of energy equity proposed by the University of Michigan, School for Environment and Sustainability's Energy Equity Project:

> *"Energy equity recognizes the historical and cumulative burdens of the energy system borne by frontline and low-income communities and Black, Brown, and Native people. To eliminate these disparities, energy equity centers the voices of frontline communities in energy planning and decision-making and ensures the fair distribution of clean energy benefits and ownership."*[19]

PSE worked with its Equity Advisory Group on its approach to conceptualizing energy equity. In collaboration with the Equity Advisory Group, PSE hosted two equity forums with its advisory group members, community-based organizations, and community members to broaden discussions of equity approaches to include a wider set of customers and community organizations. Those events represent a model for ongoing engagement and will further support PSE's understanding of what energy equity means to customers in named communities. PSE believes this is the kind of engagement the Commission envisioned in expecting "meaningful engagement" with the Equity Advisory Group, named communities and interested persons.[20]

Additionally, in accordance with PSE's energy equity guiding principles, which are transparency, accountability, and simplicity, PSE published an external public webpage (https://www.pse.com/en/about-us/energy-equity) in 2024 to communicate its commitment and demonstrate progress on energy equity. This includes publishing a strategic equity framework, progress in the four energy justice tenets, named communities map, and the Equity Investment Zones map.

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[19] University of Michigan School for Environment and Sustainability, Energy Equity Project Framework Report, v1.0 (2022), available at https://energyequityproject.com/wp-content/uploads/2022/08/220174_EEP_Report_8302022.pdf

[20] *See* Order 08, at ¶ 313.

4.2. Energy Equity Work Plan Actions

Below, PSE outlines the various Work Plan actions that it intends to take during 2026 and 2027.

4.2.1. Recognition Justice

Recognition justice requires an understanding of historic and ongoing inequalities and prescribes efforts that seek to reconcile these inequalities. The key elements of recognition justice thus far in PSE's implementation include (1) identifying, defining, and mapping named communities and (2) identifying and tracking disparities in the clean energy system.

CETA defines named communities to be comprised of highly impacted communities and vulnerable populations. PSE has made progress in mapping locations of highly impacted communities and vulnerable populations, and this mapping tool has been used by operations and planning teams across the PSE enterprise in their work, including the delivery system scorecard, which facilitates joint system planning and integrated resource planning. In consultation with the Equity Advisory Group, PSE also defined vulnerable population classification factors that led to the development of three levels of vulnerability (low, medium, and high) that cover all customers in PSE's service territory. In 2026 and 2027, PSE will primarily be focusing on customers in highly impacted communities and/or high vulnerability as named community customers. These are the communities that experience the strongest compounding effects of the factors being measured, and these are the customers where the distribution of benefits and reductions of burdens will be targeted.

In furtherance of PSE's recognition justice efforts, PSE also intends to take the following actions:

- PSE will further refine its understanding of customers that are in deepest need, consistent with Condition 2 from the Commission's order approving the Biennial CEIP Update;[21] this work will include refining the utility's understanding of the existing burdens, barriers, and disparities within customer segments, and this work will be considered in the disparities and root factors report for energy efficiency.
- PSE will also complete its energy burden analysis for the 2023 calendar year and update the identification of customers in deepest need with this updated analysis; this work will help identify and inform PSE's actions and programs to reduce energy burden for customers in 2026 and 2027.

[21] *See* Order 12, at ¶ 16 ("Deepest Need: PSE will set a minimum designation of energy benefits to customers in deepest need that is at least equal to that subset's proportion of electric customers in the Company's 2025 CEIP. PSE will continue to work with its advisory groups and other interested persons as appropriate to refine the definition of deepest need. If the Company finds that investments to meet this standard are not reasonable given costs or other considerations, the Commission will consider this as a factor when considering compliance at the end of the first compliance period.").

4.2.2. Procedural Justice

Procedural justice involves creating an inclusive and accessible process for the authentic engagement and representation of communities that have been historically excluded or marginalized in the development and implementation of clean energy programs.

Robust public engagement is essential to ensure community voices are infused throughout the design, implementation, and evaluations of clean energy programs. PSE's approach to community engagement is achieved through identifying and prioritizing areas of community need, building relationships with community-based organizations, meeting communities and individual customers where they are, and engaging in two-way interactive communication.

In 2023, PSE began work on the Distributed Energy Resources Public Engagement "Empowerment" Pilot, which stems from Condition 27 in the Commission's Order 08 approving the 2021 CEIP. This work builds from previous efforts to directly engage customers in named communities in program design and involves PSE teams and representatives from the NW Energy Coalition and Front and Centered. The purpose of this pilot is to gain experience with and understanding of engaging customers in named communities at the "empowerment" level of the International Association of Public Participation public participation spectrum. PSE intends to collaborate with and empower customers in named communities to design a new or modified DER program for which PSE will seek Commission approval to implement. This work is ongoing through 2024 and early 2025.

Additional information on procedural justice actions can be found in the public participation section 5 below.

4.2.3. Distributional Justice

Distributional justice is the fair distribution of benefits and burdens across populations. This objective aims to ensure that historically marginalized and vulnerable populations do not receive an inordinate share of the burdens or are denied access to benefits. Directing the benefits of a clean energy system to communities that have been historically and currently marginalized is at the core of distributional justice. As it relates to PSE's progress towards achieving CETA's goals, the key elements of distributional justice include definition and use of customer benefit indicators (CBIs) and associated metrics, identifying barriers and burdens across named communities, and the minimum designation of benefits across PSE customer programs.

PSE incorporated energy equity considerations in its distribution system planning and corporate capital planning process. PSE plans to continue making refinements to these processes as it learns more over time from ongoing equity work.

PSE is partnering with Lawrence Berkeley National Lab (LBNL) on a Distributional Equity Analysis (DEA) pilot to develop a decision support tool and an accompanying practical guide for enhancing traditional cost-effectiveness tests for distributed energy resources with recognition

of distributional equity.[22] The DEA practical guide was published nationally in May 2024.[23] PSE plans to apply the methods and standards developed in the DEA to other areas throughout PSE in future years to guide distributional equity work.

In addition, in 2024, PSE developed an energy equity questionnaire as a method to consider equity in its resource acquisitions and future Request for Proposals (RFP). For RFPs going forward (see below section 6.1), this method will obtain information from developers to integrate equity in the procurement decision-making process. Based on the questionnaire, PSE conducts an energy equity analysis in preparation for executive and board decisions. This analysis entails a review of equity considerations across the four energy justice tenets, which includes an analysis of the distribution of benefits and burdens and CBI impacts.

CBIs and the associated metrics developed in the 2021 CEIP are important to distributional justice. CBI metrics are intended to illustrate how PSE's customers benefit from the clean energy transition and document progress over time. Most of the initial CBI metrics remained in place for the Biennial CEIP Update. The Commission's Order 08, however, required PSE to add two CBIs, two new metrics to an existing CBI, and remove one CBI. PSE is also currently working on identifying a "public health" indicator and is looking to enlist support from the University of Washington to help develop a better indicator and metric. This work will continue in 2024, including discussions with the Equity Advisory Group on this and other CBIs.

In this Work Plan, PSE also proposes to continue providing 30 percent minimum energy benefits designated for named communities and making progress toward the proportional minimum designation for deepest need customers throughout all PSE customer programs. In response to Condition 2 in Order 12, PSE plans to propose an updated minimum designation of energy benefits to customers in the deepest need that is at least equal to that subset's proportion of electric customers as part of its 2027 integrated system plan.

Table 8: Baseline for energy benefits in named communities (current PSE population in HIC: 32%; VP High: 33%)

Tranche of Resources	2022	2023
Energy Efficiency	51%	52.9%
Distributed Solar (community solar and solar grant programs)	44.4%	40.5%
Distributed Storage*	N/A	N/A
Demand Response*	N/A	37.4%

[22] PSE filed its progress with the Commission on March 22, 2024 in Docket UE-220066.

[23] Distributional Equity Analysis for Energy Efficiency and Other Distributed Energy Resources: A Practical Guide, May 2024, available at: https://emp.lbl.gov/publications/distributional-equity-analysis.

Table 9: Baseline for energy benefits for deepest need customers (current PSE population in deepest need: 6%; Biennial goal by end of 2025: 2.5%)

Tranche of Resources	2022	2023
Energy Efficiency (residential, excluding new construction programs)	7.68%	6.72%
Distributed Solar (community solar program only)	14.29%	9.88%
Distributed Storage*	N/A	N/A
Demand Response*	N/A	2.90%

* New, emerging programs

PSE recognizes the need to revise how programs are designed and developed to meet the minimum designation of 30 percent of energy benefits for named communities. In alignment with Order 08, Condition 21, PSE has already begun to implement mechanisms that intentionally serve customers in named communities. PSE's engagement with its community, Equity Advisory Group, Conservation Resource Advisory Group, and contractors help foster understanding and validate existing barriers and the desired benefits of different products and services. The following table illustrates the design components PSE incorporated in new DER programs.

Table 10: New DER Design Components Resulting from CEIP Order 08, Condition 21: DER Program Design

CEIP order text	Design component in tariff filing	Community engagement input
"developing targeting for named communities beyond using income as the sole criterion for program eligibility;	Expanded, flexible, eligibility criteria.	• Upfront costs were consistently highlighted as the largest barrier to adoption; customers preferred upfront incentives and programs with low to no initial cost • Participants highlighted the importance of energy independence and community or personal energy resilience • Benefits should be available to all communities, including historically disadvantaged communities that have been left out of programs like these in the past
"offering higher incentives for low-income customers and named communities;"	Higher incentives for customers that qualify as a vulnerable population customer, as defined in the tariff filing.	
"and targeting storage programs to vulnerable populations where increased reliability would reduce vulnerabilities."	Higher incentives for customers that qualify as a reliability-focused customer, as defined in the tariff filing.	

In the area of Community Solar, PSE is taking several steps to improve outreach and ability to capture customers with the deepest need. First, PSE is co-marketing community solar with the new Bill Discount Rate at events to sign customers up for programs, further increasing on-bill benefits. Second, PSE has launched a Spanish language campaign that included in-language outreach events at Latin markets in named communities.

Going forward, PSE is working to expand its information technology capabilities to build out the requirements and capabilities for a multi-tenant solar product that will allow solar benefits to flow to the residents of multi-tenant properties. This alone does not address deepest need and PSE

is pursuing other options to specifically target these customers. For example, PSE intends to work with low-income housing providers to secure state funding and pass benefits on to low-income residents, with a particular focus on communities with deepest need.

PSE begins by working with existing, longstanding programs in energy efficiency to understand further deepest need customer demographics and housing type characteristics, current levels of engagement, and current and prior levels of participation. With these insights, PSE will then implement:

- Appropriate channels, messaging, and tone to raise awareness of customers with the deepest need about energy assistance programs and clean energy solutions to reduce energy burdens
- Priority language and/or culturally sensitive collateral development
- Public engagement with the aim to streamline entry-points into the full menu of residential clean energy programs

Much of what is learned from this research in energy efficiency programs may be translated to use for demand response and DER programs.

4.2.4. Restorative Justice

Restorative justice uses interventions to disrupt and address distributional, recognition, or procedural injustices, and to correct them through laws, rules, policies, orders, and practices. To advance restorative justice, PSE will use an integrated approach built on the other three core tenets of energy justice – recognition, procedural, and distributional justice. Efforts to address recognition justice (by identifying customer groups that have been excluded from the clean energy system) set up the context to advance procedural justice, by ensuring that these customer groups can meaningfully participate in the design, planning and implementation of clean energy programs, and distributional justice, by ensuring that they are prioritized to receive the benefits of the clean energy system. The result of these efforts furthers restorative justice.

In this Work Plan, PSE proposes to continue the progress made in this area by committing to take the following actions prior to 2027:

- Continued participation in the Commission's equity docket (A-230217) and ensuring PSE decisions across business units and processes incorporate energy equity.
- Continued work to achieve at least 30 percent minimum energy benefits by tranche of DER resources to named communities and minimum designations for deepest need as discussed in the previous section.

5. Delivering Equitable and Meaningful Engagement

In alignment with the concept of procedural justice discussed above, PSE developed a strategy for conversations and dialogue with community members, with an emphasis on deepening its understanding of existing barriers and building relationships through community organizations. Since 2021, PSE has engaged with customers, particularly those in named communities, in conversations supporting ongoing engagement, program design, and specific topics like defining deepest need. These engagements resulted in recommendations and decisions supporting new and refined programs and critical definitions and approaches.

PSE explored a range of new approaches and tactics, including but not limited to joint meetings with advisory bodies, empowering Equity Advisory Group members to form a steering committee and participate in grant selection panels, and hosting two equity forums with more to come. This dialogue with interested parties, advisory bodies, and customers resulted in a greater understanding of how best to develop and design programs, products, and services, and deliver a more just clean energy transition.

In 2023, PSE convened a Resource Planning Advisory Group and began hosting public webinars to inform development of the 2025 Integrated Resource Plan. That model has worked well, and PSE intends to continue both approaches in support of the 2027 integrated system plan. Soon after the Commission approves PSE request to begin work on the 2027 integrated system plan, PSE will develop a public engagement plan, similar to what is required for an integrated resource plan, that will outline engagement efforts related to the 2027 integrated system plan. PSE will continue to engage with advisory groups, including the Resource Planning Advisory Group, the Equity Advisory Group, and the Conservation Resource Advisory Group, on specific topics, such as planning for the 2027 integrated system plan, and those related to system planning, such as, transmission, changes to conservation plans and programs in light of the Large Combination Utilities Decarbonization Act, clean energy and equity targets, and other topics related to CETA.

In addition, robust public participation will continue, with an increased focus on reaching customers in named communities and deepest need, consistent with the conditions from the Commission's approval of the 2021 CEIP and 2023 Biennial CEIP Update. PSE will use lessons learned from engagement thus far to continue efforts to engage customers in all aspects of the clean energy transformation through public meetings, direct outreach, diverse engagement, education, and awareness programs.

PSE's CEIP Customer Education and Awareness Program (CCEAP) continues to make inroads engaging named communities with clean energy awareness campaigns and experiential learning opportunities. CCEAP is continuously striving to better understand named communities through qualitative research, quantitative research, and community listening methods to gauge

clean energy familiarity and understand value systems around clean energy. Initial research and community listening audiences include tribal communities, rural communities, communities facing language access barriers, and young BIPOC audiences, ages 17-24. Research findings, community listening, and input from community partnerships will inform the specifics around education and tactical development. To reach customers where they are, CCEAP has launched an ongoing rural peer-to-peer mentor outreach pilot and is developing tailored education and awareness messaging. Other efforts planned include audience-specific messaging campaigns through their preferred channels and localized, on-the-ground engagements through community events, interactive engagements, and partnerships with community organizations. The program is focusing on where these customer groups are already going to for information and resources to help inform and engage them on the clean energy transition and how they can be a part of it.

6. Additional Work Plan Actions

To support and achieve the goals set forth in this Work Plan, PSE will act in areas that span acquisition, planning, operations, and information technology. The following is a summary of key planned actions in these areas, which further demonstrate PSE's continuation of "reasonable progress" under CETA, consistent with section 3(3) of the Large Combination Utilities Decarbonization Act. These actions will occur at various stages between the filing of this Work Plan and the submission of an integrated system plan in early 2027.

6.1. Resource Acquisition

In addition to pursuing shorter-term clean energy acquisition opportunities as discussed above, PSE continues to pursue adding electricity from new clean energy resources over the longer-term through the 2021 All-Source RFP and other opportunities to secure clean resources. As outlined below, PSE plans to issue additional RFPs this year and during the Work Plan period to secure additional clean resources.

- PSE anticipates issuing a voluntary All-Source RFP in 2024 to continue to secure clean energy resources to meet its long-term CETA and capacity needs.
- On May 20, 2024, PSE issued a voluntary 2024 Distributed Solar and Storage RFP to solicit proposals for additional DER solar and storage resources that will support PSE's achievement of the specific targets proposed in this Work Plan and beyond.
- PSE plans to issue additional RFPs as needs are identified, including a 2025 voluntary distributed solar and storage RFP and potentially additional voluntary targeted and/or All-Source RFPs prior to 2027, pending the outcome of the 2024 voluntary All-Source RFP.
- In addition, PSE plans to issue a targeted Request for Information for demand response in 2024, which may lead to potential additional targeted RFPs for demand response in 2025 and 2026. The purpose is to procure demand response programs specifically for customers within named communities.

6.2. Transmission and Deliverability

PSE continues to evaluate and acquire renewable and nonemitting resources necessary to meet its goals. However, PSE faces several obstacles in acquiring the needed volume of renewable and non-emitting resources in the very near term. For example, many projects bid into PSE's 2021 All-Source RFP delayed their commercial operation date to 2026 or later (i.e., after the four-year compliance period of the 2021 CEIP). More importantly, the unprecedented demand for clean energy resources has created transmission constraints across the Northwest with specific issues getting energy into the Puget Sound Region. Bonneville Power Administration (BPA) has experienced incredible growth in the amount of capacity requesting interconnection to its transmission system and due to that stated they will be unable to deliver additional resources to the Puget Sound area until further transmission upgrades are complete in 2038. BPA has experienced an eightfold increase in generation capacity seeking transmission interconnection between 2016 (2 GW) and 2023 (16 GW) with 2025's queue requests already at 25 GWs.[24]

PSE's 2023 Electric Progress Report analysis revealed a significant need for grid improvements that allow increasing amounts of intermittent resources to work in concert to serve customer energy needs.[25] The grid will require considerable development in transmission capacity to bring utility-scale wind and solar to PSE's service territory. There are considerable challenges to develop, permit, construct and complete those developments to support the required transition to clean energy.

Considering these dynamics and identified challenges, PSE will complete a transmission and deliverability analysis that will evaluate the need for additional transmission and specific transmission investments necessary to enable achievement of PSE's clean energy goals. PSE will complete this analysis with the Resource Planning Advisory Group before 2027. This work will establish a basis for more robust transmission system planning processes in the 2027 integrated system plan.

6.3. Investing in the Distribution System

For years, PSE has been investing in the modernization of the grid. The 2021 CEIP helped to bring visibility to some of the fundamental capabilities needed for the electric grid in preparation for clean energy transformation. These efforts fall into the three categories of: Substation Supervisory Control and Data Acquisition (Sub SCADA); resiliency enhancement; and Circuit Enablement – DERs and Microgrids. PSE will take the following actions in 2026 and 2027 to

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[24] *See* Bonneville Power Administration (May 16, 2024), *Evolving Grid: Update on Transmission Activities*, at 35, available at: PowerPoint Presentation (bpa.gov).

[25] *See, e.g.*, 2023 Electric Progress Report, Chapter Two: Clean Energy Action Plan, Sec. 5 (Resource Deliverability).

support investments in the distribution system that facilitate progress towards achieving CETA's requirements.

- PSE will continue to invest in and implement grid modernization plans.
- PSE will execute on the approved 2025-2026 multiyear rate plan, which is proposed to include: electric capacity upgrades to support growing load requests as more customer end-use loads are electrified and the quantity of personal, fleet and public electric vehicle chargers continues to grow; enable local grid integration of distributed clean energy resources; maintain service reliability in the midst of increasingly severe weather events driven by climate change; and advance grid modernization and automation for efficient operation.
- PSE will continue to improve tools and methodologies to site DERs where there are electric system needs; this includes PSE's efforts to develop a refreshed version of a hosting capacity map to optimize DER siting and identify whether DERs benefit named communities.
- PSE will continue to develop and pilot targeted electrification as a non-pipeline alternative, which will inform PSE's capabilities relative to the 2027 integrated system plan.

6.4. DER Enablement

Achieving CETA's goal of ensuring an equitable clean energy transition for all customers requires investments that enable PSE to design, launch, and manage a growing portfolio of DER pilots, programs, and resources efficiently and effectively. The Biennial CEIP Update provides an update on major work streams and the associated enablement activities and actions.[26] In addition, PSE will make the following DER enablement investments in 2026 and 2027:

- PSE will continue developing and implementing strategies and processes to support the addition of additional DER resources, including DER asset management, interconnection, and operating processes.
- PSE will continue to integrate additional use cases and resources into PSEs' Virtual Power Plant. Current use cases are limited to demand response; however, PSE intends to explore other uses including system peak management and local capacity management.
- PSE will continue to use a coordinated approach to information technology billing system upgrades to deliver new functionality and services to support DER programs, as well as new products and services supporting CETA goals. This effort includes expanding the Time Varying Rates Pilot implemented in 2023 into a full offering for all PSE electric customers.
- PSE will continue to deliver enhancements that will improve customer experience and adoption of DER programs and products. This effort includes implementation of a new

Customer Relationship Management (CRM) tool and enhancements to customer experience design and delivery across PSE's portfolio of products and services.

6.5. Transportation Electrification

PSE is committed to ensuring equitable access to the benefits of transportation electrification. As a trusted utility, PSE is uniquely positioned to support market transformation for transportation electrification, which accounts for 45 percent of the state's emissions, a disproportionate amount of which impacts the most vulnerable communities. PSE's Transportation Electrification Plan, acknowledged by the Commission in 2021, detailed a portfolio approach to support customers through a suite of robust education and outreach tools, and products and services, to address charging infrastructure gaps and mechanisms to manage the associated loads.

PSE is working, in partnership with customers, to support their electrification goals and the load requirements that come with them. Anticipating where new loads will be added and identifying load managements solutions will be key to the statewide transition to more electric transportation solutions. PSE is working on the design and demonstration of new rate strategies in support of greater load management. This work will continue and contribute to the development of PSE's first integrated system plan in 2027.

During the Work Plan period, PSE will also continue to provide customers with access to PSE's portfolio of Up&Go products and services offered under Commission-approved tariff schedules, while initiating technology demonstrations to assess vehicle-to-everything, agricultural electrification, and other capabilities to further advance customer options.

6.6. Public Funding

PSE continues to actively pursue opportunities to leverage state and federal public funding that accelerate PSE's efforts to implement CETA while reducing costs for customers. PSE tracks emerging opportunities, then evaluates and documents which opportunities align with its goals and determines which opportunities are best suited to PSE applications and which opportunities PSE can help customers apply for with partnership support and technical assistance as necessary. PSE is building a strong track record partnering with customers to support their clean energy funding opportunities. Outlined below are actions PSE has taken to date and plans to take during the Work Plan period.

Federal Funding and Tax Incentives

In April 2024, PSE submitted two Grid Resilience and Innovation Partnership (GRIP) grant submissions for Topic Area 1 (Resiliency) and Topic Area 3 (Innovation):

- Topic Area 1: PSE submitted a $92 million proposal to mitigate all-hazards threats, enhance reliability, resiliency, and energy security in the Skagit River Valley through strategic undergrounding, deployment of real-time situational awareness devices, and installation of black-start generation and micro grid capabilities leveraging the Baker Hydroelectric Project.
- Topic Area 3: PSE, as part of the North Plans Connector GRIP Grant consortium, submitted a $1 billion proposal to establish a new 3,000 MW connection between Montana and North Dakota to bridge the gap between the Western and Eastern Interconnects. If awarded, PSE would be expected to invest $800 million (contribution and cost share) for 750 MWs of capacity.

PSE is participating in three grant consortium efforts for the second round of the GRIP Topic Area 2 (Smart Grid) grant cycle with applications due on May 24, 2024:

- PSE is proposing an approximately $50 million project to mitigate and reduce the impacts of all-hazards threats on the grid through the deployment of software and hardware technologies including: satellite-based vegetation management, Pano cameras, Gridware sensors, weather stations, and BoxPower microgrids.
- PSE is proposing an approximately $15 million project to leverage a technology platform to quantify climate risks and investment benefits for optimal deployment of battery energy storage systems (BESS) solutions including five BESS systems in total.
- PSE is proposing an approximately $5 million project for vehicle-to-grid technology demonstrations that will increase energy resiliency.

PSE is a member of the consortium known as the Pacific Northwest Hydrogen Association (PNWH2), selected by the Department of Energy for award negotiations. The consortium is eligible for up to $1 billion in federal funding. As part of the effort, PSE is specifically pursuing capital funding for a hydrogen-fueled peaker plant. If awarded, PSE would be able to build, own, and operate a zero-carbon dispatchable electric generating facility that helps provide a stable source of clean energy for PSE customers.

PSE's under-construction utility-scale windfarm, Beaver Creek, is eligible for tax credits under the Inflation Reduction Act (IRA). Further, PSE continues to evaluate the IRA provisions for potential benefits around electric vehicle (EV) and other customer products such as heat pumps, hydrogen production and investment, carbon capture and sequestration, and other areas aligned to PSE's strategic focus.

PSE is also in conversation with the U.S. Department of Energy Loan Programs Office to assess the applicability of the Title 17 Clean Energy Financing Program.

State Funding

PSE has recently received two Washington Department of Commerce Clean Energy Fund awards to support grid modernization work. This funding will enable analysis and design for a backup power system to be planned at Tenino High School and a feasibility study evaluating the use of storage and other technologies to increase resiliency and capacity in the Kittitas region.

PSE has recently submitted applications for a number of state funding opportunities:

- PSE applied for funding through the EV Charging Program. PSE was the lead applicant for two multifamily projects and a partner applicant on over 100 other proposed projects.
- PSE submitted a $375,000 proposal under the Washington Department of Commerce's Community Decarbonization Grants to partner with the Nooksack Valley School District to develop and test demand response process for school districts across Washington.

PSE is currently developing two applications for the WA Commerce Clean Energy Projects solicitation, which is making $34 million available to support planning, design, and construction of clean energy projects, as well as an application for the State Home Electrification and Appliance Rebates Program.

7. Conclusion

PSE has made, and continues to make, reasonable progress towards achieving CETA's requirements while ensuring that energy equity is at the center of the planning, designing, and implementing clean energy programs and resources. This Work Plan highlights targets and near-term actions that will help us continue to build a reliable, diversified power portfolio of renewable and non-emitting resources, ensure an equitable clean energy transition for all customers, and ensure resource adequacy and affordability. PSE remains committed to these near-term actions but recognizes that significant challenges and work remain on the journey to achieving CETA's long-term requirements.

Forecasts and resource additions may change as rules and policies surrounding the Large Combination Utilities Decarbonization Act are adopted, as technology advances, as customer use patterns and resource costs change, and as clean fuel options and wholesale energy markets evolve. This Work Plan helps bridge the gap between the legacy planning processes of the past and implementation of Large Combination Utilities Decarbonization Act. This Work Plan also provide visibility and transparency into how PSE's near-term actions and transition to the new integrated system planning framework build upon the strong foundations underpinning the Commission-approved 2021 CEIP and Biennial CEIP Update.