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May 17, 2021

SENT VIA WUTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
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05/17/2021 11:33
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Puget Sound Energy's Draft 2021 Request for Proposals for All Sources,
Docket UE-210220

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in response to the Notice of Opportunity to File Written Comments on Puget Sound Energy's (PSE) Draft Request for Proposals Pursuant to WAC 480-107. Public Counsel believes that the Commission should approve PSE's request for proposal (RFP) filing and wishes to highlight several improvements over previous RFP filings.

Public Counsel's Recommendation

Public Counsel recommends the Commission approve PSE's 2021 Request for Proposals for All Sources.

In PSE's prior all source RFP filing, we raised concerns with PSE's approach to its evaluation criteria.¹ PSE's current filing contains more comprehensive information about how the Company will evaluate proposals, including a detailed rubric.² We also note the inclusion of how PSE will evaluate each bidder's equity plans and other information required by the Clean Energy Transformation Act (CETA). We particularly appreciate the Company's discussion of how it will address maximizing customer benefit indicators in its recently filed revision.³

Public Counsel also appreciates the steps the Company is taking to incorporate suggestions from stakeholders into this draft RFP. After PSE's April 1 initial filing, they have made a subsequent

¹ Public Counsel Initial Comments, *Puget Sound Energy Proposed Request for Proposal* (July 6, 2020) Docket UE-200414.

² See PSE Attach. A, Draft All-Source RFP, Exh. A at A-6 and A-7 (May 10, 2021).

³ *Id.* at A-3.

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filing with changes and updates. The Company also stated in their cover letter to the updated filing that they may make an additional filing before the final UTC decision to incorporate feedback received during the public comment period.

We appreciate the opportunity to provide comments and look forward to reviewing other stakeholder comments and further discussion at the open meeting. If you have any questions about this filing, please contact either Stephanie Chase at (206) 521-3212 or via email at Stephanie.Chase@ATG.WA.GOV, or Sarah Laycock at (206) 389-3879 or via e-mail at Sarah.Laycock@ATG.WA.GOV.

Sincerely,

/s/ Lisa W. Gafken
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