Agenda Date:	April 9, 2009
Item Number:	A1
Docket:	U-090366
Company Name:	Puget Sound Energy
Staff:	David Nightingale, Sr. Regulatory Engineering Specialist

Recommendation

Issue an order approving Puget Sound Energy's (PSE's) request for an exemption from the filing deadline in WAC 480-100-238(4) and WAC 480-90-238(4), thereby allowing the company to file its 2009 integrated resource plan (IRP) on July 30, 2009, instead of May 30, 2009, a two month temporary extension.

Background

On March 9, 2009, PSE filed a petition requesting a one-time modification of the filing date for its 2009 IRP from May 30, 2009, to July 30, 2009. The company's previous plan was submitted on time.¹

Discussion

In its petition, the company explains that due to unforeseen economic conditions that have occurred since it ran its modeling in July 2008, it would be advisable to update and rerun certain key modeling assumptions to reflect more current and significantly different conditions, such as falling fuel prices and economically-influenced load demand. PSE contends that the two month time extension will allow it to provide an IRP that is not obsolete at the time of filing, and thereby will serve the public interest. The potential for a two month delay in filing the 2009 IRP was discussed at the March 17th IRP advisory group meeting, and no opposition was expressed.

In addition to staff's review of PSE's past performance of on-time delivery of IRPs, the company was on schedule with the original filing date of May 30th. Because the selection and timing of the lowest reasonable cost resource is strongly impacted by the accuracy of the load forecast and significant changes in fuel prices, granting the exemption would more appropriately serve the public interest and the underlying purpose of the IRP rule.

Conclusion

Staff has reviewed the company's petition and believes that it is reasonable to grant the company's request because updated modeling improves the accuracy of the selection and timing of the lowest reasonable cost resource. Therefore, staff recommends the commission enter an

¹ See Dockets UE-071063 and UG-071074

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order approving PSE's request for an exemption from the filing deadline in WAC 480-100-238(4) and WAC 480-90-238(4), thereby allowing the company to file its 2009 integrated resource plan on July 30, 2009.