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Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

**Re: Petition of Puget Sound Energy for a Declaratory Order Clarifying CCA
Electrification Requirements, Docket UG-240884**

Dear Executive Director Killip,

With the attached Petition filing, Puget Sound Energy (“PSE”) respectfully requests that the Washington Utilities and Transportation Commission (the “Commission”) issue a declaratory order clarifying and setting forth PSE’s obligations under the Climate Commitment Act (“CCA”) in light of Initiative Measure No. 2066 (“I-2066”)¹ and PSE’s 2024 General Rate Case (“GRC”) Final Order.²

In December 2024, the Commission issued an order³ in this docket approving PSE’s proposal to allocate \$7.7 million from the 2025 CCA no-cost allowance auction proceeds to continue PSE’s Voluntary CCA Decarbonization Programs, which PSE launched in 2024,⁴ in 2025. However, in the Commission’s 2024 GRC Final Order, the Commission rejected PSE’s proposal for a decarbonization tracker and a Phase 2 of a Targeted Electrification Pilot, in part due to the restrictions imposed by I-2066.

Given the interrelation between the CCA, I-2066, Engrossed Substitute House Bill (“ESHB”) 1589, the Commission’s 2024 GRC Final Order, and the Commission’s Order 01 in this Docket UG 240884, PSE is filing this Petition to seek clarity from the Commission on whether PSE may to implement the 2025 Voluntary CCA Decarbonization Programs (as they were approved in Docket UG-240884) or whether the 2025 Voluntary CCA Decarbonization Programs as currently designed are inconsistent with I-2066 (as the Commission determined with TEP Phase 2 in the 2024 GRC Final Order).

¹ *Washington State, Secretary of State*. Initiative Measure No. 2066. Filed April 5, 2024.
<https://www2.sos.wa.gov/_assets/elections/initiatives/finaltext_3177.pdf>

² *Washington Utilities and Transportation Commission (“WUTC”) v. Puget Sound Energy*, Dockets UE-240004 & UG-240005 (consolidated), Order 09 (Jan. 15, 2025) (the “2024 GRC Final Order”).

³ *WUTC v. Puget Sound Energy*, Docket UG-240884, Order 01 (Dec. 20, 2024).

⁴ *WUTC v. Puget Sound Energy*, Docket UG-230968, Order 01 (Dec. 22, 2023).

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For the reasons explained in the attached Petition, PSE respectfully requests that the Commission enter an order declaring that: In light of passage of I-2066,⁵ the Commission determined that PSE may still continue to spend its 2025 CCA proceeds for targeted voluntary decarbonization programs, as approved in Docket UG-240884.

PSE respectfully requests that the Commission issue the declaratory order within 30 days from the filing date of this Petition, pursuant to WAC 480-07-930 and RCW 34.05.250.

Please contact Kelima Yakupova, State and Regional Policy Consultant in PSE Regulatory Policy, at (425) 462-3588 or Kelima.Yakupova@pse.com. If you have any other questions, please contact me at (425) 462-3051.

Sincerely,

/s/ Wendy Gerlitz

Wendy Gerlitz
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cc: Service List

Attachments:

PSE's Petition for a Declaratory Order Clarifying CCA Electrification Requirements
Certificate of Service

⁵ *Washington State, Secretary of State*. November 5, 2024 General Election Results. Last updated on 11/26/2024.
<<https://results.vote.wa.gov/results/20241105/measures-all.html>>