



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

November 6, 2019

Filed Via Web Portal

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

Received
Records Management
11/06/19 11:00
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket UE-180607 & UG-180608: Comments of Puget Sound Energy regarding UTC Staff’s petition for exemption from WAC-480-100-238(4)-(5) and WAC 480-90-238(4)-(5)

Dear Mr. Johnson:

Puget Sound Energy (“PSE” or the “Company”) files this letter in support of Commission Staff’s petitions to exempt investor owned utilities (IOUs) from current electric and natural gas Integrated Resource Plan (IRP) filing requirements until December 31, 2020 and provide a progress report by November 15, 2019.

PSE agrees with Staff that an exemption at this time will allow utilities and other stakeholders to properly consider new statutory requirements under the Clean Electricity Transformation Act (CETA) and new rules being written by the Commission and other agencies to implement the law. PSE plans to participate in the rulemakings and views the implementation process as critical to providing utility guidance necessary to comply with parts of CETA such as creating a clean energy action plan (CEAP), clean energy implementation plan (CEIP) and other provisions. PSE supports Staff’s proposed 2021 due dates for the next IRP and encourages the WUTC to begin the Electric IRP Updates Rulemaking in docket UE-190698 in late 2019 or early 2020 so that the IRP rules are able to be included in the development of the 2021 IRP.

PSE also supports Staff’s recommendation that utilities file a progress report at the Commission by November 15 and agrees such a report is consistent with existing WAC rules. PSE currently plans to file a progress report by November 15 that includes a response to the electric and natural gas action plans from PSE’s 2017 IRP; an updated needs analysis for capacity, energy, and renewable energy; updated power price forecasts; and a demonstration of the public participation and consultation PSE conducted during the 2019 IRP cycle.

In conclusion, PSE supports Staff's petition and will provide a progress report to the Commission by November 15. Please contact Irena Netik at (425) 462-3671 for additional information about these comments. If you have any other questions please contact me at (425) 456-2142.

Sincerely,

/s/ Jon Piliaris

Jon Piliaris
Director, Regulatory Affairs
Puget Sound Energy
PO Box 97034, EST07W
Bellevue, WA 98009-9734
425-456-2142
Jon.Piliaris@pse.com

cc: Lisa Gafken, Public Counsel
Sheree Strom Carson, Perkins Coie