



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

December 17, 2021

Filed Via Web Portal

Ms. Amanda Maxwell, Executive Director and Secretary
 Washington Utilities and Transportation Commission
 621 Woodland Square Loop SE
 Lacey, WA 98503

Received
 Records Management
 12/17/21 09:21
 State Of WASH.
 UTIL. AND TRANSP.
 COMMISSION

Re: UE-210795: Puget Sound Energy 2021 Clean Energy Implementation Plan

Dear Ms. Maxwell:

Consistent with the requirements of General Order R-601 in Dockets UE-191023 and UE-190698 and Washington Administrative Code (WAC) 480-100-640, Puget Sound Energy (“PSE”) is pleased to submit its 2021 Clean Energy Implementation Plan (“CEIP”). PSE is filing this final CEIP on December 17, 2021 pursuant to the deadline established in Order 01 Granting Petition for Exemption and Motion for Continuance Subject to Conditions in Docket UE-210571 (“Order 01”). The attached CEIP is also posted at cleanenergyplan.pse.com and available for download.

In order to successfully achieve the ambitious interim and specific targets proposed in this plan, PSE requests timely consideration of this CEIP. For the purposes of providing predictability and certainty to PSE’s ongoing procurement processes and allowing PSE to move forward in implementing this CEIP, PSE seeks a Commission review process that will result in a decision on its CEIP in 2022. Delays beyond this timeframe will jeopardize PSE’s ability to achieve the targets in this first CEIP.

In the CEIP, PSE outlines its plans to demonstrate reasonable progress in the period from 2022 through 2025 to meet the Clean Energy Transformation Act (“CETA”) 2030 clean electricity standard by accelerating its clean electricity plans over the next four years to meet an ambitious yet achievable interim target of 63%. The investments laid out in the plan maintain our commitment to providing accessible, reliable and affordable clean energy.

The final CEIP incorporates a number of elements that were still under development when the draft CEIP was filed on October 15, 2021, including: (1) a more comprehensive discussion of highly impacted communities, vulnerable populations, and customer benefit indicators (CBIs) in Chapter 3, with baseline data included for most CBIs; (2) updated costs, including correcting the

transmission costs used in modeling and updating resource cost assumptions in response to feedback from stakeholders; and (3) incorporating PSE's final biennial conservation plan in the energy efficiency target and associated costs.

PSE's CEIP is the product of a robust public participation process. Since April of 2021, PSE has engaged customers, community-based organizations and advisory groups, including its new Equity Advisory Group, to inform the plan development. PSE will continue the dialogue with these advisory groups, organizations, and customers throughout the CEIP implementation period.

CETA's requirements to "*ensure that all customers are benefitting from the transition to clean energy*"¹ [emphasis added] require utilities to approach resource planning in new ways, incorporating a broad set of customer benefits that necessarily requires substantial outreach to and input from new voices, as well as seeking new sources of information and data for analysis and decision-making. PSE did its best to meaningfully incorporate customer and advisory group perspectives in this first CEIP, although the nine-month timeframe and the ongoing challenges of the remote nature of the pandemic were limiting factors in this endeavor. PSE looks forward to building on this first CEIP's efforts in customer engagement to continually evolve and improve this area of work going forward.

In this plan, PSE outlines a number of potential customer programs, particularly new programs pertaining to Distributed Energy Resources and Demand Response, which will require partnering with customers, including highly impacted communities and vulnerable populations, in order to be successful. PSE respectfully requests that the Commission grant PSE a waiver of WAC 480-100-223 so that PSE can effectively communicate these program offerings to customers to ensure that customers enroll in the programs needed to implement the CEIP.

Additionally, although PSE will be notifying customers of the CEIP through a media release, its website, and January bill inserts, some customers may receive bill inserts outside the 30 day period prescribed by WAC 480-100-655(3). While this WAC rule is silent on the form that customer notices must take, out of an abundance of caution, Commission staff is requesting that PSE seek an exemption from this WAC, and staff supports PSE's request. Therefore, PSE is formally seeking from the Commission an exemption from WAC 480-100-655(3) related to this filing. Further, to ensure ample comment opportunity for all customers, PSE supports the Commission electing to extend the comment period for the CEIP to 75 days after the filing date to ensure all customers have at least 30 days to provide written comments as specified in WAC 480-100-645(1).

Importantly, PSE reiterates that in order to be successful in achieving the interim and specific targets outlined in this plan within the four-year implementation period, PSE seeks timely consideration of this CEIP. PSE suggests that the CEIP schedule be considered in coordination with other related procedural schedules, including the calendar for PSE's forthcoming multi-year rate plan, the 2021 All-Source Request for Proposals ("RFP") and the Distributed Energy Resources ("DER") RFP. PSE's 2021 All-Source RFP process is already well underway, with

¹ RCW 19.405.040 (8)

proposals for over 21 GW of new resources.² In order to provide predictability and certainty to the RFP processes and allow PSE to move forward in implementing this CEIP, PSE seeks a Commission review process that will result in a decision on its CEIP in 2022. Any delay beyond that will most certainly impede PSE's ability to successfully achieve the specific and interim targets outlined in this plan.

While PSE has taken every action to limit the confidential information in this filing, please note that the enclosed work papers are marked as CONFIDENTIAL per WAC 480-07-160. Such CONFIDENTIAL information contains valuable commercial information, including trade secrets or confidential marketing, cost or financial information, of PSE and other entities and, pursuant to RCW 80.04.095, is not subject to inspection or copying under Chapter 42.56 RCW.

If you have any questions about the information contained in this filing, please contact Kara Durbin at (425) 456-2377. 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

Attachments:

PSE 2021 Clean Energy Implementation Plan
Appendix A-L

- Appendix A1-3 – AURORA Modeling and Detailed Input/Output Data
- Appendix B – 2022 – 2023 Biennial Conservation Plan
- Appendix C0-7 – Public Participation Plan Current and Future
- Appendix D1-7 – DER Suite Selection and Evaluation
- Appendix E1-2 – Incremental Cost Calculation
- Appendix F – Detailed Costs by Program Area
- Appendix G – Grid Modernization Strategy
- Appendix H – Customer Benefit Indicator Metrics
- Appendix I – PSE Clean Energy Implementation Plan Compliance Matrix
- Appendix J – 2021 Conservation Potential Assessment
- Appendix K – Black & Veatch Cost Report

² Puget Sound Energy 2021 All-Source RFP: Proposal Summary Report filed in Docket UE-210220.

Appendix L – CEIP Programs and Actions Master Table
Work papers - AURORA Modeling and Detailed Input/Output Data (C)
Work papers - AURORA Modeling and Detailed Input/Output Data (R)
Certificate of Service