



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

July 16, 2014

***Filed via Web Portal and Overnight Courier***

Mr. Steven V. King, Secretary and Executive Director  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, Washington 98504-7250

**Re: Docket Nos. UE-141170 and UG-141169  
Petition for Exemption from WAC 480-100-238 and WAC 480-90-238  
Integrated Resource Planning**

Dear Mr. King:

In this petition, Puget Sound Energy, Inc. (“PSE” or the “Company”) respectfully requests the Commission’s authority to modify the filing date for its 2015 Integrated Resource Plan (“IRP”). Per WAC 480-100-008, WAC 480-90-008 and WAC 480-07-110, PSE is requesting an exemption of WAC 480-100-238(4) and WAC 480-90-238(4), which are the timing provisions of the electric and natural gas utility IRP rules, respectively. WAC 480-100-008 and WAC 480-90-008 provide that the Commission may grant an exemption from the provisions of any rule in WAC 480-100 and WAC 480-90 respectively, if consistent with the public interest, the purposes underlying the regulation, and applicable statutes.

PSE requests approval to change the filing date of its 2015 IRP from May 30, 2015, to September 30, 2015. Further, PSE requests the Order allow the Company to shift to a July 15 IRP filing schedule starting with its 2017 IRP. The following petition describes why this petition is in the public interest and how it is consistent with the underlying purposes of the Commission’s Integrated Resource Planning rules.

Please note the Company has discussed this request with Commission Staff and several other external stakeholders. The primary focus was on the conservation target-setting process with the Company’s Conservation Resource Advisory Group (“CRAG”) which builds on information from the IRP. CRAG members were comfortable the revised schedule would not create issues with the target-setting process and were generally supportive of using an updated forecast.

**Petition**

**Request Supports the Public Interest**

To meet the current May 30, 2015 IRP filing deadline, PSE would need to rely on a load forecast developed in the third quarter of 2013. In discussions with stakeholders, several expressed concerns with using an older load forecast. PSE would also prefer to use its updated 2014 load forecast, which will provide more up-to-date assumptions and facilitate better transparency of the load forecast process. The 2014 load forecast is not yet completed. Changing the filing date to September 30, 2015 will allow the

Company time to complete and consider the 2014 load forecast for the 2015 IRP. A change to the IRP filing date will clearly provide the Commission, our customers, and stakeholders with better information than filing an IRP that does not reflect up-to-date information. Therefore, the Company believes this petition clearly supports the public interest.

PSE is requesting this Order in accordance with WAC 480-90-238(4) and 480-100-238(4), which state:

(4) Timing. Unless otherwise ordered by the commission, each electric[/natural gas] utility must submit a plan within two years after the date on which the previous plan was filed with the commission. Not later than twelve months prior to the due date of a plan, the utility must provide a work plan for informal commission review. The work plan must outline the content of the integrated resource plan to be developed by the utility and the method for assessing potential resources.

Attached, please find a draft Order for the Commission's consideration.

#### **Consistent with the Underlying Purposes of the IRP Rules**

PSE's request to extend the filing date is consistent with the underlying purposes of the IRP rules. The purpose of the Integrated Resource Planning rules are specified in WAC 480-100-238(1) and 480-90-238(1), for electric and gas utilities:

**WAC 480-100-238 Integrated resource planning.** (1) Purpose. Each electric utility regulated by the commission has the responsibility to meet its system demand with a least cost mix of energy supply resources and conservation. In furtherance of that responsibility, each electric utility must develop an "integrated resource plan."

**WAC 480-90-238 Integrated resource planning.** (1) Purpose. Each natural gas utility regulated by the commission has the responsibility to meet system demand with the least cost mix of natural gas supply and conservation. In furtherance of that responsibility, each natural gas utility must develop an "integrated resource plan."

The Company believes the opportunity to rely on a more current load forecast will have a direct impact on the accuracy and transparency of its IRP planning process. Overall, the Company's petition clearly supports the underlying purposes of the Integrated Resource Planning rules in WAC 480-100-238 and 480-90-238.

#### **Revised IRP Work Plan Filing**

On May 29, 2014, PSE filed its 2015 IRP Work Plan in Docket Nos. UE-141170 and UG-141169. If this exemption is granted, PSE will file an updated 2015 IRP Work Plan by August 29, 2014. The Company has an IRP Advisory Group Meeting scheduled for July 28. Changes to the meeting schedule will be discussed at that meeting. The updated Work Plan filing will reflect changes to the meeting schedule that have been informed by this dialogue. This will provide the Company with an opportunity to review the external stakeholder meeting schedule and discuss any changes that will be necessary, given the new schedule.

**Conclusion**

PSE respectfully requests the Commission issue an Order (1) allowing an exemption of the IRP filing date provisions of WAC 480-100-238(4) and WAC 480-90-238(4), authorizing the Company to file its 2015 IRP no later than September 30, 2015, and (2) to shift to a July 15<sup>th</sup> IRP filing schedule starting in 2017. This will facilitate a better informed and more transparent IRP process now and in the future. Such exemption would be in the public interest and consistent with the underlying purposes of the IRP rules.

Please contact Phillip Popoff at 425-462-3229 with any question or concerns about this filing or me with other questions or concerns at 425-456-2110.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Johnson", with a long horizontal flourish extending to the right.

Ken Johnson  
Director, State Regulatory Affairs

Attachment

cc: Simon ffitc  
Juliana Williams  
Don Trotter