COMMISSIO

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

June 1, 2022

Filed Via Web Portal

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

Re: Dockets UE-190905 and UG-190913 2020-2021 Biennial Report of Conservation Accomplishments

Dear Ms. Maxwell,

Pursuant to requirements outlined in WAC 408-109-120(4) and WAC 480-07-140(5), attached please find the 2020-2021 Biennial Report of Electric and Natural Gas Conservation ("Biennial Report") for Puget Sound Energy ("PSE").

Results outlined in the Biennial Report summarize results provided in PSE's 2020 and 2021 Annual Reports of Energy Conservation Accomplishments ("Annual Reports") and true-up electric and natural gas savings that are verified after annual reporting deadlines.

PSE filed electric savings in its 2020 and 2021 Annual Reports that, prior to adjustments for items excluded from penalty, totaled 355,809 megawatt-hours (MWh). The adjustments resulted in the reduction of 2,320 MWh. The resulting verified PSE 2020-2021 first-year electric savings, as measured at the customer meter, were 353,489 MWh. As described in the 2018-2019 Biennial Report, PSE carried forward into the 2020-2021 biennium, excess savings in the amount of 58,509 MWh. Combining the verified savings with the two previous biennia of excess savings arrives a total of 411,998 MWh for purposes of penalty calculations. The combined target used in the penalty calculation includes the EIA Penalty Threshold of 410,633 and Decoupling Penalty Threshold of 21,710 MWh, for a combined total of 432,343 MWh. This results in a 95% achievement of the combined penalty target during the 2020-2021 biennium.

In 2020, following the onset of the COVID-19 pandemic, the Washington State Legislature modified RCW 19.285.040(1)(e) to consider a utility in compliance with its biennial acquisition target for cost-effective conservation when conditions beyond its reasonable control prevent it from meeting the conservation target.

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Puget Sound Energy has detailed the circumstances surrounding the pandemic and efforts taken to achieve the target in the attached Biennial Report and requests that PSE be considered in compliance with its biennial target for the 2020-2021 biennium.

PSE's 2020 and 2021 Annual Reports originally reported aggregate natural gas savings after removal of items excluded from the penalty calculation of 6,467,281 therms. These adjustments totaled 316,497 therms. Therefore, the total verified PSE 2020-2021 first-year natural gas savings, as measured at the customer meter, were 6,773,578 therms. This compares with a Natural Gas Penalty Threshold of 6,160,000 and Decoupling Threshold of 308,000 therms, or 6,468,000 therms combined. As a result, the Biennial Report shows a 105% achievement of the overall target.

In addition to the overview, the Biennial Report contains eight attachments:

- 1) Exhibit 1: 2020-2021 Savings and Expenditures;
- 2) Exhibit 1, Supplement 1: BECAR Final Report;
- 3) Exhibit 1, Supplement 2: 2020 HER Evaluation Summary;
- 4) Exhibit 1, Supplement 3: 2021 HER Evaluation Summary;
- 5) Exhibit 1, Supplement 4: Building the Biennial Targets Tables;
- 6) Exhibit 1, Supplement 5: Commerce EIA Conservation Report;
- 7) Exhibit 2: 2020-2021 Cost-Effectiveness Results;
- 8) Exhibit 7: Regulatory Requirements Checklist.

Consistent with WAC 480-109-110(3), PSE provided an electronic version of the Biennial Electric Conservation Report to the CRAG on May 2, 2022.

Please contact Dan Anderson at (425) 501-0971 or dan.anderson@pse.com for additional information about this filing. If you have any other questions, please contact me at (425) 456-2142.

Sincerely,

/s/Jon Pílíarís

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

Attachments:

UE-190905-UG-190913-PSE-2020-2021-Biennial-Report-Of-Conservation-Achievements.pdf

UE-190905-UG-190913-PSE-Exhibit-1-2020-2021-Savings-and-Expenditures.xlsx

UE-190905-UG-190913-PSE-Exhibit-1-Supp-1-2020-2021-PSE-BECAR-FINAL.pdf

UE-190905-UG-190913-PSE-Exhibit-1-Supp-2-2020-2021-PSE-HER-2020-Savings-Memo-FINAL.pdf

UE-190905-UG-190913-PSE-Exhibit-1-Supp-3-2020-2021-PSE-HER-2021-Savings-Memo-FINAL.pdf

UE-190905-UG-190913-PSE-Exhibit-1-Supp-4-2020-2021-Building-the-Targets.xlsx

UE-190905-UG-190913-PSE-Exhibit-1-Supp-5-2020-2021-PSE-EIA-2022-

ConservationReportWorkbook.xlsx

UE-190905-UG-190913-PSE-Exhibit-2-2020-2021-Cost-Effectiveness-Results.xlsx

UE-190905-UG-190913-PSE-Exhibit-7-2020-2021-Requirement-Compliance-Matrix.pdf