



**Bob Ferguson**  
**ATTORNEY GENERAL OF WASHINGTON**

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May 15, 2020

**VIA UTC WEB PORTAL**

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

Received  
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05/15/20 09:31  
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COMMISSION

Re: *Puget Sound Energy's Petition To Modify the Biennial Conservation Target, Penalty Threshold, Decoupling Commitment and Ten-Year Potential,*  
Docket UE-190905

Dear Mr. Johnson:

On April 15, 2020, Puget Sound Energy (PSE or "Company") submitted a petition containing modifications to its electric Biennial Conservation Target, penalty threshold, decoupling commitment and Ten-Year Conservation Potential as required by Order 01 in the docket. Public Counsel respectfully submits the comments below and recommends approving the Company's petition.

Public Counsel actively participated in Conservation Resource Advisory Group (CRAG) meetings during the formation and development of the Company's ten-year achievable conservation targets and the subsequent Biennial Conservation Plan (BCP) to achieve that target. Our participation included the January 27, 2020 meeting where the draft results were presented to inform the 2020-21 target updating process. Throughout the whole process, the Company provided a great deal of information, was receptive to suggestions from all involved stakeholders, including Public Counsel, and provided timely, thoughtful responses. Public Counsel values PSE's willingness to collaborate actively with CRAG members.

Public Counsel appreciates the Company's detailed BCP and all of the work that went into its creation and subsequent updates. Though there is a good amount of uncertainty resulting from the Covid-19 coronavirus pandemic and its impact on energy efficiency programs, the Commission should approve PSE's petition to modify its BCP targets and thresholds.

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To: Mark L. Johnson  
Re: Docket UE-190905  
Date: May 15, 2020  
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Questions can be directed to Stephanie Chase at (206) 491-7649 or [stephanie.chase@atg.wa.gov](mailto:stephanie.chase@atg.wa.gov).

Sincerely,

*/s/ Stephanie K. Chase*  
STEPHANIE K. CHASE  
Regulatory Analyst  
Public Counsel Unit  
Washington State Office of the Attorney General