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Jeff Killip, Executive Director and Secretary

RE: Docket UE-231031 Puget Sound Energy's Electric Tariff Revision The Washington State

I would like to express its full support of Puget Sound Energy's revised tariff filing of January 18, 2024.

RCW 80.60 establishes a minimum net metering requirement of "four percent of the utility's highest demand in 1996." This requirement is not a limit, and there are several utilities that have exceeded the 4% threshold.

PSE is not required to end this tariff at any point, and the Commission is also not obligated to discontinue net metering at this threshold for any of the utilities it oversees. It is critical that the existing framework for net-metered solar remains unchanged statewide until the completion of a study by the Washington State Academy of Sciences. This study will include stakeholders, experts, voices of environmental justice organizations, and important metrics that were left out of the utility funded E3 study.

It's important that a comprehensive, broad-based analysis be used to guide the adoption of a successor rate to net metering.

PSE has also noted that potential solar customers are uncertain about whether or not PSE will discontinue net metering for new customers. Approval from the Commission for this filing would immediately alleviate any confusion and provide the transparency and assurance that prospective solar adopters need to make well-informed decisions about their solar investments over the next two years.

PSE possesses the capability to provide critical input to the Academy, ensuring that any concerns about equity and cost are appropriately addressed in the analysis. Once this step is completed, they can then move forward with implementing a revised tariff for net metering, considering the impartial and extensive data provided by the study.

Please approve PSE's temporary filing regarding Net Metering Schedule 150.

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