



PUGET SOUND ENERGY 2021 CLEAN ENERGY IMPLEMENTATION PLAN INFORMATION SHEET

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The Public Counsel Unit of the Washington Attorney General's Office represents the interests of residential and small business customers of electric, gas, water, and telecommunications companies and customers of transportation companies regulated by the Utilities Transportation Commission. Public Counsel advocates on behalf of customers before the Commission and courts regarding utility rates, mergers, business practices, service quality, energy efficiency, safety, and policy matters.

Public Comment Hearing: January 24, 2023, 6pm

The Washington Utilities and Transportation Commission (UTC) Commissioners appreciate hearing from members of the public and how the Company's proposed Clean Energy Implementation Plan (CEIP) will impact them. The UTC is holding a virtual public comment hearing to take comments on Jan. 24, 2023, at 6 p.m. You can participate and submit oral comments via the Zoom link below or by phone.

- Zoom: bit.ly/PSECEIPhearing
- Phone: dial (253) 215-8782 and use Meeting ID 883 8330 3191# and Passcode 733771#

Background on the Clean Energy Transformation Act

Under Washington's Clean Energy Transformation Act (CETA), utilities must ensure all electricity is greenhouse gas neutral by 2030 and greenhouse gas emission free by 2045. In order to ensure the utilities will hit these targets, CETA requires each utility to file detailed Clean Energy Implementation Plans (CEIPs) every four years laying out interim targets and detailing all the actions the utility is taking to make sure it will be in compliance with CETA's 2030 and 2045 mandates. Utilities are also required to file an update to each CEIP two years into each four-year CEIP cycle.

Puget Sound Energy's Clean Energy Implementation Plan Filing

On December 17, 2021, Puget Sound Energy (PSE) filed its CEIP with the UTC and requested approval of its interim target of 63 percent renewable energy by 2025 and timely approval of its plan. PSE requests the UTC approve its CEIP. PSE argues that its proposed interim targets are reasonable, its distributed energy resource subtargets are reasonable, its customer benefit indicators are adequate to begin measuring equitable distribution of benefits, its description of specific actions is adequate, and its methodology to measure CETA compliance costs is reasonable.

The Parties

The UTC considers the recommendations of every party, and no party's recommendation is considered binding. The following parties are participating in this proceeding:

- Puget Sound Energy
- UTC Staff*
- Washington Attorney General's Office, Public Counsel Unit (residential and small business customer advocate)
- The Energy Project (low-income customer advocate)
- Alliance of Western Energy Consumers (large industrial customer advocate)
- Front and Centered (marginalized communities of color advocate)
- Renewable Northwest (environmental advocate)
- Northwest Energy Coalition (environmental advocate)

*In formal UTC proceedings, regulatory Staff participates like any other party, and UTC Commissioners make the decision.





Public Counsel's Position on the Clean Energy Implementation Plan Filing

Public Counsel requests that the UTC approve the CEIP with conditions. The conditions would better align the CEIP with CETA goals, improve PSE's resource selection and public participation processes, and bring the plan in compliance with legal requirements.

- Interim target: CETA requires that utilities propose interim renewable energy targets during the four-year CEIP period. Public Counsel supports the PSE's proposed interim target of 63 percent renewable electricity by 2025.
- Customer benefit indicators and associated metrics: CETA requires utilities to identify specific customer benefit indicators (CBIs) and metrics to measure outcomes that ensure all customers benefit from the transition to clean energy. Public Counsel recommends the UTC require PSE to include CBIs and metrics that measure customer energy burden, arrearages, and disconnections. We believe PSE should include an updated set of CBIs and metrics in its 2023 two-year CEIP update as well as create a publicly accessible, comprehensive report card on all metrics PSE reports to the UTC.
- Distribution of benefits and burdens on customers: CETA requires utilities to equitably distribute benefits from the transition to clean energy to all customers and reduce the burdens and costs for highly impacted and vulnerable communities. Public Counsel recommends that the UTC require PSE conduct analysis to ensure equitable distribution of customer benefits, include the findings in its 2023 two-year CEIP update, and incorporate the equity analysis into its 2025 CEIP.
- Distributed energy resource selection: Distributed energy resources are small-scale electricity resources that can be deployed in specific neighborhoods or homes (e.g., rooftop solar, home battery storage) and provide localized benefits to customers. PSE's CEIP proposed a process for selecting distributed energy resources that improperly uses CBIs and metrics to select expensive projects that do not clearly provide benefits to vulnerable communities. Public Counsel recommends the UTC require PSE to remove its distributed energy resource selection process section from the CEIP.
- Specific actions: As CETA requires, PSE listed specific actions it plans to implement to meet its proposed renewable target. PSE's descriptions failed to adequately identify how each specific action would demonstrate progress towards the target at the lowest reasonable cost, equitably distribute customer benefits and burdens, and mitigate risks to vulnerable communities. Public Counsel recommends the UTC require PSE to update the narrative description of each specific action to include this information in the 2023 two-year CEIP update.

If you have questions, you can contact Public Counsel by email at: utility@atg.wa.gov, or by mail at: Attorney General's Office, Public Counsel Unit, 800 Fifth Avenue, Suite 2000, Seattle, WA 98104.

Process for Commission Decision

The UTC must approve the CEIP for the Company to pursue the actions outlined in its plan. The UTC may approve, approve with modifications, or reject the CEIP. The UTC will hold a public comment hearing on Jan. 24, 2023 and an evidentiary hearing Jan. 31 through Feb. 1, 2023, both held virtually.

Submit a Comment

In addition to participating at the public comment hearing, the public can submit comments in the following ways:

- Via UTC web form at: utc.wa.gov/consumers/
(click on "Submit a Comment" link at the bottom of the web page)
- By e-mail at: comments@utc.wa.gov
- By mail at: UTC, P.O. Box 47250, Olympia, WA 98504-7250
- By phone: 1-888-333-WUTC (9882)

Please include the following in your written comment: your name, mailing address, the name of the company (Puget Sound Energy), and Docket Number 210795. For more information, see <http://www.utc.wa.gov/>, or call 1-800-562-615