



Puget Sound Energy  
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February 1, 2019

***Filed via Web Portal***

Mr. Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

**Re: Dockets UE-180607 and UG-180608  
Petition for Exemption from WAC 480-100-238 and WAC 480-90-238  
Integrated Resource Planning**

Dear Mr. Johnson:

Attached please find Puget Sound Energy's ("PSE's") Petition for an Exemption from WAC 480-90-238 and WAC 480-100-238 to extend the filing date of its 2019 Integrated Resource Plan from July 15, 2019, to January 15, 2020.

Please contact Phillip Popoff at 425-462-3229 for additional information about this filing. If you have any other questions, please contact me at 425-456-2142.

Sincerely,

*/s/ Jon Piliaris*

Jon Piliaris  
Director, Regulatory Affairs  
Puget Sound Energy  
PO Box 97034, EST-07W  
Bellevue, WA 98009-9734  
425-456-2142  
[Jon.Piliaris@pse.com](mailto:Jon.Piliaris@pse.com)

Attachment: Petition

cc: Lisa Gafken, Public Counsel  
Kathi Scanlan, Commission Staff  
David Nightingale, Commission Staff  
Brad Cebulko, Commission Staff  
Steve Johnson, Commission Staff

**BEFORE THE  
WASHINGTON UTILITIES & TRANSPORTATION COMMISSION**

In the Matter of the Petition of  
PUGET SOUND ENERGY

For an Order Authorizing Exemption from  
WAC 480-90-238 and WAC 480-100-238,  
Integrated Resource Planning

Docket UE-180607  
Docket UG-180608

PETITION OF  
PUGET SOUND ENERGY

**I. INTRODUCTION**

1. In this petition, Puget Sound Energy (“PSE”) respectfully requests that the Commission extend the date for filing its 2019 Integrated Resource Plan (“IRP”) from July 15, 2019, to January 15, 2020.

2. Per WAC 480-100-008, WAC 480-90-008 and WAC 480-07-110, PSE requests 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.

3. PSE respectfully requests that the Commission allow PSE an additional six months to incorporate potential changes in applicable Washington legislation into the 2019 IRP. PSE also respectfully requests that this scheduling change be made permanent so that IRP’s will be due on January 15 of even numbered years beginning in 2020. A permanent change to the schedule seems reasonable so that future IRPs can take into consideration potential legislative

changes in future years. The following petition describes why this request is in the public interest and how it is consistent with the underlying purposes of the Integrated Resource Planning rules.

4. PSE has discussed this request with Commission Staff. The requested schedule update will still permit the conservation target-setting process to advance, in consultation with PSE's Conservation Resource Advisory Group ("CRAG"), which builds on information from the IRP.

5. PSE has an IRP Technical Advisory Group meeting scheduled for February 7, 2019 and that meeting will go forward as planned. In the coming weeks, PSE will reschedule external stakeholder meetings for the balance of the planning cycle. Those meetings will be rescheduled in consultation with Commission Staff and external stakeholders.

6. PSE is engaged in the business of providing electric and natural gas service within the State of Washington as a public service company and is subject to the regulatory authority of the Commission as to its retail rates, service, facilities and practices. Its full name and mailing address are:

Puget Sound Energy  
Attn: Jon A. Piliaris  
Director, Regulatory Affairs  
P.O. Box 97034  
Bellevue, Washington 98009-9734

## **II. SUPPORT FOR EXTENSION**

### **A. Request Supports the Public Interest**

7. There is significant activity in the Washington State legislature pertaining to reducing carbon emissions from the utility sector, and new laws are expected to be passed.

Under the current schedule, new laws passed this spring could not be incorporated into PSE's 2019 IRP. Given the uncertain outcome of this process, it would be in the public interest to pause development of the 2019 IRP and resume once legislative outcomes are known this spring. Such adjustment to the schedule will ensure PSE can begin the planning process under new state policies, rather than analyzing a host of scenarios/sensitivities that may be irrelevant in a few months, and miss the opportunity to begin implementing those policies sooner rather than later.

8. PSE also believes this updated schedule should continue for future IRP filings so that current policies can be incorporated. We have realized the current filing schedule does not adequately take into consideration the timing of legislative sessions. This may not be the last legislative session that addresses climate change or other issues impacting the composition of PSE's resource portfolio. Changing the filing dates to accommodate future legislative sessions would avoid having to file extension petitions in the future, which is in the public interest. PSE respectfully requests an order from the Commission in accordance with WAC 480-90-238(4) and 480-100-238(4), which state as follows:

(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.

**B. Consistent with the Underlying Purposes of the Integrated Resource Planning Rules**

9. PSE's request to extend the filing date is consistent with the underlying purposes of the following Integrated Resource Planning rules 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.”

10. PSE could file an IRP by July 15, 2019, but such a filing would not reflect policy direction from the 2019 legislative session. Therefore, PSE believes this petition supports the underlying purposes of the Integrated Resource Planning rules in WAC 480-100-238 and 480-90-238.

### **C. Revised IRP Work Plan Filing**

11. PSE will file an update to the public participation process to complete the IRP filing process following the anticipated WUTC Order approving this extension, consistent with the following:

**1. Meeting Schedule:** The revised Work Plan will include rescheduled IRP Advisory Group and IRP Technical Advisory Group meetings. PSE will coordinate with Commission Staff and engage with its Technical Advisory Group members to reschedule remaining meeting dates.

**2. Distribution of Draft IRP:** PSE will distribute a draft IRP to external stakeholders on or before November 15, 2019.

**3. Filing of Final IRP:** PSE will file the final IRP on or before January 15, 2020.

**D. 2020-2021 Biennial Conservation Plan**

12. PSE will submit its 2020-2021 Biennial Conservation Plan (“BCP”) on or before November 1, 2019 in accordance with RCW 19.285 and WAC 480-109-120. The BCP outlines PSE’s approach to acquiring electric energy efficiency savings, which is derived using the most recently completed Conservation Potential Assessment (“CPA”). Given the IRP modeling, which includes the CPA modeling, will not be completed by November 2019 under PSE’s proposal to delay the 2019 IRP (as outlined above), PSE plans to use the current, 2017 IRP as the baseline for setting targets for the 2020-2021 BCP.

**III. CONCLUSION**

13. 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 PSE to file its 2019 IRP on or before January 15, 2020, and (2) allowing this filing schedule for future IRPs. 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.

DATED this 1<sup>st</sup> day of February, 2019.

**Puget Sound Energy**

By /s/ Jon Piliaris  
Director, Regulatory Affairs  
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PO Box 97034, EST-07W  
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425-456-2142  
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**VERIFICATION**

STATE OF WASHINGTON )  
  )  
COUNTY OF KING )            ss.

Jon A. Piliaris, being first duly sworn, on oath deposes and says:

That he is Director, Regulatory Affairs with Puget Sound Energy, that he has read the foregoing Petition of Puget Sound Energy for An Exemption from WAC 480-90-238 and WAC 480-100-238, that he knows the contents thereof, and that he believes the same to be true to the best of his knowledge and belief.



\_\_\_\_\_  
Jon A. Piliaris

SUBSCRIBED and SWORN to before me this 1st day of February, 2019.



Print Name: Denise K Schroeder  
Notary Public in and for the State of Washington,  
residing at SNOQUALMIE, WA  
My commission expires: 8-1-21