

November 4, 2019

To: Irena Netik – Puget Sound Energy (PSE) Director of Energy Supply Planning and Analytics

Cc: Jay Balasbas – UTC Commissioner
Rachel Brombaugh – King County Executive Energy Policy & Partnerships Specialist
Brad Cebulko – UTC Staff
Carla Colamonici – Regulatory Analyst, Public Counsel Division
David Danner – Utilities and Transportation (UTC) Commission Chair
Lisa Gafken – Assistant Attorney General, Public Counsel Unit Chief
Steve Johnson – UTC Staff
Ann Rendahl – UTC Commissioner
Deborah Reynolds – UTC Staff
Kathi Scanlan - UTC Staff

Subject: 2019 IRP Technical Input – 2019 IRP Data Request

Note: The TAG acknowledges the WUTC Staff petition for an IRP schedule exemption. This technical input is submitted in response to PSE's commitment to "continue to ... maintain and respond to public input". This technical input should be considered an integral part of the collection of 2019 PSE IRP documents. We appreciate PSE's commitment to also include these technical inputs in the 2021 PSE IRP.

Members of the TAG met on Friday, November 1, 2019, to discuss the UTC Staff petition to cancel the 2019 Integrated Resource Plan (IRP). While we understand UTC Staff rationale for this petition, we also understand that it is important to continue providing technical inputs and to continue to evaluate progress towards Washington's clean energy future.

To that end, TAG members identified key data, some of which are covered by open 2019 IRP action items which PSE has consistently indicated would be answered in the 2019 IRP document. Separately, we will request that document be produced. This email identifies specific 2019 IRP analysis results or answers to fundamental planning questions that will allow the TAG to continue our technical contributions. Since these issues will be relevant for the 2021 IRP, the TAG is asking PSE to provide this information now.

The TAG formally requests that PSE post this letter on your 2019 IRP website with these 2019 IRP data items:

- The results of the 2019 IRP sensitivity analysis which includes no new fossil fuels beyond 2030.
- The average cost of wind, solar, battery storage and pumped hydro systems in bids received by PSE (not individual bids).

- Note: TAG research has acquired bid data which is significantly more affordable than renewable energy costs which are just a few years old. The TAG has provided this data to PSE. It is important to understand, particularly with CETA rulemaking underway, if the bid data that PSE is using for these same capabilities in their 2019 IRP analyses are consistent with TAG research.
- PSE has stated that renewable energy costs will increase. Please provide the reference data that indicates solar energy costs will increase.
- A list of PSE scheduled coal generation contract expiration dates and the MWH capacity of each contract.
- Full accounting of assumptions and modeling used to calculate upstream methane emissions.
- Full accounting of assumptions that went into forecast of a 20 percent increase in gas use for the gas utility used for peak loads over the 20-year IRP timeframe. Additional disclosure of expectation of gas use for the same period.
- Disclosure of the last 10 years of summer and winter demand peaks.
- Full disclosure of inputs used in Aurora, Plexos or any other models used to determine the preferred resource portfolio.

We also formally request PSE state, in writing, posted to the 2019 IRP website, your rationale for not providing any of the requested data items.

Respectfully submitted:

Kevin Jones – Vashon Climate Action Group