

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 – Make IRP data available

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.

PSE Response: PSE is working with full transparency, honesty and integrity.¹

Doug Howell: We need to get to the bottom of this issue of transparency. Sierra Club has nondisclosure agreements (NDA) with utilities in eight states² including with PSE’s previous owners Macquarie and British Columbia Investment Management so that they can turn over all the input files for modeling. If you don’t turn over those input files, all of those claims of transparency are hollow.³

The Integrated Resource Plan (IRP) process manages a complex system which include detailed models to characterize system performance and make informed resource management and future resource acquisition decisions. This complexity creates opportunities to achieve a range

¹ [2019 Integrated Resource Plan Technical Advisory Group Meeting #2](#), page 3

² These states include California, Minnesota, Indiana, Kentucky, Arkansas, Oklahoma, Texas and Louisiana. In Louisiana, Sierra Club has an NDA with Cleco Energy which is owned by previous PSE owners Macquarie and the British Columbia Investment Management Company.

³ Ibid, page 19

of outcomes, depending on how the system is modeled. External observation alone is insufficient to determine the appropriateness of the modeling.

Only by making modeling data, model inputs and analysis parameter settings available could an accurate assessment of modeling appropriateness be determined. To achieve a reasonable level of model evaluation, the Sierra Club has developed and successfully implemented a process to receive and protect the privacy of utility model input files.

PSE has frequently and publicly stated their policy to operate with full transparency, honesty and integrity. You can trust The Sierra Club to do the same. Providing IRP model input files under NDA would allow us to move beyond many unanswered questions, posed by both Technical Advisory Group members and the public, which currently jeopardize the transparency and integrity of the IRP process. Until that time, true PSE / TAG advocacy is not possible.

As TAG members, we formally request that PSE post this letter on their 2019 IRP website and provide a written response to these questions:

- Will PSE provide 2019 IRP input files to the Sierra Club under a nondisclosure agreement?
- If yes, when will the data be available?
- If no, what is the PSE rationale for not participating in this process which other utilities across the country have participated in?

Respectfully submitted:

Doug Howell – Sierra Club Beyond Coal Senior Campaign Representative