

Feedback report

RPAG Meeting

Meeting details

- Wednesday, July 17, 2024, 1:00 p.m. - 3:00 p.m.
- Virtual webinar hosted by PSE and facilitated by Triangle Associates
- Links to:
 - [Presentation](#)
 - [Meeting recording](#)

Feedback

The following table records participant questions and PSE responses from the public comment opportunity and comments submitted via online [feedback form](#) or irp@pse.com. Meeting materials are available on the IRP [website](#).

Note: PSE aims to provide clarity in responses but subsequent follow-up may be required at times. Please direct any follow-up clarifications to irp@pse.com.

No.	Date	Interested party	Submitted via	Question or comment	PSE response
1	7/17/2025	James Adcock	Public comment	The dog ate my homework, again. I'm expressing concerns about what by now has become a pattern of delays in Puget's efforts to meet CETA requirements which initially is to actually be 80% clean, 80% renewable energy delivered to customer load by 2030. When Puget starts an IRP process but then cancels it, and this happens over	In response to the passage of the Decarbonization Act for Large Utilities, which consolidates the Integrated Resource Plan (IRP) and Clean Energy Implementation Plan (CEIP) into a single Integrated System Plan (ISP), PSE successfully petitioned the Washington Utilities and Transportation Commission (Commission)

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				<p>and over again. And by CETA law only the remaining 20% made net zero by some other form of alternate compliance. I'm concerned that Puget is not planning to do this to actually be 80% clean delivered to customer load by 2030. Puget throws away the time and effort of everybody who has been involved in the IRP and RPAG process over and over again. Our RPAG is a sad joke when even those which Puget handpicked to represent the public, which of course they do not, but then even those people do not actually show up at the RPAG meetings, leaving the public represented by exactly nobody. I will note Puget started back in 2020 by foot-dragging on acquiring new additional renewables, claiming that these technologies would become cheaper later in time. But now instead renewables have become more expensive. Now Puget claims they cannot implement new renewables because they are too expensive. And then Puget claims that BPA needs to build new power lines which won't happen until after 2030, too late. When Puget knew about this problem, was developing a dozen years ago and could have asked BPA for transmission lines back then. And Puget has good solar and wind resources in their own territory, not BPA required. But now Puget is stuck in the mud predicting they will make no progress for several years. In</p>	<p>to suspend work on the 2025 IRP. PSE is reviewing public and RPAG feedback from the 2025 IRP cycle to consider for the 2027 ISP and will provide a summary prior to the Sept. 12, 2024 RPAG meeting.</p> <p>PSE is pursuing an “all of the above” approach to meet CETA obligations, and we are committed to understanding all resource opportunities and pursuing what makes the most sense for our customers in order to achieve Washington state’s goal of 100% carbon free electricity by 2045.</p> <p>PSE is making reasonable progress towards our clean energy goals, as stated in our Planning Transition Work Plan which was acknowledged by the Commission in approving our petition. In 2023 PSE signed three contracts for utility-scale clean energy resources totaling up to 782 MW, and three turnkey demand response contracts totaling nearly 86 MW. This includes the 248 MW Beaver Creek wind farm in Montana. In July 2024 PSE signed a power purchase agreement with Clearway Energy Group for a 315 MW wind farm in Montana.</p>

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				<p>summary, I can't imagine any other outcome than Puget will hit the 2030 wall without actually meeting the CETA 80% requirements. Please note my concerns what is happening is not right and is in no way just or reasonable.</p>	<p>In July 2024 we also issued a Voluntary All-Source RFP for energy from renewable and non-emitting resources and capacity resources.</p> <p>Further, PSE is currently engaged in ongoing negotiations involving supply-side wind, solar, and battery energy storage resources, and multiple distributed energy resource projects, further diversifying the generation technology mix and building upon the foundation of customer sited programs.</p>
2	7/17/2024	Don Marsh	Public comment	<p>I was to support Lauren McCloy's comment about getting customers involved in the planning process. As you know, many of us have stuck through this sort of dry spell of not being able to really engage in these RPAG meetings but we still have a lot of enthusiasm. We think this is very important work and now with ISP even more important. It's also a really great opportunity for PSE to look at public engagement and public participation and really embrace the broader vision. We've got a broader scope now and we need broader participation to make sure this really works. PSE and its customers have to work together to make this work and if you're not allowing customers to really participate there may be holes in the project or plan, or there might be insights that you missed. One thing is I think in the</p>	<p>Thank you for your feedback. PSE has two tracks for resource planning engagement: the RPAG and the public meeting track. The RPAG meeting format did not limit meaningful public participation for the 2025 IRP process. Comments and written feedback from members of the public on both public webinars and RPAG meetings are carefully considered regardless of format.</p> <p>PSE is reviewing public and RPAG feedback from the 2025 IRP cycle to consider for the 2027 ISP and will provide a summary prior to the Sept. 12, 2024 RPAG meeting.</p>

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				<p>past there was some nervousness about people abusing the process or hijacking meetings but now we've had four years of experience with Zoom and remote meetings and I really do think that with reasonable moderation policies that is somebody is abusing you can say "that's not really helping" and you can mute that person if necessary. There are voices out in the community that you do not want to mute, you do not want to miss the opportunities and the wisdom that's embodied in this community. I do hope that we will see opportunities for us to participate more than just two minutes at the very end of the meeting with no possible Q&A.</p>	
3	7/17/2024	Thomas Kraemer	Public comment	<p><i>Mr. Kraemer provided a written transcript of his public comment, which is show below in #5.</i></p>	
4	7/17/2024	James Adcock	irp@pse.com	<p>My brief feedback is that the "mural board" is not working for "Members of the Public", and when RPAG members "do things on the side" which do not display in the main Zoom display, then that prevents "Member of the Public" from actually being even able to view "The Meeting" as it is actually happening.</p>	<p>Thank you for your feedback. While PSE endeavors to provide transparency in the resource planning process, there are some technical limitations. In this case the facilitation team shared the Mural board on screen and the board is included in the July 17, 2024 RPAG meeting summary.</p>
5	7/22/2024	Thomas Kraemer	irp@pse.com	<p>PSE's Planning Transition Work Plan suggests that the primary goal of utility integration is to make the resource planning process more efficient, rather than meet the decarbonization and other goals of HB1589. PSE's commitments</p>	<p>HB 1589 does not include a ban on natural gas, and it does not change PSE's obligation to serve natural gas to our customers. As part of the integrated system plan (ISP) that we will submit</p>

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				<p>during the RPAG meeting, however, to achieve decarbonization and focus the planning process on customer needs were more encouraging. However, the first-listed purpose of the Decarbonization Act, as stated in the first sentence of legislative intent in Section 1 (5) is “to transition customers off of the direct use of fossil fuels...” The only “direct use of fossil fuels” offered by the utility is gas. Transitioning off gas is the primary goal. Reducing gas is not enough – PSE is required to transition off of it. Proportional emission reduction in 2050 will be net zero for everybody - there must be a progressive reduction that at least approaches proportionality along the way to this goal, including progressive decommissioning of gas plant through geographically targeted electrification as required by HB 1589.</p> <p>As noted on the slide 16 of the RPAG presentation, there are other specific requirements for the integrated system plan, per HB 1589, than the six quoted on the slide. In fact, there are over twenty additional specific requirements for the ISP. Several of the requirements include detailed assessments of various renewable alternatives, conservation and efficiency resources, supply side resources, DERs and other resources that may be</p>	<p>in 2027, we will be required to show what electrification is cost effective.</p> <p>PSE’s Targeted Electrification Strategy will be filed with the Commission by January 1, 2025. While this is not part of our resource planning process, we will endeavor to provide additional information to interested parties. The requirement for the TES predated the passage of HB 1589 and therefore does not include any elements from the new law.</p> <p>As you note, there are many requirements and details to be incorporated into the 2027 ISP, including elements of the Commission rulemaking expected to end in July 2025. The July 17, 2024 presentation aimed to preview the opportunities ahead.</p>

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				<p>available. These assessments are more granular than the usual resource assessments made at the planning level, and should result in fewer assumptions in developing scenarios. The combined result of all these required assessments should be a comprehensive evaluation of all potential distributed solar and wind resources that can be built or acquired within or in close proximity to the utility's service area, and for efficiency, supply side, conservation resources and demand response. This will provide a solid basis for writing resource-specific RFPs as well as transmission planning for resources that cannot be obtained within or close to PSE's service area.</p> <p>The schedule on slide 22 shows a targeted electrification strategy being filed in early Q4 of this year. This is encouraging. It's ahead of the rulemaking. Will this be filed with the UTC? Will it be available for public comment?</p>	
6	7/23/2024	Sommer Moser on behalf of Alliance of Western Energy Consumers (AWEC)	irp@pse.com	<p>AWEC appreciates the opportunity to comment on areas of interest and areas that would be potentially outside of the scope of PSE's ISP. AWEC is particularly concerned about rate impacts to customers that would flow from PSE's implementation, and it is not clear at this time how PSE plans to address rate impacts per the requirements of SB 1589. As noted during the</p>	<p>Thank you for your feedback. PSE shares your concerns about rate impacts to customers. This will certainly be a topic of discussion as we get deeper into development of the ISP.</p>

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				<p>RPAG meeting, AWEC considers affordability to be a particular challenge in implementing SB 1589's requirements. To that end, regardless of the timing of the Commission's rulemaking, PSE will need to integrate, at a minimum, the following during its Integrated System Plan development process:</p> <ul style="list-style-type: none"> • Per SB 1589 Section 3(2)(a), "[t]he statutorily required contents of any plan consolidated into an integrated system plan must be met by the integrated system plan." CETA includes a 2% incremental cost cap. This should be considered as a constraint when developing scenarios and targets. • Per SB 1589 Section 3(12)(b)(iv), the Commission must consider whether an integrated system plan "results in a reasonable cost to customers, and projects the rate impacts of specific actions, programs, and investments on customers." This raises two concerns that should be addressed in PSE's ISP development process. First, customer impacts must include analysis and discussion of impacts to all customer classes, not just residential customers. While it may be challenging to develop assumptions to develop estimated bill impacts to industrial customers, SB 1589 does not exempt PSE from meeting this requirement on a class-specific basis. To facilitate PSE meeting its statutory obligations, AWEC would be willing to work with PSE to ensure that anticipated 	

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				<p>rate impacts to industrial customers are meaningful. Second, cost impacts are required for “specific actions, programs and investments” on customers, which AWEC interprets to mean that rate impacts will be required on a more granular level, rather than on a portfolio basis. AWEC suggests making clear that within each “analysis” grouping, rate impacts by customer class be added.</p>	
7	7/24/2024	Joel Nightingale on behalf of Washington Utilities and Transportation Commission staff	irp@pse.com	<p>Staff appreciates PSE soliciting RPAG member input for how the group wants to engage in the 2027 ISP development. At a high level, Staff would like to focus on elements that are <i>new</i> in the ISP (i.e., did not exist, or played a relatively minor role, in previous IRP cycles), but understands that there are still some <i>existing</i> elements that may warrant further discussion. Staff is also interested in the overall modeling approach for the ISP. One opportunity of the ISP is a more holistic look at energy planning – across fuels, and from utility-scale generation to customer loads and everything in between – but this opportunity may not be achievable if modeling approaches remain unnecessarily siloed. Staff understands the 2027 ISP will be at the cutting edge of planning, but we do believe PSE should be transparent about the modeling approach, and especially <i>its limitations</i>.</p> <p>1. What tools is PSE planning to use in the development of the 2027 ISP? For each tool,</p>	<p>Thank you for your feedback.</p> <p>1. PSE is in the process of further evaluating what is needed and will create opportunities to discuss the numerous modeling processes with the RPAG. Given time constraints for RPAG meetings, we are also willing to review the modeling approach and dive deeper with staff as needed.</p> <p>PSE believes the process flow which was shared during the July 17, 2024 meeting mitigates any potential gaps in regard to our modeling framework. PSE does not have plans to combine delivery infrastructure planning and resource planning models for the 2027 ISP. The timeline for development of this ISP does not warrant a software/model change. PSE is engaged in conversations regarding potential future models that would combine these two aspects and will continue to consider this for future ISPs.</p>

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				<p>what function will the tool serve? Staff recommends that PSE bring a discussion of modeling tools to the RPAG: What tools does PSE <i>know</i> it will use? What tools is PSE <i>considering</i> using? What functionality gaps exist in these tools, and if no tools are available at this time, how will PSE deal with those gaps in its first ISP? Do any of the tools under consideration address integration of delivery infrastructure planning with resource planning?</p> <p>2. PSE presented its approach to including equity in its long-term planning (IRP) process and Staff appreciates the Company soliciting feedback in previous RPAG meetings about equity in the IRP process. ESHB 1589 (now codified as 80.86 RCW) includes ISP requirements that involve specific actions and implementation details. Given these more granular requirements, how will PSE's equity approach evolve? Will PSE incorporate a distributional equity analysis tool into the development of the 2027 ISP? If so, what resources/programs will it be applied to? If not, how will PSE analyze the distributional equity impacts of the plan?</p>	<p>2. These are excellent questions that will be addressed as the process moves forward. We are not able to respond definitively at this time. PSE will continue to use the energy justice tenets throughout each planning process and incorporate discussion from equity docket A-230217.</p> <p>3. PSE is rapidly developing an engagement strategy for the ISP to discuss with our advisory bodies in August and September. Additional details will be provided in the engagement plan we committed to filing by Oct. 31, 2024.</p>

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				<p>3. How is PSE reevaluating its public process in light of the shift from the 2025 IRP to the 2027 ISP? What adjustments does the Company plan to make to address feedback it has received (from RPAG members, and the public) on the current approach to engagement in planning? How do those adjustments (or the choice not to make adjustments, if that is PSE's approach) align with the "procedural equity" tenet of energy justice?</p>	
8	7/23/2024	Stefan DeVilliers on behalf of Public Counsel	irp@pse.com	<p>In light of PSE's recent approval to waive upcoming planning requirements in order to focus on its 2027 Integrated System Plan, Public Counsel thinks it would be helpful for a future RPAG meeting to include an update on PSE's progress towards its 2030 clean energy goals. We imagine such an update would include highlights from the workplan PSE filed in dockets UG-240433/UE-240434 to address its progress in the near term, but also go beyond the scope of that workplan to specifically address PSE's vision for its clean energy portfolio in 2030 and beyond.</p> <p>A bird's-eye view would be helpful in framing the RPAG's discussions as it digs into the 2027 ISP, which will carry PSE through 2029. If needed, this would also provide RPAG members an</p>	<p>Thank you for your feedback. PSE will be engaging RPAG members in a discussion about future meeting topics during our September 12 RPAG meeting and will consider this feedback.</p>

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				opportunity to comment on priorities and outstanding concerns regarding PSE’s progress towards 2030 goals in a more collaborative and informal venue than at the UTC.	