2025 Integrated Resource Plan feedback

This report summarizes public, Equity Advisory Group (EAG) and Resource Planning Advisory Group (RPAG) feedback from the 2025 Integrated Resource Plan (IRP) cycle for consideration in the 2027 Integrated System Plan (ISP). It is not intended to capture every individual comment which are included in feedback reports from each meeting on the PSE IRP website.

Equity

No.	Feedback	PSE response	Entity
1	Add an equity-focused organization to the RPAG	PSE's approach to addressing equity in resource planning is ongoing and broad reaching. We agree equity-focused representation on the Resource Planning Advisory Group (RPAG) would be valuable and recognize that no single solution is sufficient. PSE reached out to several energy equity-focused organizations for participation on the RPAG during the 2025 IRP cycle and will continue to mitigate barriers to their participation in the 2027 ISP cycle.	Public, RPAG
2	Prioritize equity	PSE is and will continue to prioritize equity in resource planning. We continue to evolve our approach for addressing equity in resource planning and recognize no single solution is sufficient.	RPAG, EAG
3	Ensure equity metrics avoid double counting attributes (electric, gas)	PSE will further refine metrics in the 2027 ISP to avoid double counting attributes.	RPAG, EAG
4	Continue to involve a diverse group of parties in developing our equity approach, especially the EAG (electric)	PSE will further evolve this approach and continue to involve diverse audiences in the 2027 ISP equity analysis.	RPAG
5	Include a qualitative assessment of equity metric (electric, gas)	PSE will consider this when evolving the approach to equity for the 2027 ISP.	RPAG, EAG
6	Explore methods beyond the proposed scorecard to measure equity in the planning process (electric)	PSE will consider this when evolving the approach to equity for the 2027 ISP.	RPAG
7	Reconsider gas equity metrics to align with electric equity metrics (gas)	PSE will work to better align gas and electric metrics when evolving the approach to equity for the 2027 ISP.	RPAG

No.	Feedback	PSE response	Entity
8	Introduce more nuance to equity metric scoring to better reflect the varying impact of different metrics (electric)	PSE will consider this when evolving the approach to equity for the 2027 ISP.	RPAG, EAG

Process

No.	Feedback	PSE response	Entity
9	Allow members of the public to engage in open dialogue during RPAG and/or public meetings.	The RPAG meeting format worked well during the 2025 IRP cycle. Although not required for an investor-owned utility, this approach is consistent with common practice for public entities who must comply with state law regarding public meetings (e.g., cities, counties, Washington Utilities and Transportation Commission). Lack of open dialogue in the RPAG meeting format in no way limits public participation as all comments submitted verbally or in writing are carefully considered. PSE welcomes live questions, written feedback, and public comment in our public webinars.	RPAG, Public
10	Use “meeting” instead of “webinar” format for public and RPAG meetings.	PSE intends to continue using the webinar format for RPAG and public meetings to ensure equitable participation for all who attend.	Public
11	Provide more engagements opportunities that are further to the right on the IAP2 spectrum (i.e., fewer “inform” topics).	Public webinars at the International Association of Public Participation (IAP2) “inform” are critical to ensuring resource planning topics are accessible and understandable to the public and help grow the number and diversity of participants. PSE will continue to engage the public and RPAG at various levels of the IAP2 spectrum, consistent with the IAP2 Core Values and PSE’s specific resource planning needs.	Public
12	RPAG chat and work processes should be visible to members of the public; PSE and RPAG members should not have private conversations.	PSE reserves the right to hold one-on-one conversations with any party as appropriate while also endeavoring to provide transparency in the resource planning process.	Public
13	Evaluate public participation to understand if it is working as intended.	PSE is in the process of evaluating the 2025 IRP engagement approach to inform 2027 ISP development and will provide an update at a future RPAG meeting.	RPAG

Electrification

No.	Feedback	PSE response	Entity
14	Provide transparency about the calculations for electrification costs to customers.	PSE will provide details about cost calculations in the 2027 ISP.	Public
15	Incorporate best practices related to electrification from other utilities (gas).	PSE is reviewing how other utilities are addressing electrification as part of our targeted electrification study that will be filed with the Commission in early 2025. The ISP team will consider and, where appropriate and feasible, incorporate lessons learned as part of our ISP planning process.	RPAG
16	All building electrification scenarios should be modeled as sensitivities in the IRP.	PSE is developing consistent gas and electric scenarios for the 2027 ISP, through engagement with our advisory bodies.	RPAG
17	Expand electrification scenarios and allow RPAG to weigh in on capital investment planning.	To the extent PSE can develop and share various capital cost forecasts for the IRP scenarios, we will do so.	RPAG
18	Model a mid-range electrification scenario to reflect PSE investing in electrification as a decarbonization resource.	PSE is developing consistent gas and electric scenarios for the 2027 ISP, through engagement with our advisory bodies.	RPAG
19	Model a “high” scenario that includes retiring the gas system by 2050 and impacts to customers.	Considering the findings in PSE’s Decarbonization Study (December 2022), RPAG members agreed that full retirement of the gas system by 2050 was unrealistic. PSE will model a more realistic “high” electrification scenario in the ISP, developed through engagement with our advisory bodies.	RPAG, Public
20	Include a scenario in which the gas distribution system is progressively decommissioned. Hydrogen blending should be utilized in this scenario.	PSE will consider this recommendation as we develop scenarios for the 2027 ISP, through engagement with our advisory bodies.	RPAG, Public

Generic resources and resource alternatives

No.	Feedback	PSE response	Entity
21	Consider thermal energy storage.	PSE will include this in the list of resources to consider for the 2027 ISP. Note, modeling of generic resources or lack thereof does not preclude those resources from being used in the future	Public

No.	Feedback	PSE response	Entity
		should they demonstrate the capacity to meet PSE's specific resource, equity, and customer requirements.	
22	Some members of the public indicated a preference to abandon any consideration of new nuclear energy as part of PSE's resource portfolio; some RPAG members expressed interest in further analysis and better understanding the potential of advance nuclear generation. (electric)	PSE is committed to an "all of the above" approach to meeting our clean energy needs. Given that nuclear energy is a CETA-eligible non-emitting electric generation resource, we are obligated to consider it as an option to help meet our clean energy obligations and goals.	Public, RPAG
23	Address in detail supply, cost, and constraints of alternative resources including hydrogen, nuclear, and geothermal.	This information will be included in the supporting materials with the 2027 ISP.	Public
24	Model established storage technologies rather than emerging technologies.	PSE established a technical readiness level (TRL) requirement for all modeled resources to ensure modeled technologies are capable of being in market reasonably soon if not already.	RPAG
25	Account for the full range of costs and benefits associated with different resources.	PSE will consider this feedback, especially pertaining to availability/cost of alternative fuels, the pace of electrification, and the social cost of greenhouse gases.	RPAG
26	Analyze cost and environmental impact of managing and disposing of nuclear waste.	PSE will include the best information available for the 2027 ISP.	RPAG
27	Analyze the feasibility, cost, and environmental impact of storage, transportation, and disposal of captured carbon dioxide for carbon capture and sequestration (CCS).	PSE does not expect to model CCS for the 2027 ISP but will research what information may be available. As noted previously, not modeling specific resources does not limit those resources from being proposed and acquired through our acquisition processes should they prove viable and cost effective.	RPAG
28	Analyze the availability, cost, and indirect environmental impacts of R99.	PSE will include the best information available for the 2027 ISP.	RPAG
29	Model advanced geothermal for the 2025 IRP.	PSE would like to model enhanced geothermal for the 2027 ISP and we will do our best to acquire the data necessary to include this technology as a generic resource in our models	RPAG
30	Provide a compilation of generic resource data for all resources.	PSE will provide the generic resource costs and operating assumptions developed for the 2025 IRP by Black & Veatch when available. However, we anticipate updating these assumptions for the 2027 ISP.	RPAG

No.	Feedback	PSE response	Entity
31	Ensure estimated operating life of offshore wind and all generic resources are realistic.	PSE will include the best information available for the 2027 ISP.	RPAG
32	Provide transparency about analysis and assumptions that go into alternative fuel price forecasts.	PSE will include the best information available for the 2027 ISP.	RPAG

Scenarios and sensitivities

No.	Feedback	PSE response	Entity
33	Run a sensitivity that explores how much demand response would be chosen as cost-effective if certain limits (e.g., ramp-rates) were relaxed.	PSE will include a sensitivity that tests how relaxed limits may enable more aggressive adoption of cost-effective measures.	RPAG
34	Explore a sensitivity in which an “opt out” version of time-of-use (TOU) program is implemented rather than an “opt in” version.	PSE successfully demonstrated one opt-out behavioral demand response program and is exploring additional opportunities. PSE will consider this feedback when developing ISP scenarios and sensitivities.	RPAG
35	Consider voided Climate Commitment Act and Clean Energy Transformation Act compliance cost, stranded assets risk, avoided emissions/health costs in cost-benefit analysis.	PSE is continuing to mature the non-pipes alternatives (NPA) /non-wires alternatives (NWA) evaluation criteria and appreciate your feedback on items to be considered.	RPAG
36	Model more than two types of demand response programs in the resource adequacy analysis.	Along with the 3 and 4-hour shed demand response resource, we plan to model managed electric vehicle charging. PSE will consider additional demand response options in the 2027 ISP.	RPAG
37	Provide additional details on the transmission sensitivities being modeled. Would transmission be prescriptive or would they respond to resources that the model selects?	PSE will be looking at a combination of two possible transmission capacity upgrades to address the cross-Cascades capacity need.	RPAG
38	Model aggressive electric vehicle adoption where vehicle-miles-traveled (VMT) assumptions decrease.	PSE will consider multiple electric vehicle adoption and use sensitivities.	RPAG
39	Explore bundling methodology that include a comparison of $/kWh vs. $/kW.	PSE and Cadmus are currently working to develop this suggested $/kW alternative bundling for the 2027 ISP.	RPAG

No.	Feedback	PSE response	Entity
40	Model a rate constrained scenario that looks at PSE's 2024 GRC revenue requirement to provide electrification incentives.	PSE plans to use the recently filed rate case as the starting point. We will have to determine whether to use electric revenue requirement, gas revenue requirement, or both to establish that electrification incentive budget.	RPAG
41	Include reasonable "worst case scenario" that assesses potential risks to company and customers.	PSE will consider this recommendation as we develop scenarios for the 2027 ISP, through engagement with our advisory bodies.	RPAG

Modeling

No.	Feedback	PSE response	Entity
42	Model weekly hydroelectric variability on a weekly rather than monthly basis.	PSE does not anticipate modeling weekly variability in our hydroelectric resources in the 2027 ISP because our data sources do not provide this level of detail at this time. We do, however, capture projected changes in hydro conditions resulting from climate change in our monthly hydroelectric variability that we input into our models.	Public
43	Model social cost of greenhouse gas (SCGHG) costs in dispatch.	PSE intends to continue to model SCGHG in two ways, as an externality cost and in dispatch.	Public
44	Include ELCC variations of hybrid systems rather than provide ELCCs just for each individual resource	PSE will model resources both independently and as hybrids for the 2027 ISP.	Public
45	Identify and plan a portfolio that meets regulatory requirements and demand at lowest reasonable cost.	The portfolio that meets all regulatory requirements at the lowest cost is identified in the resource planning process as the base case or the reference portfolio. This portfolio serves as the starting point for developing subsequent portfolio sensitivities. Developing the reference portfolio is therefore a critical component of the resource planning process. PSE presented this portfolio in past IRP cycles during public-facing presentations and in the draft and final document. We will continue to identify and present this portfolio in the 2027 ISP and future resource planning cycles.	RPAG

No.	Feedback	PSE response	Entity
46	Portfolios should achieve PSE's proportional share of direct GHG reductions needed to meet CCA.	PSE will consider this feedback, especially pertaining to availability/cost of alternative fuels, the pace of electrification, and the social cost of greenhouse gases (SCGHG).	RPAG
47	Allow RPAG to weigh in on base case assumptions	PSE will revisit base case assumptions during a meeting with the RPAG to support the 2027 ISP.	RPAG

Load forecast

No.	Feedback	PSE response	Entity
48	The load forecast should account for negative growth in customer count over the forecast period. (gas)	The Conservation Potential Assessment (CPA) will assess the potential of electrification measures. Impacts from electrification will be included in the final gas and electric demand forecasts.	RPAG
49	Load forecast should account for existing policies driving electrification of existing buildings and IRA incentives. (gas)	PSE will examine and include load impacts related to existing policies driving electrification in the 2027 ISP.	RPAG
50	Apply the load forecast consistently across all portfolios in the IRP. (gas)	PSE will consider this recommendation as we develop scenarios for the 2027 ISP, through engagement with our advisory bodies.	RPAG

Other

No.	Feedback	PSE response	Entity
51	Provide additional details and updates about time-of-use (TOU) / time varying rates (TVR), Virtual Power Plant (VPP), net metering, and vehicle-to-grid (V2G) technology and how they factor into resource planning.	PSE provided information and clarity on these programs in various webinars and feedback reports; we are continuing to explore these programs and will include additional engagement during development of the 2027 ISP.	Public
52	Include more details about future plans for transmission additions or upgrades.	PSE is engaged in WestTEC efforts and Western Resource Adequacy Program (WRAP) to develop actionable transmission plans and recognizes the importance of a region-wide approach to transmission. PSE plans to engage the RPAG regarding transmission to support development of the 2027 ISP.	Public

No.	Feedback	PSE response	Entity
53	Consider non-wire alternatives and non-pipe alternatives (NPAs) where possible.	PSE considers a variety of NWA and NPA to support safety, reliability, and resource planning efforts.	RPAG