

Dear IRP Team and Commission Staff,

During PSE's October 20 IRP webinar, PSE Senior Resource Planning Analyst Zhi Chen told stakeholders that the company has identified scenarios that could cause loss of load during summer peak hours. According to Chen, this is the first time this threat has appeared in PSE's Resource Adequacy models.

During the next five minutes of the meeting, Chen mentioned this deficiency three times. See the webinar video and transcript at <https://transcripts.gotomeeting.com/#/s/d7ecc1b7d9689a1fec71cbe7b97332c254c5fbf4024d765cd416acdca1234b9a> (starting at time stamp 01:05:00).

Stakeholders asked for further details about the deficiency, but PSE provided no additional information. We would like to know how large the deficiency is, when it first appears, and what kind of solutions might mitigate the problem. Is an increasing summer demand forecast driving the issue? What assumptions were included in the forecast? Would demand response help mitigate the problem? Energy storage? More rooftop solar?

We are concerned because power outages during the hottest days of the year present a significant risk to PSE's customers. Food can spoil in refrigerators, and customers with health conditions may be especially burdened.

Was PSE aware of this deficiency when it asked the UTC to delay its RFP for demand response resources? During that hearing, PSE told the Commission that the company sees no demand increases for the next five years. Also, PSE has never issued an RFP for *summer* demand response.

We are concerned about what might happen if emergencies arise after the IRP is published. If hasty acquisitions or curtailments are required, these may not accord with best planning practices.

We ask PSE to provide this information while stakeholders can still participate and comment:

1. Provide the summer peak forecast used to produce this conclusion.
2. Show when the deficiency first occurs.
3. Show the magnitude of the deficiency.
4. Describe any sensitivities that will be studied to address the deficiency.
5. Inform stakeholders which resources will be considered to mitigate the problem.

IRP stakeholders help ensure that our utility's long-term energy plan serves the interests of ratepayers. To fulfill this mission, stakeholders need full disclosure of any conditions that may impact the reliability, cost, and environmental impact of our energy supply.

Sincerely,

Don Marsh, CENSE  
James Adcock, Citizen at large  
David Perk, 350 Seattle  
Norm Hansen, Bridle Trails  
Fran Korten, Climate Action Bainbridge  
Kevin Jones, Vashon Climate Action Group

Doug Howell, Sierra Club  
Court Olson, Optimum Building Consultants  
Warren Halverson, CENSE  
Jane Lindley, Act 4 Climate  
Rob Briggs, Vashon Climate Action Group  
Elyette Weinstein, Ratepayer