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November 1, 2019

SENT VIA WEB PORTAL AND EMAIL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

RE: Commission Staff's Petition for an Order Granting Exemption from the Requirements of WAC 480-100-238(4) and (5)
Dockets UE-180607 and UG-180608 (Puget Sound Energy)
Docket UE-180738 (Avista Corporation)
Docket UE-180259 (Pacific Power & Light Company)

Dear Mr. Johnson:

Public Counsel files these comments with the Utilities and Transportation Commission ("Commission") in response to Commission Staff's ("Staff") Petition for an Order Granting Exemption from the Requirements of WAC 480-100-238(4) and (5) ("Petition"). Public Counsel supports the Petition, but requests the Commission consider providing guidance to the utilities regarding the proposed integrated resource plan (IRP) updates. Additionally, Public Counsel provides comments regarding Staff's proposal to forego the public hearing process.

I. The Commission should instruct the utilities to include certain information in their IRP updates.

Staff requests that the Commission grant an exemption from the requirements of WAC 480-100-238(4), which requires electric utilities to file IRPs within two years of the date on which the previous plan was filed. Staff requests that the 2019 IRPs be considered updates under RCW 19.280.030(1). Generally, Public Counsel supports Staff's Petition to allow efficient allocation of resources and development of important policies as required by the Clean Energy Transformation Act (CETA). The utilities' updates should be as useful as possible, rather than mere placeholders until the next full IRPs are filed.

To: Mark L. Johnson
Re: Dockets UE-180607 and UG-180608; UE-180738; UE-180259
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November 1, 2019
Page 2 of 3

Public Counsel believes Commission guidance would be useful regarding the information that should be presented in the IRP updates. In particular, the Commission should require the utilities to provide the results of any modeling they did during the 2019 IRP process, the revenue requirement of any runs conducted, and identification of any preferred portfolios resulting from the utility's analysis. Public Counsel appreciates that the utilities performed a significant amount of modeling and considered a wide variety of scenarios and factors in the current IRP cycle. This information, along with revenue requirement data and understanding the resulting preferred portfolio(s), will be useful because it will help guide, to some extent, the utilities' decision-making in the near term. Additionally, the information will be useful as the Commission and stakeholders work through the myriad of rulemakings necessary to implement recent energy legislation.

The Commission should also require the utilities to show how they each addressed requirements contained in CETA in their IRP modeling. While CETA was passed well into the period during which the utilities were developing their IRP analysis for the 2019 filings, each of the utilities were responding to anticipated legislative requirements. The utilities approached their modeling to anticipate requirements and modified their approach from prior IRP cycles. Reviewing how each utility approached compliance with CETA requirements will be useful as the Commission and stakeholders move forward with the IRP Rulemaking (Docket U-190689) and other related proceedings. The inputs and results from the Company's models will be informative, given that they took differing approaches to address the planning horizon while anticipating new energy policies. Examining each of the Company's approaches could provide useful data and lessons to guide decision-making in the near future.

II. Public participation should not be unnecessarily curtailed, but a public hearing may not be necessary.

Staff requests that the Commission grant an exemption from the requirements in WAC 480-100-238(5), which require a public hearing on electric IRPs. Public participation in Commission matters, including IRPs, is important because the Commission should be aware of how the public views and understands the issues before it. However, if the Commission grants the Petition and allows the 2019 filings to be accepted as updates, rather than full-fledged plans, a public hearing is not necessary. A public hearing is required for plans, but not updates, under the rule. Even so, public participation should not be wholly curtailed. Members of the public may review the 2019 filings made by each of the electric utilities, and they may file written comments regarding these filings. Public Counsel believes that the Commission should include a statement in its order that the public may file written comments along with information regarding how individuals may communicate with the Commission.

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November 1, 2019
Page 3 of 3

Public Counsel appreciates the opportunity to provide these comments. We will be present at the November 7 Open Meeting to participate in the discussion regarding Staff's Petition. Questions about these comments can be directed to Carla Colamonici (Puget Sound Energy) at Carla.Colamonici@atg.wa.gov or (206) 389-3040, Corey Dahl (Avista Corporation) at Corey.Dahl@atg.wa.gov or (206) 464-6380, or Sarah Laycock (Pacific Power & Light Company) at Sarah.Laycock@atg.wa.gov or (206) 389-3879. If you have any other questions, please contact Lisa Gafken at Lisa.Gafken@atg.wa.gov or (206) 464-6595.

Sincerely,

/s/ Lisa W. Gafken
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LWG/KMB
Enclosure
cc: Service List (via E-mail)