

Feedback Report

RPAG Meeting

Meeting details

- Tuesday, February 13, 2024, 12:00 p.m. - 3:00 p.m.
- Virtual webinar hosted by PSE and facilitated by Triangle Associates
- Links to:
 - [Presentation](#)
 - [Meeting recording](#)

Feedback report

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	2/13/2024	Don Marsh	Public comment	Washington Clean Energy Coalition appreciates the inclusion of the IAP2 slides at the beginning of each section of today’s presentation. We hope there will be more opportunities for the public to participate at the higher IAP2 levels in the future. However, there is still a significant structural issue with public participation. Let’s consider the description of the “involved” level. It says to work directly with the public throughout the process to ensure that public concerns and aspirations are	WAC 480-100-630 and WAC 480-100-625 support the implementation of advisory groups to support the development of integrated resource plans (IRP) in addition to public participation outlined in WAC 480-90-238 and WAC 480-100-625 . We continue to welcome members of the public to participate in RPAG meetings by

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				<p>consistently understood and considered in this meeting. PSE chooses to believe that a dozen people picked by PSE fulfill the definition of public participation. Members of the public like myself, Jim Adcock, Virginia Lohr, and Thomas Kramer have persisted in our engagement in these meetings even though we continue to be excluded from asking questions or having useful interactions with PSE representatives and RPAG members. This is not what IAP2 envisions nor is the intent of the Washington Administrative Code which states explicitly that public participation is essential in the development of an Integrated Resource Plan. We continue to ask that this exclusion be lifted, otherwise we ask that PSE add an asterisk to every future IAP2 slide acknowledging that PSE is not actually committed to IAP2 standards of public participation. I am not able to provide all our questions and suggestions that arose during this three-hour meeting in a two-minute comment. I will try to submit them in the feedback form but I know that this is a further impediment to public participation and we strongly object to the obstacle that are being placed in our way concerning very important issues that impact our communities, our environment, and quality of life for our descendants. PSE can do better.</p>	<p>providing public comments and submitting questions or comments one week before through one week after each RPAG meeting via irp@pse.com or the online feedback form.</p> <p>Members of the public may also participate in our virtual public webinars. These webinars include the opportunity for Q&A as well as public comment. Interested parties are also encouraged to submit written feedback or questions to PSE via irp@pse.com or the online feedback form.</p> <p>PSE catalogues responses to each piece of public and RPAG feedback in our Feedback Reports and shares those with RPAG members and the PSE resource planning team.</p>
2	2/13/2024	James Adcock	Public comment	<p>Jim Adcock, electrical engineer. It is great the Puget is working on equity aspects but Puget must also actually work on reducing the use of emitting generation of electricity in order to meet the requirements of CETA to be 80% actually clean by 2030. Currently Puget continues to rely heavily on gas generation, generating nearly 1,000 megawatts of gas generation nearly 24/7/365. Puget talks about safety quote unquote, it is not safe, quote unquote, to continue to rely on emitting generation. With the Bressler Mortality Cost of Carbon paper estimating 1,400 deaths per year of Puget operation at current levels of carbon emissions, foot dragging costs, lives you touched on gas storage. In terms of gas storage I expressed disappointment that</p>	<p>PSE's commitment to meeting our Clean Energy Transformation Act (CETA) obligations of providing 80% clean energy by 2030 has not changed. Our 2023 Biennial Clean Energy Implementation Plan (CEIP) Update outlines our progress towards our clean energy targets.</p> <p>During our recent historic cold weather event the Jackson Prairie plant still delivered a significant amount of energy between the initial outage and when it came online throughout the day, ranging approximately between 50% and 70% of full capacity. There</p>

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				<p>Puget didn't learn from the Texas experience a few years ago and now Puget's Jackson Prairie gas storage facility didn't actually successfully run during recent coldest winter days. This was not a business as usual situation, rather Puget took the extraordinary step of asking rate payers to minimize their use of both gas and electric for several days and in fact never actually sent us an all clear back to normal email. So if Puget is going to rely on gas for both direct delivery to customers and to generate electricity then the gas reliability actually needs to be there and now. Repeatedly the gas reliability has not been there. Thank you.</p>	<p>were no outages in PSE's service territory related to the Jackson Prairie outage.</p> <p>During the cold weather event PSE and other utilities asked customers to conserve natural gas and electricity use through the peak hours to reduce strain on the grid.</p> <p>When it gets cold like that and the days are short, customers use more electricity and natural gas to stay warm. That's why conserving energy can be so important. Short term, conserving energy is one of the simplest, cheapest ways to immediately reduce strain on the system. Long term, conservation helps offset the amount of generation resources we need to have on hand to meet customer demand during peak use.</p>
3	2/13/2024	Virginia Lohr	Public comment	<p>I'm Virginia Lohr, a PSE custom on Vashon. PSE has responsibilities in different areas. They have responsibilities to generate profits for shareholders and to provide safe and reliable service to customers. But also as members of a society they have a moral obligation to consider the impacts of their actions on humanity and the future which today includes special attention to their impacts on climate change, which is destroying prospects for living creatures around the world. PSE's efforts are easy to check in regards to profit and reliability but cannot be so readily checked regarding their duty to the future. I do see some signs that could indicate consideration for this moral responsibility such as PSE's efforts to get House Bill 1589 which would change the gas side of their business past this session and their desire to extend the net metering rate for solar through 2025. Such signs of responsible behavior regarding PSE's moral obligation to humanity can be hard to find and actions that appear mainly to work in the interest of profits and against the</p>	<p>As stated in part one of question #2, above, PSE's commitment to meeting our Clean Energy Transformation Act (CETA) obligations of providing 80% clean energy by 2030 has not changed.</p> <p>PSE supports Community Solar, which is a large and growing program. In 2022 PSE supported the passage of HB 1814 which created the WA State Community Solar Expansion Program and provides \$100M of simple, accessible funding for up to 100% of a community solar project's development costs that are designated to benefit low-income subscribers. You can read more about our Community Solar program and our clean energy efforts in the 2023 Biennial Clean Energy Implementation Plan (CEIP) Update.</p>

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				moral obligation seem too easy to find, such as PSE building the Tacoma LNG facility without first obtaining building permits, and PSE opposing Community Solar which is one of the essential components for distributing reliable power throughout their service territory to reduce the impacts of climate change. We must do things differently than we have for decades and we includes PSE. Please remember your moral obligation in all actions you individually promote at PSE. It must not just be about profits and power supply.	
4	2/13/2024	Pete Stoppani	Public comment	I'm Pete Stoppani. I'm a customer and I'm also involved with the northwest clean energy group. I wanted to say that this meeting was incredibly refreshing for me to see such great interaction with the folks that are outside of PSE. The reason I mentioned that is because just like Don had mentioned that a lot of times it's really hard to have a two-way conversation with PSE, and it's nice to see that it's possible. It would be nice if there are ways for some of us that are concerned about various issues to actually have more opportunities like this where we can also chat with you. I also had feedback on the slide where you had the different high/low scenarios and especially on the discussion about whether it's even useful to have the full retirement scenario. I agree with Lauren and others that's probably not very useful or very realistic but I think the scenario that I would like to see is (if it wasn't clear if the other two really covered this given that Bill 1589 is up) is where there are no new gas hookups for residential and possibly even commercial and then to figure out what that impact is on you and on the customers. You're going to start having more residential pipes that aren't feasibly anymore, which means you have to retire them, and I'd like to see what kind of modeling you can do around figuring out what that really does to both PSE and to the customers as far as rates. Thank you.	<p>Thank you for your comment. We encourage members of the public to participate in our virtual public webinars in addition to RPAG meetings. These webinars include the opportunity for members of the public to ask PSE questions as well as participate in a public comment opportunity.</p> <p>PSE's base load forecast reflects the impact of new codes and standards, along with changes to PSE's gas line extension policy that result in zero residential customer growth starting in 2024 and very low commercial growth. That is, we are planning for the scenario you describe as the foundation of the base expectation. Coupled with conservation efforts and the potential for some customers to electrify gas appliances as they burn-out, we are forecasting negative load growth. We agree that it will be helpful to forecast bill impacts for the resource plan and some key scenarios, such as the electrification scenarios.</p>
5	2/13/2024	James Adcock	Feedback form	It seems inappropriate, relative to PSE's claim that the public can view these meetings, that there is a text-	Thank you for your comment.

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				based "side chat" discussion going on between the PSE-invited participants, that the public is not allowed to view	
6	2/18/2024	Thomas Kraemer	Feedback form	Thank you for sharing the status of planning for electrification away from natural gas. It is clear you are working seriously on this. During the meeting, there were a number of references to customer demand for gas and customer resistance to electrification. Under our state's laws, however, these can be considered only within the constraint that all fossil emissions, including all use of natural gas, must be eliminated. The law recognizes it's not realistic to just turn off the gas, so the elimination is phased over time, but planned elimination is required. Just to emphasize the urgency here, I'll point out that our state laws are based on the atmospheric heating that is already killing people. PSE's planning should take fossil fuel elimination as an overriding constraint, and plan within that hard constraint for the most cost-effective path to it, rather than considering it as just one factor in optimizing costs and benefits. An increasing number of studies have shown that utilities should be able to electrify heating demand at lower cost than continuing to use fossil fuels, when considered in a long-term present value, system-wide basis.	Thank you for your comment. The Climate Commitment Act (CCA) is not designed as a command and control regulation that requires gas utilities to stop selling natural gas to end-use customers to hit a specified target. Instead, the CCA allows covered entities to trade allowances to comply with CCA allowance (i.e., authorized emissions) obligations. We recognize that allowable emissions across the entire market will decline over time, but as Washington moves towards joining the California and Quebec cap and trade markets, it will significantly increase the size of the allowance market. Therefore, it is appropriate to model the price related impacts of CCA allowance obligations of PSE's gas utility service to customers in the IRP, not a hard emissions cap.
7	2/19/2024	Sommer Moser (RPAG member) on behalf of Alliance of Western Energy Consumers (AWEC)	Feedback form	AWEC appreciates the opportunity to comment on PSE's February 13, 2024 RPAG Meeting. Regarding the discussion on decarbonization scenarios, AWEC finds that including a bookend "high" scenario that includes retiring the gas system by 2050, in addition to other "high" scenarios that may be requested by other participants, would provide valuable information. In modeling this scenario, AWEC finds it imperative to model the complete costs of retiring the gas system, as opposed to a scenario that simply assumes no more customers on the gas system. A 100% conversion scenario that doesn't consider retirement costs does not provide a comprehensive picture of the impacts to this	Thank you for your feedback and for the additional details regarding including costs associated with the retirement of the gas system. PSE plans to include the associated gas and electric system costs in the analysis for all electrification scenarios. For the rate constrained electrification scenario, 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

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				<p>scenario. The retirement scenario should also include impacts to PSE’s electric system for customers in PSE’s electric service territory that would fuel switch. Additionally, AWEC finds it valuable to include a “high” scenario where PSE continues to maintain the system for natural gas transport customers and for residential and commercial customers’ non-space heating needs. On the rate constrained gas conversion scenario, AWEC finds that the “simple” approach that looks at PSE’s 2024 general rate case revenue requirement and applies a certain percentage rate increase to provide electrification incentives would be an appropriate approach for modeling the rate constrained scenario. PSE should also provide information about the level of electrification that could be achieved by the creating a ratepayer fund.</p>	<p>budget. This starting point would not reflect the additional upward pressure on gas and electric rates from the resulting electrification, but those can be estimated on the back-end of the analysis. We will have to decide how much of that electrification incentive budget would be funded from electric versus gas utility operations, to perform such billing forecasts. However, the cost of the incentives from external funding sources, such as a grant from the Dept of Ecology can be treated outside the impact that electrification would have on either gas or electric.</p>
8	2/20/2024	Jim Dennison (RPAG member) on behalf of Sierra Club	irp@pse.com	<p>1. Equity in Delivery System Plannings</p> <ul style="list-style-type: none"> • First, we commend PSE for its efforts to increasingly incorporate equity into its delivery system planning. • We recommend that PSE consider non-wire alternatives and non-pipe alternatives (NPAs) for as broad of a range of projects as possible, at a level of detail commensurate with factors like the project type, project size, planning stage. It is especially important to fully consider NPAs at every opportunity given their non-energy benefits, alignment with Washington energy policy, and potential to avoid stranded gas infrastructure. We encourage PSE to explore options for funneling potential NPA opportunities through a series of filters or developing a streamlined evaluation process for smaller projects, rather than applying firm criteria that exclude NPAs for certain project types or projects that fall below a cost threshold. This approach, which is being explored in other 	<p>1. Thank you for your feedback. PSE is considering a variety of non-wire alternatives (NWA) and non-pipe alternatives (NPA). Please reference our Kitsap RFP for an example of this work PSE is doing.</p> <p>PSE is continuing to mature the NPA/NWA evaluation criteria and appreciate your feedback on items to be considered.</p> <p>In 2022 PSE made a video series about Delivery System Planning for the Equity Advisory Group (EAG). You can watch those on the EAG YouTube page here. These videos contain additional information on benefit-cost analysis in Delivery System Planning.</p> <p>2. Thank you for your comments. We are continuing to grow and evolve how we utilize our hosting capacity map tool.</p>

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				<p>jurisdictions,¹ would maintain efficiency while ensuring that PSE does not miss good candidates for NPAs.</p> <ul style="list-style-type: none"> • We request that PSE share additional information about its benefit-cost and equity analyses for potential projects, including the factors used to monetize the benefit-cost factors listed on slide 19 and a description of the equity criteria that must be satisfied for a project to proceed. • We recommend that PSE consider the following factors and non-energy benefits in its cost-benefit analyses of non-pipe and non-wire alternatives: <ul style="list-style-type: none"> ○ Avoided CCA/CETA compliance costs associated with reduced gas/electric demand. ○ A monetary value reflecting the stranded asset risk of gas infrastructure projects. This could include any negative salvage value of the gas infrastructure project,² a cost based on the undepreciated balance of the infrastructure costs expected in 2050 (when most gas infrastructure must be retired in order to meet Washington’s decarbonization targets, and/or other measures of stranded asset risk. ○ Avoided emissions/health costs associated with reduced combustion to meet gas/electric demand. Some of these 	<p>3. Thank you for your feedback</p>

¹ See Colorado PUC, Proceeding 23M-0234G, Conservation Advocates’ Reply Comments at 7-8, 31 (Oct. 6, 2023); Colorado PUC, Proceeding 23M-0234G, Strategen, *Non-Pipeline Alternatives: A Regulatory Framework and a Case Study of Colorado* at 21 (Oct. 2023) (recommending “full-scale” NPA analysis for large infrastructure projects and a “streamlined” NPA assessment for small projects), <https://drive.google.com/file/d/1P5BRdeRHK4gKsFfpdHZmaCUQbVyaPRq3/view>; Strategen, Pipeline Alternatives to Natural Gas Utility Infrastructure: An Examination of Existing Regulatory Approaches at 10-13 (Aug. 2023) (describing other states’ approaches to identifying NPA candidates), <https://drive.google.com/file/d/1IDXd4XePe4auVSVRnat5jRf47BMQziPd/view>.

² See Colorado PUC, Proceeding 23M-0234G, Conservation Advocates’ Final Comments at 8-9 (Nov. 3, 2023).

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				<p>avoided costs can be estimated using tools such as EPA's COBRA tool.³</p> <ul style="list-style-type: none"> ○ Additional benefits, such as the avoided social costs of GHG emissions associated with the infrastructure project, avoided safety risks associated such as pipeline explosion risks, and others. ● In response to the feedback questions on slide 23, we recommend that PSE explore opportunities to evaluate both individual projects and portfolios of resources (such as a portfolio of NPAs, a portfolio of infrastructure maintenance/replacement projects, or a transportation electrification portfolio) from an equity perspective. We also recommend that as PSE develops experience considering equity issues in resource planning, it should consider opportunities to actively pursue and optimize for equity outcomes, which could move beyond using them as a “yes or no” screen to already-selected projects. <p>2. Hosting Capacity Map</p> <ul style="list-style-type: none"> ● We support PSE’s use of advanced geospatial analysis to identify optimal locations for DERs, and its use of equity considerations in this optimization. We recommend that PSE apply similar techniques to identify opportunities for geo-targeted electrification incentives, zonal electrification projects, and NPAs. Pacific Gas and Electric is developing a mapping tool for this purpose,⁴ and 	

³ See California PUC, Proceeding A21-12-009, Direct Testimony of Cara Bottorff (Oct. 18, 2022) (describing such an analysis for a building electrification proposal), <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2112009/5591/497713105.pdf>.

⁴ See, e.g., California Public Utilities Commission, R.20-01-007: Long-term Gas System Planning, [PG&E Opening Comments on ALJ Ruling Directing Parties to File Comments on Staff Gas Infrastructure Decommissioning Proposal](#) (Feb. 24, 2023), at 5, 9; PG&E, California Energy Commission and EPRI Building Electrification Summit

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				<p>this type of mapping analysis is being explored in other jurisdictions.⁵</p> <p>Decarbonization Scenarios in the IRP</p> <ul style="list-style-type: none"> • We recommend that PSE model electrification scenarios that represent a range of realistic potential futures where PSE invests in electrification as a decarbonization resource. This will help PSE, stakeholders, and the Commission evaluate whether the model selects a similar amount of electrification as is expected under realistic scenarios, and what inputs, methods, or assumptions may explain any significant differences between the model-selected and “forced-in” electrification. While we appreciate PSE’s effort to compile stakeholder feedback into the three proposed scenarios on Slide 37, we are concerned that these may not reflect the most realistic range of electrification-focused scenarios. <ul style="list-style-type: none"> ○ We recommend that PSE model at least one scenario that incorporates features of the Path to Pollution-Free Buildings Portfolio that experts recently proposed for Xcel Energy Colorado. This portfolio includes a percentage of electric new appliance sales that ramps up over time (here, we recommend ramping sales up to 100% electric by 2030 for most equipment types), installation of heat pumps in place of ACs (rather than only furnaces), and step-downs in incentive levels over time as market adoption accelerates, among other 	

Day 2, “PG&E Neighborhood Scale Electrification Efforts – Current and Future” at 3:07:00 (Oct. 11, 2023); E3, California Energy Commission and EPRI Building Electrification Summit - Day 2, “Strategic Pathways and Analytics for Tactical Decommissioning of Portions of Natural Gas Infrastructure in Northern California” (Oct. 11, 2023), at 3:13:00 - 3:20:00, [Zoom Recording Link](#).

⁵ Colorado PUC, Proceeding 23M-0234G, Final Comments of the Colorado Energy Office and Conservation Advocates on Gas Utility System Mapping (Nov. 3, 2023).

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				<p>elements designed to maximize benefits while minimizing program costs. PSE could model this as an additional electrification scenario, which would likely fall between the rate constrained and mid-electrification scenarios it has proposed.</p> <ul style="list-style-type: none"> ○ PSE should consider limiting the number of scenarios where the model is both required to select a certain amount of electrification and prohibited from selecting alternative fuels and gas appliance incentives. Applying all of these constraints simultaneously may mask the effect of any one scenario feature. For example, once the model selects a certain amount of electrification, it may encounter market learning effects that cause it to select additional electrification without any further constraints. This effect may be difficult to observe in a scenario that also prohibits selection of other resources. Accordingly, we recommend that PSE consider allowing alternative fuels and gas appliance measures in the mid electrification scenario. ○ We generally recommend avoiding scenarios where buildings are required to fully electrify before most equipment is at or near end of life (as suggested by the left box of the high electrification scenario). If PSE concludes that electrification before equipment burnout is necessary to bring emissions down to the consigned allowance line, it should share the analysis supporting that conclusion with stakeholders. ○ We do not recommend requiring the gas system to fully retire by 2050 in the high 	

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				<p>electrification scenario. A more realistic scenario would allow a small portion of the gas system to remain online, for example to serve large industrial customers.</p> <ul style="list-style-type: none"> ○ We are interested in other stakeholders' feedback on the best set of electrification scenarios to model. We are generally more interested in consensus scenarios that are realistic and coherent than in any specific scenario feature, so we are open to modifying some of the recommendations above to align with other stakeholders. • While we appreciate PSE's dedicated analysis of electrification scenarios, we are generally more interested in understanding how much electrification the model will naturally select as a decarbonization/CCA compliance resource under realistic assumptions about the landscape of decarbonization resources. For example, we are more interested in a scenario where the costs of allowances and alternative fuel costs are high and their availability is low (and non-energy impacts are incorporated appropriately) than one where the model is prohibited from selecting them. We look forward to discussing these assumptions further in future RPAG meetings. • The RPAG meeting touched on the allocation of electrification costs between gas electric customers. We recommend that PSE assume gas customers will be responsible for costs of electrification as a CCA compliance resource, although we agree with NVEC that PSE should not dwell on cost allocation here because is not directly addressed by resource planning. 	
9	2/26/2024	Joel Nightingale (RPAG)	irp@pse.com	General	1.Thank you for your feedback. PSE is assuming in 2024 and forward there will be

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		member) on behalf of Washington Utilities and Transportation Commission		<p>• Staff appreciates the use of the IAP2 spectrum to show for each section what level of engagement PSE expects on each topic.</p> <p>Equity in Delivery System Planning</p> <p>1. Staff notes that based on previous RPAG meetings, the question of “load growth” on the gas system is an open one. Has PSE considered developing a planning trigger (slide 16) in the Delivery System Planning process for load reductions? Staff continues to stress the risks to customers if PSE does not evaluate this possibility that seems increasingly likely. This applies to both the bulk resource and delivery side of PSE’s planning processes. We appreciate the discussion during this RPAG meeting, and the comments from other members around the risk of stranded assets if PSE’s delivery system planning process does not consider this possibility.</p> <p>Hosting Capacity Map Overview</p> <p>2. Staff appreciates the primer on PSE’s hosting capacity map. As discussed during this meeting, Staff continues to see limitations on a map that we understand to be optimized primarily for distributed solar, particularly with the potential value that storage (among other DERs) can bring to capacity constrained portions of the grid.</p> <p>3. Slide 28 describes the questions PSE uses to optimize DER siting. Staff encourages PSE to focus on the distribution of benefits and burdens (per CETA) in its planning processes when it comes to distributional equity. As described in Staff’s comments on PSE’s 2023 Biennial CEIP Update (and during this RPAG meeting), we encourage PSE to check its assumption that siting a</p>	<p>zero load growth in the overall system. While at a system level that is true, there continue to be pockets of growth we expect to continue past 2024 and taper off. PSE is also evaluating areas where load growth may decline and considering that in its investment strategy.</p> <p>2. Thank you for your comments. We are continuing to grow and evolve how we utilize our hosting capacity map tool.</p> <p>3. Thank you for your comment.</p> <p>4. PSE has contracted with Cadmus to develop an analytical tool that enables the modeling of impacts of various economic parameters on customer choices around electrification, including rate and bill impacts, which in turn will impact customer counts and loads. The model will incorporate customer adoption assumptions such as the treatment of incentives, treatment of fuel price forecasts (including electricity rates), s-curve parameters, and including relationship between project payback and customer willingness to adopt. This model is still currently under development.</p> <p>5. Thank you for your comment.</p> <p>6. In 2022 PSE made a video series about Delivery System Planning for the Equity Advisory Group (EAG). You can watch those on the EAG YouTube page here. These videos contain additional information on</p>

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				<p>resource in a named community will necessarily deliver net benefits to that community. Staff appreciates the discussion during this RPAG meeting and the resources that other RPAG members shared. Staff sees this as an important issue in the near term as PSE continues its procurement efforts for distributed solar and storage.</p> <p>Decarbonization Scenarios</p> <p>4. Staff appreciates PSE proposing inclusion of a bill impact analysis in the IRP process. Staff understands that these economic impacts on customers are likely to have an impact on their choices around electrification, which would in turn impact inputs to the IRP modeling (e.g., use per customer, customer counts). How does PSE plan to account for this dynamic? Has PSE conducted any analysis on how responsive the rate of customer end use electrification is to economic signals (e.g., rate increases, tax incentives)?</p> <p>5. Staff appreciates the conversation that slide 37 spurred around the different approaches PSE is considering to modeling electrification scenarios. Staff also appreciates PSE looking at different levels/paces of electrification. We note that there were some outstanding questions about what “retire gas system by 2050” means, and how the “Rate Constrained” scenario would work. These are complicated questions that involve concepts that are not part of the traditional IRP process, and Staff believes that further discussion may be warranted to ensure the RPAG and the public understand how these issues fit into the 2025 IRP.</p> <p>6. In response to PSE’s question on slide 23, “Do you recommend other considerations as we evolve our delivery system planning?”:</p>	<p>benefit-cost analysis in Delivery System Planning.</p> <p>Additional information related to DER scoring can be found in the 2023 DSS RFP, with specific information in Exhibit A.</p>

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				<ul style="list-style-type: none"> • Staff would like to better understand how PSE quantifies the benefits from its delivery system work, and for resources located on the distribution system (DERs). For example, how do PSE's delivery system efforts enable an equitable distribution of benefits? How does PSE track where various benefits accumulate (to participants, to local residents, to ratepayers)? Staff would also like to know what benefits PSE has quantified (and currently impact its planning decisions) and what gaps there may be in the quantification of benefits 	