

# Resource Planning Advisory Group feedback report

## Meeting details

- Tuesday, October 28, 2025, 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 records participant questions and PSE responses from the public comment opportunity and comments submitted via online [feedback form](#) or email to [isp@pse.com](mailto:isp@pse.com). Meeting materials are available on the [clean energy planning website](#).

PSE endeavors to provide clarity in responses but subsequent follow-up may be required at times. Please direct any follow-up clarifications to [isp@pse.com](mailto:isp@pse.com).

## RPAG member feedback

### 1. Wesley Franks on behalf of the Washington Utilities and Transportation Commission, November 4, 2025 via [isp@pse.com](mailto:isp@pse.com)

#### General Comments

1. Staff notes that the only question presented to the RPAG are on slide 16 and 24, and they were both simply “questions?” **Staff recommends that PSE come prepared to future RPAGs with *specific* and *direct* questions designed to solicit input, feedback, and direction from RPAG members.** For the next RPAG, Staff recommends PSE use specific questions designed to

solicit targeted input from the RPAG members on how to account for equity impacts in its ISP, including how PSE is or is not iterating across models.

*PSE appreciates the feedback. The most recent RPAG was intended to provide a starting point for further discussions related to equity. As explained on timeline slide 11, the presentation was the culmination of several conversations and input from RPAG and EAG members over the past couple of years, beginning as early as the development of the 2023 Electric Progress Report and portfolio benefits analysis. PSE solicited feedback at all of those prior meetings, seeking specific input (or alternatives) on a range of topics including but not limited to the portfolio benefits analysis, definition of “deepest need,” and incorporating equity into delivery system planning. The Oct. 28, 2025 meeting was primarily designed to provide an update and reflect on previous conversations while also serving as a “did we miss” anything opportunity as we finalize the modeling approach and assumptions.*

*As noted in the meeting on slide 12, there will be future opportunities to consider equity impacts that have the potential to be more impactful, such as consideration of the decision framework and ultimately any specific actions in the final preferred portfolio that advance equitable outcomes. PSE looks forward to delving into specific questions with RPAG members at future meetings.*

2. When RPAG members brought up questions about specific equity metrics and how they will be quantified during the October 28 meeting, PSE facilitators redirected and said that the conversation should stay high-level. Echoing what some RPAG members raised, **Staff believes that it is important to discuss and clarify specific goals that the ISP equity analysis intends to achieve so that analysis can inform actionable goals.** Discussing specific intended equity outcomes can also allow PSE and RPAG members to collaboratively engage in backwards planning, where end goals are defined first, followed by work to determine the necessary actions and analysis required to achieve those outcomes.

*PSE appreciates the input. Achieving goals related to equity is a complex issue, especially in the context of a 20+ forward-looking plan designed to serve customer needs at the lowest reasonable cost. As noted in our response to question 1, PSE looks forward to hosting further discussions regarding equity as the ISP development progresses.*

3. If the request to stay high level is reflective of PSE’s internal deliberations about how to proceed with aspects of equity programs, that may be an area where the RPAG could provide valuable input.

*Please see our response to question 1. As noted, this meeting was backward looking at the progress made to date which, in many cases, was quite detailed. The “high level” nature of this discussion was a product of the content and the intent to focus on outcomes of previous engagement efforts to inform the modeling work. We recognize the interest and desire to discuss more tangible and actionable topics – those will come later in the process.*

4. Staff encourages PSE to provide a conceptual structure for breaking down equity analysis to support productive conversations amongst RPAG members. Consider focusing conversation on discreet elements of equity analysis, which could include, for example, 1) intended outcomes of the analysis 2) data inputs 3) methods for analyzing the data. While these topics may need to be addressed iteratively, **each topic would benefit from focused conversation that PSE prompts with thoughtful discussion questions to RPAG members.**

*Slide 11 describes how we have implemented this approach in the past – meeting with advisory groups to discuss and solicit feedback on specific topics. PSE intends to continue this approach in 2026 while recognizing time with our advisory groups is a limiting factor and we will not be able to discuss every topic that might be of interest to the RPAG and/or EAG. We also want to be judicious about our use of inform-only topics, so we can use our advisory group time effectively to have thoughtful discussions and receive input. In our view, we needed to describe the equity foundation built through a series of conversations with UTC staff and advisory group members to lay the foundation for more impactful conversations to come.*

5. Some of PSE's other advisory groups have "hot sheets" and other documentation to help prepare them for their meetings. **Staff recommends that the RPAG incorporate similar methods of disseminating this type of brief preparatory documents to the RPAG to better support public participation.** For example, as outlined further below, a hot sheet related to equity could prep the RPAG on Commission rules requiring equity be considered via complimentary analysis in the decision framework (See WAC 480-96-30(8)(iii)). Likewise, some of the information the RPAG was informed of during the October meeting could have been summarized prior to the meeting. Staff appreciates that PSE does not want to overload RPAG members with "homework", but the ability to prepare appropriately for a meeting will result in better input

*Thank you for the feedback. Each advisory group is different, and we will continue to work to meet the unique needs of RPAG members. PSE aims to strike a balance between providing summary information prior to a meeting in writing (such as the feedback assumptions memo) with providing background information in the meeting. We will continue to consider opportunities for presenting information in advance.*

6. **Staff recommends PSE articulate the regulatory context of equity analysis in the ISP and equity analysis approaches PSE has used in other contexts in more detail than what was provided on Slide 10.** For example, similarly to what was requested by EAG members in the last EAG meeting, PSE could share the specific ISP rules pertaining to equity, so that RPAG members have a clear understanding of the regulatory context PSE is working within. Similarly, RPAG members would benefit from background information on and explanation of the approaches that could be borrowed for the ISP analysis from previous PSE work, such as the concepts of non-energy impacts (NEIs), customer benefit indicators, and distributional equity analysis (DEA). Each concept and its

possible applications should be explained systematically. As discussed above, this background could be provided prior to the RPAG meeting to prepare members to come to the meeting and discuss.

*Thank you for the feedback. PSE will consider these recommendations as we approach equity topics in the future.*

7. Slide 6, on meeting purpose, indicates one of the action items for the meeting was to “reflect on EAG feedback”. Staff notes the difficulty reflecting on EAG feedback without knowing exactly what the EAG feedback was. While the inclusion of an EAG member has been a positive development for the RPAG, it would have been helpful to include some of the direct feedback from EAG members within this presentation as one EAG member does not speak for all. **Staff recommends PSE better connect and articulate what EAG feedback is, how PSE is incorporating that feedback in the development of the ISP, and ultimately how EAG feedback informs the ISP.** If requested, PSE should send a transcription of the EAG feedback to both EAG and RPAG members that request it.

*Thank you for your feedback.*

8. Customer preference survey – Staff has significant concerns about using the customer preference survey as a primary means of analyzing distributional equity. **Staff recommends PSE continue to inform the RPAG on the specific ways in which it intends to use the results of that survey moving forward.**

*Thank you for your feedback.*

#### Equity in Decision-Making

1. Slide 15 notes multiple stages of “demonstration” of equity considerations throughout the ISP development process. While PSE indicated during the RPAG that Slide 15 provides general detail on mapping and more conversations will occur over the course of the year, Staff is concerned that a participation strategy that focuses on describing current practices without explicitly engaging on whether new or revised practices are warranted may lead to a situation where interested parties are presented with outputs after the fact when it is too late to make meaningful improvements. How does PSE plan to solicit specific input on appropriate ways to consider distributional equity in its planning at its upcoming RPAG meetings?

*PSE plans to have additional conversations with the EAG and RPAG regarding the development of equity considerations in 2026 and will consider this issue as part of those conversations.*

2. Staff notes that WAC 480-96-050(8)(c)(iii) provides language directing each Large Combination Utility (LCU) to determine “through engagement and consultation with the commission, its advisory groups, and the public” how to account for, at minimum, rate impacts, bill impacts, economic development impacts, and equity impacts. In the Order adopting ISP rules (In re *Matter of Amending Rules in*

*WAC 480-96 Relating to Integrated System Planning*, Dockets U-240281, Order R-609, 25, ¶ 77 (Sept. 26, 2025)), the Commission affirmed its expectation that each LCU “consider industry practice and consult Commission Staff, advisory groups, and the public in determining the most appropriate method of accounting for these impacts.” Staff is concerned RPAG members may not be adequately prepared with relevant context, purpose, and general awareness of what goals PSE is attempting to address.

*PSE is planning engagement next year consistent with the direction provided in WAC 480-96-050 (8)(c)(iii) to seek input on how to account for these impacts. This meeting was intended as a precursor to those future conversations.*

- a. Staff recommends PSE include in future RPAG discussions how complimentary analysis will support the decision-making framework, and include specific questions consulting RPAG members on what actions PSE should take to better support the ISP. This may include an articulation of how distributional equity impacts may be weighed against other impacts in the context of decision-making, or how PSE will have a plan for iterating on its distributional equity in future planning.

*Thank you for your feedback.*

- b. What are PSE’s future plans for consulting with its advisory groups on how it is considering industry practice?

*PSE plans to consult with advisory group(s) in early to mid-2026 on how to consider the cost test components of the ISP rules.*

3. On slide 15, PSE indicates that “ability to impact equitable distribution of benefits increases” going forward towards quarter four of 2026. Staff is concerned that the closer PSE gets to the filing of its ISP, the harder it will become to effectuate change with the plan. Further, slide 15 indicates PSE will demonstrate equity in “outcomes and actions” in quarter four of 2026, presumably only a few months out from the filing of the ISP.

- a. Can PSE clarify how the ability to impact increases, including what consultation opportunities will become available to advisory group members as PSE moves along with its planning efforts?

*The intent of this arrow was to illustrate the degree to which we can demonstrate equity, given a specific phase of the integrated system planning process. PSE recognizes there are limitations of considering equity at the modeling and analysis stage of the integrated system planning process where it is difficult to identify a specific customer group and assess the geographic, population or demographic impacts when modeling generic resources. A better understanding of the distributional and recognition justice aspects takes shape as we move through the other phases of the integrated system planning process towards implementation.*

- b. Can PSE clarify how it plans on iterating its modeling assumptions throughout the ISP development based on RPAG feedback to account for distributional equity?

*PSE will continue to use feedback from the RPAG where appropriate throughout the development of the ISP. As previously noted, the ability to address equity increases as we move along the timeline. We have endeavored to incorporate equity considerations into our modeling assumptions primarily through recognition and procedural steps given future resource needs are typically analyzed as generic assumptions. The opportunity to address distributional equity grows as we develop specific actions and plans with known, real-world benefits and impacts.*

4. PSE made clear in the RPAG that important equity data on emissions for portfolio analysis is only available at a system level. In portfolio analysis, are there any ways to analyze specific resource locations/geographic constraints? For equity analysis it will be important to have geographic specificity wherever possible so that equity impacts can be analyzed across populations, such as impacts on emissions and air quality, job creation, and so on.

*As noted above, it is difficult to attempt to analyze specific resource locations/geographic constraints when using generic resources. These generic resources do not contain detailed attributes to provide insight into equity impacts. However, in the implementation phase, such as our resource acquisition process, we have known project locations and details, and PSE is able to better understand equity considerations of each resource.*

5. On slide 14 there is no mention of restorative equity in any of the programs. How is PSE incorporating restorative justice into the planning modeling and analysis?

*PSE envisions restorative justice as the culmination of procedural, recognition and distributional justice being considered alongside some form of direct impact being realized by a specific customer group. In the modeling and analysis phase we are not analyzing specific programs; at this stage in the planning process, we are not able to identify specific actions nor take steps to implement them. Restorative justice can be realized through the implementation of projects, programs, products, and services collectively.*

#### Distributional Equity (for Distributed Energy Resources)

1. During the RPAG, PSE indicated that DEAs are only effective for longstanding programs and less effective for programs in the developmental stages. Staff notes that at the most basic level, a DEA answers this fundamental question: *What are the distributional equity impacts of utility resource investments in the context of cost-effectiveness evaluation?* (Distributional Equity Analysis for Energy Efficiency and Other Distributed Energy Resources (May 2024), page xiii). In the context of this question, a DEA can be applied retrospectively or prospectively but in either case, the DEA is applied to inform a future utility investment decision and to



complement a benefit-cost analysis. This means a utility can apply a DEA to either a long-standing program, such as a net energy metering program, or a new program, such building electrification or electric vehicle supply equipment. Further, DEAs can be applied to a portfolio of resources regardless of its age.

a. Can PSE clarify its view on why it views DEAs as only effective for longstanding programs?

*PSE appreciates the opportunity to clarify our position on DEA effectiveness. Our view is not that DEAs are only effective for longstanding programs, but rather that DEA methodology achieves optimal analytical value when applied to programs with sufficient operational data and defined implementation parameters.*

*The key distinction is between programs with:*

- **Concrete operational characteristics:** Defined participation mechanisms, measurable customer impacts, established rate structures, and documented outcomes
- **Conceptual planning resources:** Generic capacity additions or portfolio-level assumptions that lack the program-specific details necessary for rigorous distributional analysis

*Our DEA experience confirms that meaningful equity analysis requires granular data on participation patterns, customer demographics, bill impacts, and community-level outcomes. When these elements are available — whether for new or existing programs — a DEA provides actionable insights for program design and policy decisions.*

2. The DEA guidebook outlines multiple potential applications of DEA, which may include assessing a single DER program serving priority populations, assessing a single DER program serving all types of customers, and comparing across DER programs of either the same or different types of DERs. (Distributional Equity Analysis for Energy Efficiency and Other Distributed Energy Resources (May 2024), page 23.) As a general comment, Staff recommends PSE consult the RPAG directly on how best to measure distributional equity across its DER portfolios, and the appropriateness of analyzing distributional equity at more granular levels.

*Thank you for your feedback; PSE welcomes further discussion with Staff regarding this topic.*

a. Building electrification

- i. How is PSE measuring and evaluating distributional equity for its targeted electrification pilot? Does PSE intend to provide this information to the RPAG in the context of its equity consultation?

*PSE explores mechanisms to address distributional equity in the approach outlined in the Targeted Electrification Pilot's Strategy Report, located here: [2025\\_0131\\_TargetedElectrificationStrategyReport.pdf](#). PSE has not determined if/when it might make sense to discuss this with the RPAG.*

- ii. How is distributional equity of electrification being considered in PSE's various electrification scenarios?

*Scenarios are intended to provide hypothetical futures primarily reflecting differences in load forecasts. PSE intends to analyze distributional equity in this context.*

- iii. How does PSE intend to analyze distributional equity for its future electrification programs in the context of its cost-effective analysis?

*Distributional equity is not a consideration for cost-effectiveness and will be considered separately.*

b. DERs

- i. How does PSE intend to analyze distributional equity in the context of cost-effectiveness for its distributed storage, solar, and demand response programs?

*PSE is currently working with interested parties on a DEA for an 80 MW DER portfolio under Order UE-240004. This process will be instructive for considering distributional equity across future DER programs. Please see response 1.a and 2 above regarding the context required to effectively evaluate resources in a formal DEA.*

- ii. Slide 23 indicates its DER portfolio incorporates DEA pilot learnings (for community solar and NEM). PSE was previously ordered to conduct DEA for the entirety of its distributed solar portfolio. (Wash. Utils. & Transp. Comm'n v. Puget Sound Energy, Docket UE-240004 & UG-240005, Order 09, at 57-58 ¶ 175 (Jan. 15, 2025)). Can PSE clarify both its requirements for completing this requirement and what learnings it is using to inform its DER portfolio?

*PSE is currently working on the DEA required under Order 09 in UE-240004 and UG-240005 in that filing.*

- 2. Staff acknowledges and appreciates the long-standing work towards incorporating non-energy impacts into its conservation portfolio.

- a. How are non-energy impacts incorporated into the design and evaluation of other DER programs, including solar, storage, and demand response?

*PSE's acquisition of other DER programs considers some NEIs in addition to energy impacts. Generally, these impacts are focused on greenhouse gas impacts and reliability benefits derived from storage resources.*



- b. Does PSE have plans for considering non-energy impacts in the design of its electrification program?

*PSE will consider appropriate non-energy impacts in determining the lowest reasonable cost of electrification measures in the ISP at the portfolio level.*

3. On slide 23 PSE notes breaking out vulnerable populations within the Conservation Potential Assessment. Does PSE adopt a similar approach when conducting its DR and Solar Potential Assessments? If not, how does PSE account for equity within those studies?

*PSE does not break out vulnerable populations in the current DR and Solar Potential assessments. However, these assessments do consider equity in other ways. In the DR assessment, PSE considers incentives for participation. In the Solar Potential Assessment, PSE considers a vulnerable population discount rate, an updated adoption rate, and historical vulnerable population adoption rate. This assessment also considers the technical potential for solar on multifamily building rooftops.*

4. On Slide 19, PSE notes that it is incorporating climate change by assuming warming over time. How is PSE considering climate change with regard to worsening extreme weather events and their impact on both load and equity.

*For the Resource Adequacy Analysis, E3 used historical weather conditions to capture any extreme past weather events along with the future-looking climate change data used in the 2021 Power Plan. This was incorporated in the demand simulations, hydro, wind, and solar generation that correlate with those events. These events impacted the resource adequacy analysis planning margin and resource ELCCs.*

5. What does PSE see as the key performance indicators or accountability measures for tracking progress on equity over time?

*Advancing equity is a PSE-wide effort that spans beyond the bounds of the ISP. For ISP purposes, PSE intends to, at a minimum, track approved customer benefit indicators required by CETA.*

## Public feedback

### 2. Don Marsh, October 28, 2025, public comment opportunity

This is Don Marsh representing Sierra Club and the Washington Clean Energy Coalition.

I would like to comment on slide 14, which focused on temperature and climate change as the primary equity issues connected to the Demand Forecast. We think there are other issues to consider.

In a recent RPAG meeting, PSE provided a graph that forecasts the main drivers of electric demand over the next 20 years. In that graph, demand from data centers and demand from building electrification were almost non-existent. If these sources of electric demand are underestimated, it could have major impacts on both distributional and restorative justice for named communities.

For example, if significant demand from new data centers materializes, it is likely to have negative impacts on non-urban communities. New demands from data centers have already been shown to raise costs, increase air and noise pollution, and reduce reliability. The customers who would be saddled with these impacts aren't the same as the customers who benefit from data center services.

A recent study by Rewiring America shows how incentives for solar panels, batteries, and heat pumps could help named communities reduce their energy costs, improve reliability, and free up resources for use by data centers. PSE can play a productive role in this process. A good step would be to better support building electrification, especially for named communities.

I also want to mention reliability. Named communities often face a double challenge. First, PSE invests in redundancy and smart grid enhancements where there are critical services, like hospitals and fire stations and large companies. If a customer lives some distance from these services, their grid services may be less resilient. When a storm hits, PSE prioritizes restoration of power to the areas that have critical services, so named communities are often restored later. There might be good arguments for this prioritization, but it is the opposite of equity.

We would like to see equity considered throughout PSE's system. Although these details may not be addressed in the ISP, this is the planning process that lays out the map and the aspirations. If they aren't considered here, these equity issues may not be prioritized in system design and emergency response.

*Thank you for your feedback. PSE considers equity throughout our system. Details can be found in our Energy Equity Overview in UTC Docket 240004: <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=2746&year=2024&docketNumber=240004>.*