Resource Planning Advisory Group feedback report

Meeting details

- Tuesday, June 23, 2026, 1:00 p.m. - 3:00 p.m.
- Virtual webinar hosted by PSE and facilitated by Maul Foster & Alongi
- Links to:
  - Presentation
  - Agenda
  - 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. 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. *PSE responses are in teal italics.*

1. RPAG member feedback

Quinn Weber on behalf of the Washington Utilities and Transportation Commission staff, June 30, 2026 via isp@pse.com

General:

This meeting about transmission and distribution, was initially slated to be about the equitable distribution of resources. The RPAG has deviated from the Workplan and PSE should take steps to notify the RPAG that it intends to deviate from the workplan. Staff requests the company file an updated workplan that fleshes out what the last 6 RPAGs of the year are meant to discuss. A change in meeting topic represents a significant change to the workplan, and per WAC 480-96-080(c)(vi), warrants an update.

As discussed with staff, PSE plans to file an updated work plan reflecting additional details regarding engagement through the remainder of the planning cycle by the end of August 2026.

PSE has not upheld its commitments in the Charter it agreed to with RPAG members, which includes being clear about the IAP2 spectrum and promote a transparent exchange of ideas. It is

not transparent to the deviate from the workplan with no notice and affects RPAG members' ability to prepare for the meetings.

PSE maintains regular communication with RPAG members and clearly communicated our intent to extend the discussion of the reference case through the June RPAG meeting through direct communication and presentation content. Additionally, PSE's work plan clearly indicates dates and topics are approximate and subject to change. Going forward, PSE will continue to endeavor to provide as much clarity as possible.

We have also noticed that these slides still do not contain specific questions or clear areas where RPAG participation is necessary. Staff has raised this concern before and found that PSE has been unresponsive towards our concerns, see 10/28/2025 feedback report. The point of limiting the RPAG to subject matter experts, and limiting public comment, was to create a more focused setting for PSE to leverage expert feedback in the development of the plan. That includes knowing what gaps PSE has in its decision making. PSE has done this before, with the Cost Test RPAGs.

In the May RPAG PSE specifically asked the following questions and intentionally made space for every RPAG member to provide feedback (if they desired):

- *What are your observations on the recommended reference case?*
- *Do you have other feedback on the approach to solving the reference case?*
- *Do you have any remaining questions?*

Similar slides and questions are in the January, February, and March 2026 RPAG meeting slides. PSE inadvertently omitted a similar slide from June. However, the June RPAG meeting was a continuation of the results conversation from the May RPAG meeting and resulted in a continued, robust discussion around the reference case.

Staff recommends that PSE:

- Resume its previous practice of identifying RPAG topics with the IAP2 spectrum or by next meeting propose a charter update to identify something fit for purpose to communicate how PSE is engaging the RPAG for feedback.

  PSE has and will continue to include references to the IAP2 spectrum where appropriate.

- Include specific questions for the RPAG on future slides to facilitate robust discussion on key decision points in the ISP development process.

  PSE will continue to do this using the slide format recommended and acknowledged by staff.

- Recommend that PSE file an updated workplan that:
  - Updates past topics,

- Updates the last half of the year with more specific topics
- Lays out procedures for how PSE will deal with needed deviations in topics if they arise, including reasonable notice to RPAG members. This may also necessitate an amendment to the RPAG Charter.

PSE has previously committed to updating the work plan and will do so by the end of August 2026. PSE will include information as required by WAC 480-96-080(4)(c). PSE does not believe a charter amendment is necessary at this time.

Distribution Planning:

- Staff recommends that PSE investigate alternatives to assuming an even spread of customer programs.

  Thank you for the feedback. PSE will consider this for future ISP cycles but is not aware of any methodology that would allow this level of analysis at this time.

- PSE mentioned on slide 15 around the hour mark of the RPAG, that it obtains data based on load requests. What does PSE consider a load request? Is that only interconnection requests or does it connect those requests to EV modeling?

  PSE's distribution planning analysis uses the same demand forecasts as other workstreams. In this case, we are using the reference demand forecast which includes the EV forecast and large load requests with a high probability of interconnection.

- What informs PSE's decision to pick a 30% success rate for non-wires solutions? PSE had mentioned no successful application of non-wires solutions to date. Why have they been unsuccessful in the past and what circumstances does PSE believe will change that will lead to them being potentially at least 30% successful?

  This metric is informed by real-world observations of PSE non-wires projects. PSE defines success as the ability to implement a non-wire alternative at a substation and therefore defer a traditional substation capacity investment for a period of 10 to 15 years. External sources also indicate a success rate ranging from 16%[1] to 40%[2]. PSE will perform a sensitivity analysis that evaluates success rates of 20%, 30%, and 40%.

Transmission Planning:

- Could PSE clarify what the "Low" and "High" build scenarios on slide 25 under "Reference Case transmission costs incorporated presumed local and regional system builds" represent? Where did low and high scenarios come from?

[1] https://www.aceee.org/sites/default/files/pdfs/ssi23/2_102_%20smallwood.pdf
[2] https://www.woodmac.com/news/editorial/us-nwa-on-the-table/

Transmission builds required to integrate resources on the PSE system will be dependent on where those resources are interconnected. PSE analyzed five different scenarios for interconnecting resources on the system, with locations informed by the interconnection queue as well as known capacity constraints on the system, siting/zoning constraints, and local/regional policies on energy development. PSE identified the transmission builds needed for each of those scenarios. The low column represents the low range of transmission builds while the high column represents the high range of builds needed to integrate the 3,000 MW of resources that were modeled. This analysis was limited to builds required to incorporate resources on the local system and do not reflect the costs associated with resources interconnecting outside of the PSE system that would utilize regional transmission for delivery to PSE.

This methodology was discussed with the RPAG during the Feb. 27. 2025 RPAG meeting and the sensitivities were developed using RPAG feedback.

- PSE noted that the resource builds on slide 24 are based on the 2023 Electric Progress Report and therefore may not represent the most accurate forecast of where new resources could be located. Given that "resource integration will likely drive system improvements and will require reasonable assumptions of where these resources may be developed on-system", does PSE anticipate refreshing these resource build forecasts as part of this ISP process? If so, does PSE have an expected timeline for that work?

  We started with the 2023 Electric Progress Report to help provide scenarios for generation siting. Our current analysis looks at the new volume of resources within PSE's system and compares that against our prior generation siting work.

- In its list of sensitivities for portfolio buildouts, how does PSE believe these sensitivities will interact with other portions of the model?

  The purpose of sensitivities is to test variables to better understand how single changes might impact the overall portfolio. PSE prefers not to speculate about outcomes which can be wide-ranging and unexpected.

- In the February RPAG, PSE mentioned a sensitivity to align with the WRAP, however that no longer seems to be under consideration. Is that correct?

WUTC Staff is correct. Puget Sound Energy (PSE) initially considered performing a sensitivity analysis to align with the Western Resource Adequacy Program (WRAP) metrics but has deprioritized this due to difficulties aligning with WRAP's long-term resource adequacy calculations. In the near term, PSE shifted focus to addressing challenges in developing a portfolio of commercially available resources to meet customer needs under the Clean Energy Transformation

Act (CETA). These factors led PSE to prioritize resolving commercial resource challenges over aligning with long-term WRAP metrics.

Katie Ware on behalf of Renewable Northwest, June 30, 2026 via isp@pse.com

I. INTRODUCTION

Renewable Northwest ("RNW") appreciates Puget Sound Energy's ("PSE" or "the Company") continued engagement with stakeholders during development of its 2027 Integrated System Plan ("ISP"). The June 23, 2026, Resource Planning Advisory Group ("RPAG") meeting provided additional information on PSE's electric distribution and transmission reference cases, and PSE has invited stakeholders to identify risks, tensions, and points of misalignment early in the process.

RNW continues to be concerned by PSE's decision to move forward with Reference Case B despite RNW's and UTC Staff's request that PSE develop a middle-ground reference case. PSE has explained that Reference Case B allows the model to solve and provides a consistent baseline for later scenario and sensitivity analysis. RNW does not object to PSE using a reference case as a starting point. However, the reference case should not embed assumptions, constraints, or modeling logic that bias later scenario analysis or narrow the range of resources evaluated under the ISP rules.[3]

Our feedback focuses on four issues raised by the June RPAG materials and PSE's responses to May feedback:

1. PSE should apply the WAC definition of "commercially available" and develop a middle-ground Reference Case C that reflects that definition;
2. PSE should preserve meaningful testing of alternative resource and transmission combinations;
3. PSE should provide additional support for its distribution BESS and nonwires assumptions; and
4. PSE should more transparently account for transmission and fuel security costs.

II. FEEDBACK

A. PSE should apply the WAC definition of "commercially available" and develop a middle-ground Reference Case C.

PSE's response to RNW's May feedback states that PSE defines "commercially available" to mean that "there are multiple vendors for a specific technology that could bid into an open RFP."[4] RNW remains concerned that this definition is narrower than the definition in WAC 480-96-020(5), which defines "commercially available" to mean that a resource "is currently available for purchase,

[3] Chapter 480-96 WAC:

[4] PSE Resource Planning Advisory Group feedback report, *available at* https://irp.cdn-website.com/dc0dca78/files/uploaded/2026_0528_FeedbackReport_Final.pdf.

procurement, or installation, or is reasonably anticipated to be available within the integrated system plan's study period."[5]

PSE's definition imposes additional requirements not found in the WAC, including a multiple-vendor requirement and a near-term RFP availability screen. The WAC definition is broader. It includes resources currently available for purchase, procurement, or installation, as well as resources reasonably anticipated to be available within the ISP study period.

RNW does not suggest that PSE should ignore uncertainty. If PSE believes—based on data-driven reasoning—a resource is immature, costly, constrained, dependent on uncertain fuel supply, or subject to deployment risk, PSE should model those risks transparently through supported availability dates, build limits, cost ranges, sensitivities, fuel limits, and risk treatment. But PSE should not use a narrower company-specific definition to move resources out of the commercially available case when the ISP rules define the term differently.

The WAC offers room for interpretation on what is reasonably anticipated to be available within the study period. There are a lot of risks and unknowns with emerging technology. We know what is available today and we can make a reasonable assumption about everything else. What is available today is wind, solar, gas turbines, and lithium-ion batteries. So, we ran the initial reference with those technologies (reference A). But what if we broaden that definition and make assumptions on availability dates for emerging technologies? That broader definition was used for reference B, which we will be moving forward with as the starting point of the analysis.

When we note a first year available, we are saying that the resource will have a commercial online date (COD) of Jan 1, 2035, for example. For a COD of 1/1/2035, we will need to start in 2030 at the latest to begin the procurement and permitting process, ideally sooner given the longer lead times for supply and permitting. This resource will need to be at full production by 2030 with at least one or two full-scale facilities in operation in order to make an informed decision.

RNW again recommends that PSE develop a middle-ground Reference Case C that better reflects the WAC definition of commercially available. This case should include, at minimum, a fuller suite of battery storage options, including 4-, 6-, and 8-hour durations; reasonably available biodiesel or other CETA-compliant fuels where PSE can support near- or mid-term availability; and a smoother phaseout of existing gas capacity that does not create a dramatic 2045 capacity cliff that the model then cannot solve without emerging technologies.

Reference Case C should also more carefully diagnose the transmission constraints that appear to be driving PSE's modeling results. If transmission constraints are preventing commercially available or reasonably anticipated CETA-compliant resources from solving, PSE should identify which constraints bind, where, and when. PSE should incorporate practical transmission-relief options including grid-enhancing technologies ("GETs") where they could unlock lower-cost resources on

[5] WAC 480-96-020(5).

the existing grid. Threshold transmission assumptions should be addressed in the reference case itself, not deferred to later sensitivities.

Thank you for this feedback; however, PSE plans to proceed with Reference B as the reference case. PSE is confident the sensitivity analysis will account for the ideas and concerns described above.

B. PSE should clarify that Reference Case B will not lock in a modeling hierarchy before alternatives are tested.

PSE has stated that Reference Case B is a starting point, not the preferred portfolio. However, the June materials raise questions about whether Reference Case B may also establish assumptions or modeling logic that could shape later results before alternatives are fully tested. During the June meeting, PSE stated that the ISP uses the PSE Zone to "balance resource needs after regional transmission capacity has been fully utilized."[6] PSE should clarify whether the model co-optimizes regional resources, regional transmission, PSE Zone resources, and local transmission upgrade costs, or whether it first exhausts regional transmission and then uses PSE Zone resources to meet remaining needs.

The portfolio model optimizes across all transmission zones, including the PSE zone, and resources available within the zones to find the lowest cost mix of resources to meet requirements. Typically, resources outside the PSE zone have lower costs and are selected first by the optimization model. The PSE zone serves as a balancing mechanism because the model prioritizes building the most cost-effective resources first, which are often located in other transmission zones. The transmission limit assumptions are set for the reference case, so we will evaluate different levels of transmission availability and costs in sensitivities to compare the value to the portfolio.

If this is a sequential approach, PSE should test whether different combinations of regional transmission, conditional firm transmission rights, GETs, local BESS, DERs, and local transmission upgrades would produce a lower reasonable cost portfolio. PSE should also clarify what "fully utilized" means, whether PSE Zone resources have a build or siting limit, and whether local transmission costs are endogenous to resource selection or applied through an average $/MW adder.

PSE should better support its electric distribution BESS and nonwires assumptions.

PSE's June slides state that PSE identified ten substations that could potentially be deferred by co-location of a 5 MW BESS, but assumed a 30 percent success rate, resulting in three total substations deferring maintenance investments. During the meeting, PSE said this was a first pass estimate based in part on the fact that PSE has not previously been able to successfully implement this strategy. But PSE's historical lack of implementation may reflect procurement design, siting

[6] Slide 26

barriers, or internal planning practices—not enough to justify a low 30% success rate over a 25-year planning horizon.

RNW recommends that PSE provide, for each of the ten candidate substations, the expected MW overload, overload duration, seasonal timing, year of first overload, upgrade cost, BESS cost, and whether a paired BESS/nonwires portfolio could defer or reduce the investment. PSE should also test alternative success rates or develop location-specific success rates based on actual substation conditions.

One additional note—slide 18 appears to include a calculation or labeling error in the 2026-2030 row. The table lists $1,007 million in capacity investment and $0 million in incremental maintenance investment, but only $660 million in total investment.

PSE appreciates RNW's recommendation to provide additional substation-specific overload information. At this stage, PSE does not believe developing detailed projections for each candidate substation ten years into the future would provide meaningful precision, given the inherent uncertainty in long-term load growth, customer adoption patterns, and localized system conditions. However, PSE agrees that testing alternative non-wires alternatives (NWAs) success rates would provide useful insight into the cost implications and planning value of NWAs. Accordingly, PSE will evaluate success rates of 20%, 30%, and 40% as part of sensitivity analysis. PSE also appreciates RNW identifying the issue on slide 18 and agrees that the total investment for 2026–2030 should be $1,007 million.

PSE should improve transparency around transmission and gas/fuel-security cost assumptions.

PSE's June presentation highlights the central role of transmission constraints in the ISP. PSE should also provide more detail on how transmission options and costs are represented in the reference case and sensitivities.

First, RNW recommends that PSE evaluate a sensitivity that includes conditional firm transmission rights that would test whether a portfolio using a blend of firm, conditional firm, and other structured transmission products can reduce costs while maintaining reliability. Second, PSE should evaluate GETs explicitly, including dynamic line ratings, topology optimization, advanced power-flow control, and advanced conductors. We notice that advanced conductors are included in the June appendix as a potential transmission solution, but we encourage a full suite of GETs be considered for their ability to increase transfer capability, reduce congestion, and potentially defer or reduce the need for new transmission investment.

BPA's conditional firm product is offered at the same tariff rate as firm transmission service, and it is currently being offered as a bridging mechanism pending system upgrades that would transition conditional firm to long-term firm service. Further, BPA has indicated that they are contemplating the introduction of pancaked rates where incremental segmented rates will be applied to system upgrades required to grant long-term firm transmission service. Conditional firm transmission service also carries additional curtailment risk that is difficult to quantify, leaving significant

uncertainty as to whether the capacity will be available when it is needed. Ultimately, the use of conditional firm transmission service could be more costly and risky than current portfolio assumptions on transmission availability. PSE is evaluating a number of transmission sensitivities related to BPA transmission service in the ISP which will inform the selection of the preferred transmission portfolio.

PSE is actively investigating the use of GETs and their potential for increasing capacity on the transmission system. We are currently undergoing a DLR pilot and recently submitted an application under the DOE SPARK Grant opportunity to expand the use of DLR on key lines across the transmission system. Our SPARK Grant application also included the reconductoring of four transmission lines and proposed the use of two different advanced conductor technologies for these reconductors. In addition to DLR and advanced conductors, we have long considered advanced powerflow control devices, such as phase shifting transformers, as solutions to relieve capacity constraints on the system. The latest example is the West Sound Grid Improvement project that is currently under study. We are also in the process of implementing the use of system adjustments, and particularly generation redispatch and topology optimization, to mitigate system constraints during our annual transmission planning study process.

Furthermore, PSE should ensure that gas and flex-fuel resources are compared to non-gas alternatives in an all-in cost basis. If PSE models gas or flex-fuel resources as firm, dispatchable capacity, the modeling should include the fuel-security costs required to make those resources available during the reliability events they are intended to serve. These costs may include firm transportation, compression, onsite or offsite storage, backup fuel capability, extreme-weather deliverability risk, and any associated gas-system costs recovered outside the electric supply model.

We agree we should be modeling all the costs, which is why we have included the costs needed for firm pipeline capacity and upgrades necessary to expand capacity, transport costs from multiple hubs for fuel supply security, onsite storage for backup fuel, and the cost of 72 hours of back-up fuel for every year. This is all included in the levelized cost of peakers listed on slide 81 of the May 28, 2026 RPAG deck.

III. CONCLUSION

RNW thanks PSE for its consideration of this feedback. We look forward to continued engagement in the RPAG process toward development of PSE's 2027 ISP.

Thank you for your feedback. We also look forward to the continued dialogue.

2. Public feedback

Don Marsh on behalf of the Washington Clean Energy Coalition, June 23, 2026 via public comment opportunity

I'm Don Marsh, Chair of the Washington Clean Energy Coalition and a member of the Sierra Club Energy Committee. We appreciate the work behind the analysis today, but PSE is offering a choice between two extremes; an all-battery case PSE calls unrealistic and Reference B, the largest gas buildout in PSE's history – approximately 20 new gas peaker plants. Even if PSE performs lots of sensitivity studies, this framing biases the outcome from the start. I've served on at least three advisory groups in the past, and I watched as sensitivities that were requested by a majority of group members were not studied because PSE ran out of time. So I'd like to make three points which align with requests this group has heard previously. First, please model a middle reference case. Both UTC staff and Renewable Northwest have asked for a realistic case between the two extremes; more robust than all batteries, but not leaning on emerging gas peakers. PSE repeatedly declined these requests. We urge you to model a neutral baseline that doesn't require $100 billion of batteries or five gigawatts of gas. Second, please model storage and iron air batteries realistically. PSE credits new storage at roughly 10% of its capacity and treats 100-hour iron air as unavailable until 2035. These assumptions are contradicted by E3's regional study, which found iron air contributing 63-77% and by PSE's own plan to pilot a Form Energy iron air battery by the end of this year. Third, make the comparison symmetric and public. PSE hasn't disclosed what capacity value it gives the flex fuel peakers or whether the cost of securing and delivering their fuel is included in the $2,000 per kilowatt figure. If clean resources are subject to conservative discounts, the peakers should meet the same standard, with every assumption published side by side. The stakes for your customers and the regional economy are high. PSE's modeling shows customer costs rising nearly 7% a year, with billions of dollars of carbon allowance costs and decades of stranded asset risk. Finally, our ask is simple. Don't lock in this reference case until these assumptions are tested. We request independent validation of the key inputs. Get this right, and the plan can serve customers, the climate, and Washington law. Thank you.

As previously stated, our reference case does not reflect PSE's proposed plan for energy acquisition and should not be categorized as such. The reference cases reflect outputs from initial modeling efforts intended to explore potential approaches to meeting projected future electric and gas loads under current policy conditions and based on assumptions rigorously informed by advisory group and public feedback. We are analyzing multiple additional iterations (scenarios and sensitivities) to explore a range of possible portfolios prior to developing the preferred portfolio for the 2027 Integrated System Plan (ISP).

Please see below for clarifications:

- *PSE is evaluating 100-hour iron air batteries as an emerging technology, as they are not commercially available today. The first year available, in this case 2035, is the first year the resource can be expected to be operational. This assumes that procurement, permitting, and construction are complete prior to this date. We will revisit this assumption in the next ISP, at which time there may be a fully operational system in place and more concrete details about costs and availability can be assumed.*
- *PSE shared capacity contributions for resources during the Sept. 30, 2025 RPAG meeting (see slide 43). PSE's modeling dynamically adjusts resource capacity contributions as*

additional resources are added. As the resource becomes further saturated, the capacity value can decrease, specifically for variable energy resources and energy limited resources. For example, long duration storage ELCC starts above 80 percent for the first 1,500 MW installed then it starts to saturate to much lower levels closer to the short duration storage.

- *PSE assumes all fuel costs required to operate peakers in the model (fuel purchase, transport, and storage). Peakers have a capacity contribution of approximately 95% and do not saturate in the same way because they are firm resources.*

PSE plans to proceed with reference B as the reference case as a starting point for sensitivity analysis – an approach generally supported by the majority of RPAG members. PSE is confident the sensitivity analysis will account for the ideas and concerns described above.

Cynthia Mitchell, June 26, 2026 via isp@pse.com

I am a retired energy economist that recently moved back to Bellingham, WA after a 50-year career as community organizer, expert witness and consultant to state public utility commissions and utility consumer advocate offices. My expertise includes integrated resource planning (IRP), demand side resources, renewable energy, utility industry competition, restructuring, deregulation, and alternative regulation. First in Bellingham 2016-2020, I served on the Whatcom Climate Action Committee, consulted the Attorney General's Office on utility resource planning, and analyzed PSE's 2017 IRP-demand side resources for the Sierra Club. I am on the board of Whatcom Environmental Council.

PSE's RPAG presentation May 28, 2026, slide 81 "Technology modeled – first year available", shows "natural gas peaker", first year available 2031, capital cost 2020 $/kW vintage year 2025 of $1,624.[7]

This estimate is low due to shortages of heavy-duty gas turbines.[8] Also, because PSE assumes its first peakers in service 2030–2031, a 2025-vintage estimate understates the cost PSE will incur.

1. Please conduct a sensitivity on the capital cost of new gas peaking generation using $2500/kW vintage year 2030 for the first 1,924 MW of new gas additions.[9]

   Thank you for your comments. PSE will consider this along with other sensitivities. The E3 study found that even with the higher capital cost of peaking generation, they still play an important role. Given the results from the E3 report, we do not expect the increased cost to significantly change the builds.

   This is from the E3 report:

[7] https://irp.cdn-website.com/dc0dca78/files/uploaded/2026_0528_RPAG_Meeting_Final1.pdf, slide 81

[8] BloombergNEF (April 2026 - 66% Construction Cost Increase): FX Leaders: US Natural Gas Futures on Declining Output

[9] Source: E3's April 2026 Northwest Reliability Assessment, Technical Appendix, https://www.ethree.com/wp-content/uploads/2026/04/E3-NW-RA-Technical-Appendix_040826.pdf, slide 38.

"We find that, over the long run, the region can achieve deep carbon reductions while maintaining reliability and managing costs by investing in a diverse portfolio of resources, including energy efficiency, wind, solar, geothermal, transmission, and natural gas generation. Combining energy efficiency and renewable energy with new firm capacity provides the most affordable and resilient pathway across a wide range of scenarios modeled, representing a low-regrets strategy for the region.

Given limited near-term scalable alternatives to provide on-demand energy during critical reliability events, the analysis finds that new natural gas peaking capacity plays an important reliability role in the region. Flexible gas-fired resources provide backup during low hydro or low renewable periods, while turning off to avoid fuel purchases during periods when clean energy is plentiful, particularly later in the modeling period following a significant buildout of renewable energy resources. The results demonstrate that a limited amount of thermal capacity can complement high levels of clean energy to manage extreme conditions and multi-day reliability events."[10]

2. Use a 30-year depreciation period and include PSE's assumed bio-conversion costs.

   PSE uses a 35-year depreciation period and includes costs required to convert the facility to an alternative fuel as well as fuel transport and storage costs.

3. Please conduct a sensitivity with the adjusted capital costs in #1 above using depreciation periods for all new gas generation with an end of service date of 2045. (Example: in-service date 2030, 15-year depreciation; in-service date 2035, 10-year depreciation.)

   These assumptions were already included in reference A (except for the adjusted capital costs). PSE will consider this along with other sensitivities.

4. Please conduct a sensitivity per #2 above including a transparent accounting of the related infrastructure costs to provide fuel to the new gas generators with firm winter-peak availability. These costs include firm pipeline transportation capacity contracts, any required lateral or distribution-system reinforcement, and any necessary expansion of regional storage or LNG.

   Firm pipeline capacity and costs are already included in the natural gas peaker assumptions.

Don Marsh on behalf of Washington Clean Energy Coalition, June 30, 2026 via isp@pse.com

The Washington Clean Energy Coalition recently heard a report that PSE has purchased six natural gas turbines to meet your 2031 demand projections. This was surprising given your written assurances that the RPAG presentations "do not reflect PSE's proposed plan and should not be presented as such." Can you tell us how the cost of these turbines aligns with the cost estimates for

[10] Webinar & Report: Resource Adequacy and the Energy Transition in the Pacific Northwest - E3

gas peaker plants shown on slide 81 of your May 28 RPAG presentation? Is it standard practice to make these significant investments based on a reference portfolio that has not been fully analyzed, reviewed, or accepted? Do these acquisitions commit us to at least the first 5 years of Reference B, or can the orders be cancelled for a substantial refund if a different plan were to be adopted instead?

These recent resource acquisitions (published in PSE's 2026 General Rate Case) are a result of PSE's 2024 All-Source Request for Proposal (RFP) process, which was grounded in the analysis and need identified in both the 2021 Integrated Resource Plan and 2023 Electric Progress Report. The costs of these acquisitions are confidential. The resource acquisition process is separate from ISP modeling and not based on any draft reference case potential builds our modeling may produce. PSE's draft reference case reflects outputs from initial modeling efforts intended to explore potential approaches to meeting projected future electric and gas loads under current policy conditions and is a starting point for developing a preferred portfolio for the 2027 ISP.