BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

UE-200414

In the Matter of PUGET SOUND ENERGY COMPANY, Motion for Withdrawal of Draft Request for Proposals for All Generation Sources.	Renewable Northwest's Comments **October 7, 2020**

I. INTRODUCTION

Renewable Northwest is grateful to the Washington Utilities and Transportation Commission ("the Commission") for the opportunity to submit these comments on Puget Sound Energy's ("PSE") request to withdraw its 2020 All-Source Request for Proposals ("RFP").

Renewable Northwest provided feedback to the Commission on PSE's draft All-Source RFP on July 6, 2020, noting the importance of the RFP in setting PSE on a path toward compliance with the law-mandated milestones of the Clean Energy Transformation Act ("CETA").[1] Following PSE's informational update letter in Dockets UE-200413 and UE-200414,[2] in which PSE provided an updated electric-peak capacity need based on revisions to its load forecast, Renewable Northwest attended PSE's webinar on September 1, 2020,[3] which made available some of the assumptions informing PSE's revised load forecast.

Renewable Northwest responded to PSE's solicitation for stakeholder comments regarding a potential withdrawal of the RFP, recommending that PSE go forward with the RFP to 1) benefit from the present time-limited opportunity to procure non-emitting capacity resources eligible for federal tax credits, 2) get ahead of a potential regional capacity shortfall, and 3) accelerate the company's decarbonization efforts as part of its glide path to compliance with CETA.[4] We also understand and share the Commission's concern that PSE may be avoiding resource

[1] July 6, 2020 Comments of Renewable Northwest (Docket UE-200414).
[2] Aug. 26, 2020 Informational Filing Seeking Comments from Interested Parties on Potential Withdrawal of its Draft Demand Response and All-Source RFPs, Puget Sound Energy (Dockets UE-200413 and UE-200414).
[3] *See*, *e.g.*, Puget Sound Energy 2021 IRP Webinar #7: CETA Assumptions, Demand Forecast, Resource Adequacy, Resource Need (Sept. 1, 2020).
[4] Sept. 4, 2020 Comments of Renewable Northwest re: Puget Sound Energy's 2020 All-Source RFP (attached to these comments as Exhibit A).

procurements on the assumption that market purchases will fill PSE's approaching capacity needs.[5]

In these comments, we reiterate our aforementioned concerns with a potential withdrawal of PSE's All-Source RFP. While we understand the challenges to forecasting energy and capacity need in the midst of the COVID-19 pandemic, the best information available still suggests that this moment presents a unique opportunity to procure non-emitting capacity resources such as tax credit-eligible renewables that align well with PSE's periods of greatest capacity needs.

Renewable Northwest appreciates the Commission's commitment to ensuring a transparent resource procurement process, and we hope these comments will convey the risk not only to PSE, but also to PSE's retail customers, should the All-Source RFP be withdrawn and delayed.

II. COMMENTS

A. PSE's Updated Projections

In PSE's informational update letter, the company provides an updated electric-peak capacity need based on revisions to its load forecast to reflect, among other things, short list resources from PSE's 2018 RFP and the projected effects of the COVID-19 pandemic.

On the former, the public has been notified of three selected resources from the 2018 RFP: a Bonneville Power Administration (BPA) power purchase agreement (PPA) for 100 MW of energy and capacity,[6] a Sierra Pacific Industries (SPI) PPA for 17 MW of biomass energy,[7] and an Avangrid Renewables PPA for 200 MW of wind energy.[8] PSE indicated at the Commission's September 10 open meeting that the company is currently finalizing the last contract from the 2018 RFP. In comments to PSE, Renewable Northwest requested that the company clarify how much of the peak capacity need delta, from the May 2020 estimate to the August 2020 estimate, is attributable to the results of the 2018 RFP, because it is unclear why short-list resources would not have been accounted for in the 2020 All-Source RFP.

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[5] Sept. 10, 2020 Supplemental with a Revised Recommendation, Utilities and Transportation Commission (Dockets UE-200413 and UE-200414).

[6] "New agreements will deliver clean BPA power to PSE customers" (May 7, 2020), *available at* https://www.pse.com/press-release/details/new-agreements-will-deliver-clean-bpa-power-to-pse-customers.

[7] "PSE signs deal with local forest products company to create clean electricity" (Mar. 3, 2020), *available at* https://www.pse.com/press-release/details/pse-signs-deal-with-local-forest-products-company-to-create-clean-electricity.

[8] Puget Sound Energy and Avangrid Renewables Announce Power Purchase Agreement; Construction of New Wind Farm" (Aug. 18, 2020), *available at* https://www.pse.com/press-release/details/puget-sound-energy-and-avangrid-renewables.

On PSE's indication that the effects of the COVID-19 pandemic are now reflected in the August 2020 load forecast, we remain skeptical that a nation-wide modeling effort could reflect the unique trajectory of Washington state, which is currently seeing a decrease in overall COVID-19 case counts in both eastern and western Washington,[9] with its Department of Health preparing for equitable, rapid vaccine deployment.[10] PSE's incorporation of the pandemic's effects into its load forecast was sourced mainly from data published by Moody's Analytics, and PSE attributed deviations from the May to the August load forecast to the evolved projections made by Moody's about the economic forecast beyond the pandemic's close. However, as noted, Washington state's position as an early adopter of protective measures and rapid, widespread testing situates PSE's service territory differently from the data underlying the Moody's projections and undercuts PSE's projections. The economic effects on Washington do not resemble those of the country as a whole, with warning figures in Moody's August report focusing on the Northeast, the South, and California.

The revised load forecast presented to the Commission in August 2020 reflects a significant reduction from the load forecast documented in PSE's May 2020 All-Source RFP, extending to 2040, where the delta is 783 MW. When Chair David Danner asked at the previous open meeting whether PSE was certain the load forecast would not rebound prior to 2024, the company did not express confidence in its near-term forecast. Because the effects of this unprecedented pandemic are difficult to project, both in the near- and long-term, we caution the Commission from accepting PSE's assumptions which may affect not only PSE's ability to bring resources onto its system in time to meet load in excess of those projections but also PSE's ability to meet the clean energy standards of CETA.

B. Disadvantages of a Delayed All-Source RFP, for PSE and its Customers

Renewable Northwest has identified three key risks to a delayed RFP, which will likely impact customer rates, compromise PSE's resource adequacy, and make compliance with Washington's clean energy standards more difficult. In addition to the concerns already expressed by the Commission, we recommend the Commission weigh the following risks in making a decision with regard to PSE's request to withdraw its 2020 All-Source RFP:

[9] COVID-19 transmission at a crossroads in Washington state going into fall (Sept. 25, 2020), *available at* https://coronavirus.wa.gov/news/covid-19-transmission-crossroads-washington-state-going-fall.
[10] COVID-19 vaccine update from the Washington State Department of Health (Sept. 30, 2020), *available at* https://coronavirus.wa.gov/news/covid-19-vaccine-update-washington-state-department-health.

i. Customer Rate Benefits of Expiring PTC and Sunsetting ITC are Time Sensitive

The federal Production Tax Credit ("PTC") for wind and Investment Tax Credit ("ITC") for solar are both on an exit path, and there is a limited timeframe to pass their significant value on to PSE's customers. Wind projects must start construction by December 31, 2020, to qualify for the PTC, which would secure a value of approximately $15/MWh for ten years. For solar projects, including solar paired with storage, the ITC requires that projects come online by December 31, 2023, to qualify for an ITC between 22% and 30%. Projects that come online after 2022 receive a much lower 10% ITC. Especially critical at this moment, projects that safe harbor equipment this year -- 2020 -- could receive a 30% ITC, compared to a 26% credit next year and a 22% credit in 2022, with the project coming online by the end of 2023. With the *unsubsidized* value of renewables competitive with other generation technologies and tax credits available to further cut the costs of these resources, Renewable Northwest urges the Commission to consider this rate-impacting window of opportunity for PSE to meet its projected needs.[11]

In our comments to PSE regarding its consideration to withdraw the 2020 RFP, attached to these comments as Exhibit A, we provided additional analysis for how a delayed competitive bidding process could forfeit notable savings on the attractive resources PSE is modeling for its upcoming integrated resource plan (IRP). For example, the company projects Montana and eastern Wyoming wind to have capacity factors approaching 50% and generation profiles that align well with PSE's winter-peaking load, an explicit requirement for PSE's draft All-Source RFP. PSE's ongoing IRP process also acknowledges the value of Eastern and Western Washington solar, as well as a decrease in the overnight capital cost of battery storage since the previous resource planning cycle, the latter improving the economics of solar-plus-storage.[12]

The Commission should consider that the timing of PSE's resource procurement effort, specifically a 2020 RFP as opposed to a 2021 RFP, could provide PSE's customers not only the significant benefits of these resources on an unsubsidized basis but also the additional rate-reducing benefits of the expiring PTC.

ii. Regional Capacity Needs Should be Met with Near-Term Capacity Resources

While we recognize there are sources of uncertainty complicating PSE's capacity-need projections, Renewable Northwest recommends, as was also hinted by the Commission at its September 10 open meeting, that PSE view its need against the backdrop of regional conversations about potential capacity shortfalls. PSE has displayed uncertainty in its near- to mid-term capacity need, flagging the potential risk of regional shortfalls given that all

[11] For a comparison of unsubsidized costs, *see* Lazard's Levelized Cost of Energy 13.0 (2019).
[12] *See*, *e.g.*, Puget Sound Energy 2021 IRP Webinar #1: Generic Resource Assumptions (May 28, 2020).

northwestern utilities are operating under shared uncertainties. This uncertainty is particularly notable given recent circumstances in California, where (among other causes) the unavailability of three gas units and competition for energy across the West triggered rolling blackouts.[13] Procuring capacity now -- especially non-emitting capacity and/or tax credit-eligible renewable capacity -- can help to diversify the region's capacity resources, avoid shortfalls, and ensure regional resource adequacy.

We appreciate the Commission's effort to explore these issues at its September open meeting, noting concerns that PSE historically has over-relied on market purchases to meet capacity needs which may be best served with resource procurements. We understand those concerns and look forward to that continued line of questioning at the upcoming open meeting.

iii. Near-Term Capacity Resources Can Help PSE Meet Its Clean-Energy Obligations at the Least Cost to Customers

The Washington legislature intended the Clean Energy Transformation Act to do just that -- transform Washington's energy system. Not only does the Act mandate "greenhouse gas neutral[ity] by January 1, 2030"[14] and "that nonemitting electric generation and electricity from renewable resources supply one hundred percent of all sales of electricity to Washington retail electric customers by January 1, 2045,"[15] but it also requires an investor-owned utility such as PSE to "demonstrate that it has maximized investments in renewable resources and nonemitting electric generation prior to using alternative compliance options."[16] Should PSE withdraw its 2020 All-Source RFP amidst a known and quickly-approaching capacity need (which still exists, just in a slightly later year, even if PSE's updated load forecast is correct), PSE could not reasonably demonstrate that it has maximized investments in renewable resources and nonemitting electric generation. Accordingly, if PSE withdraws the RFP, it cannot have recourse to alternative compliance options in the future.

One final, perhaps obvious but nonetheless important, point for the Commission to consider is that, while PSE must demonstrate that it has maximized investments in clean resources for compliance with CETA, such a demonstration would not require PSE to procure resources beyond the needs of its customers. In other words, the decision to accept a bid to an RFP and

[13] Alex Gilbert & Morgan Bazilian, California power outages underscore challenge of maintaining reliability during climate change, the energy transition, *Utility Dive* (Aug. 19, 2020), *available at* https://www.utilitydive.com/news/california-power-outages-underscore-challenge-of-maintaining-reliability-du/ ("In combination with ... high demand, the proximate cause of the blackouts were generator outages. On Friday, a 500 MW natural gas unit tripped offline while another 750 MW gas unit unexpectedly remained out of service. On Saturday, the loss of a 470 MW gas unit combined with a 1,000 MW loss of wind power.").
[14] RCW 19.405.040(1).
[15] RCW 19.405.050(1).
[16] RCW 19.405.060(3)(b).

move forward with contracting or acquisition belongs to PSE. Moving forward with the 2020 All-Source RFP would likely improve the company's understanding of the market, perhaps lead to a low-cost clean resource to meet an approaching capacity need, but certainly not predestine PSE to follow the exact resource acquisition glide path represented in the draft All-Source RFP.

III. CONCLUSION

PSE has an impending capacity need, a time-constrained opportunity to fill that need with tax-incentivized non-emitting capacity resources, and an obligation to decarbonize its system to comply with the standards of the Clean Energy Transformation Act. As such, Renewable Northwest strongly recommends that the Commission reject PSE's request to withdraw its 2020 All-Source RFP, regardless of any uncertainties identified by the company.

Renewable Northwest appreciates the Commission's careful attention to this RFP, the substance of PSE's withdrawal request, and the impact such a withdrawal would have on the utility's customers. We look forward to further engagement throughout the RFP process.

Respectfully submitted this 7th day of October, 2020,

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EXHIBIT A

RENEWABLE NORTHWEST

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Date: September 4, 2020
To: Puget Sound Energy RFP Team
From: Katie Ware, Washington Policy Manager, Renewable Northwest
Max Greene, Regulatory & Policy Director, Renewable Northwest

Re: Puget Sound Energy's 2020 All-Source RFP

Dear RFP Team:

Renewable Northwest appreciates the opportunity to provide feedback to Puget Sound Energy ("PSE") regarding the possibility of PSE's withdrawing its 2020 All-Source RFP. Renewable Northwest recommends that PSE go forward with the RFP to benefit from the present time-limited opportunity to procure non-emitting capacity resources, to get ahead of a potential regional capacity shortfall, and to accelerate the company's decarbonization efforts as part of its glide path to compliance with the Clean Energy Transformation Act ("CETA"). While we understand the challenges to forecasting energy and capacity need presented by the COVID-19 pandemic, the best information available still suggests that this moment presents a unique opportunity to procure non-emitting capacity resources such as tax credit-eligible renewables.

PSE's Updated Projections

On August 26, 2020, PSE filed an informational update letter in Dockets UE-200413 and UE-200414 with the Utilities and Transportation Commission ("the Commission"). In the letter, PSE provides an updated electric-peak capacity need based on revisions to its load forecast to reflect, among other things, 1) short-list resources from PSE's 2018 RFP and 2) the effects of the COVID-19 pandemic.

On the former, the public has only been notified of three selected resources from the 2018 RFP: a Bonneville Power Administration (BPA) power purchase agreement (PPA) for 100 MW of energy and capacity,[1] a Sierra Pacific Industries (SPI) PPA for 17 MW of biomass energy,[2] and

[1] "New agreements will deliver clean BPA power to PSE customers" (May 7, 2020), *available at* https://www.pse.com/press-release/details/new-agreements-will-deliver-clean-bpa-power-to-pse-customers.
[2] "PSE signs deal with local forest products company to create clean electricity" (Mar. 3, 2020), *available at* https://www.pse.com/press-release/details/pse-signs-deal-with-local-forest-products-company-to-create-clean-electricity.

an Avangrid Renewables PPA for 200 MW of wind energy.[3] Renewable Northwest would like PSE to clarify how much of the difference in peak capacity need, from the May 2020 estimate to the August 2020 estimate, is attributable to the results of the 2018 RFP, because it is unclear why short-list resources would not have been included in the original load forecast reflected in the 2020 All-Source RFP.

On PSE's indication that the effects of the COVID-19 pandemic are now reflected in the August 2020 load forecast, Renewable Northwest appreciates PSE's attempt at its September 1, 2020, webinar to make available the assumptions of that modeling effort.[4] PSE's incorporation of the pandemic's effects into its load forecast was sourced mainly from data published by Moody's Analytics, and PSE attributed deviations from the May to the August load forecast to an evolution of projections made by Moody's about the economic forecast beyond the pandemic's close. However, in a report published by Moody's in August 2020, Moody's chief economist Mark Zandi indicates in the Forecast Assumptions that the baseline outlook considers the risk of a second wave of the virus to be low, particularly for a wave seriously disrupting businesses.[5] Also worth considering is Washington state's unique position as an early adopter of protective measures, with current infection rates leveling and in some counties decreasing.[6] The economic effects on Washington do not match those of the country as a whole, with warning figures in Moody's August report focusing on the Northeast, the South, and California.

The revised load forecast presented to the Commission in August 2020 reflects a significant reduction from the load forecast documented in PSE's May 2020 All-Source RFP, extending to 2040, where the delta is 783 MW. Because the effects of this unprecedented pandemic are difficult to forecast, both in the near- and long-term, we caution PSE from making liberal assumptions which may prove unsubstantiated and, thus, may affect PSE's ability to meet the clean energy standards of CETA.

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[3] Puget Sound Energy and Avangrid Renewables Announce Power Purchase Agreement; Construction of New Wind Farm" (Aug. 18, 2020), *available at* https://www.pse.com/press-release/details/puget-sound-energy-and-avangrid-renewables.

[4] *See*, *e.g.*, Puget Sound Energy 2021 IRP Webinar #7: CETA Assumptions, Demand Forecast, Resource Adequacy, Resource Need (Sept. 1, 2020).

[5] Moody's Analytics. (Aug. 2020). *Precis U.S. Maco* (Vol. 25, Number 5), *available at* https://www.economy.com/macropress.

[6] New report shows COVID-19 cases hitting a plateau in some areas of Washington state (Aug. 28, 2020), *available at* https://coronavirus.wa.gov/news/new-report-shows-covid-19-cases-hitting-plateau-some-areas-washington-state.

Conducting an RFP Now Would Allow PSE To Secure the Benefits of the Expiring PTC and Sunsetting ITC

The federal Production Tax Credit ("PTC") for wind and Investment Tax Credit ("ITC") for solar are both on their way out, and there is a limited window to pass their significant value on to PSE's customers. Wind projects must begin construction by December 31, 2020, to qualify for the PTC, which would provide a value of approximately $15/MWh for ten years. For solar projects, including solar paired with storage, the ITC requires that projects come online by December 31, 2023, to qualify for an ITC between 22% and 30%. Projects that come online after 2022 receive a much lower 10% ITC. Particularly important at this moment, projects that safe harbor equipment this year could receive a 30% ITC, compared to a 26% credit next year and a 22% credit in 2022, with the project coming online by the end of 2023. With the *unsubsidized* costs of renewables competitive with other generation technologies and tax credits available to further cut the costs of these resources, Renewable Northwest recommends that PSE take advantage of this limited window now to meet its projected needs.[7]

Taking a closer look at wind resources, in its IRP process PSE currently projects Montana and eastern Wyoming wind both to have capacity factors approaching 50% and generation profiles that align well with PSE's winter-peaking load.[8] Analysis conducted by E3 for PSE found that Montana and eastern Wyoming wind provides 50-60% capacity value to Northwest utilities.[9] Other utilities are finding similar results and looking to near-term wind procurements to meet similar needs -- Portland General Electric, for example, in its 2019 IRP identifies a preferred portfolio that includes Montana wind to meet the company's capacity needs and drive customer savings.[10] PacifiCorp has made the case that there is enough value -- including capacity value and customer savings -- in eastern Wyoming wind to justify building new transmission to deliver that resource to the company's customers.[11] Running a 2020 RFP as opposed to a 2021 RFP could pass along to PSE's customers not only the significant benefits of these resources on an unsubsidized basis but also the additional benefits of the expiring PTC.

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[7] For a comparison of unsubsidized costs, *see* Lazard's Levelized Cost of Energy 13.0 (2019).

[8] *See*, *e.g.*, Puget Sound Energy 2021 IRP Webinar #1: Generic Resource Assumptions (May 28, 2020).

[9] "Resource Adequacy in the Pacific Northwest," E3 (Mar. 2019), *available at* https://www.ethree.com/wp-content/uploads/2019/03/E3_Resource_Adequacy_in_the_Pacific-Northwest_March_2019.pdf, at 55.

[10] *See generally* Portland General Electric 2019 Integrated Resource Plan at sec. 7.3, pp. 195-206.

[11] *See generally* PacifiCorp 2019 Integrated Resource Plan at ch. 8, pp. 209-272.

PSE's ongoing IRP process acknowledges the value of both Eastern and Western Washington solar, while also indicating a decrease in the overnight capital cost of battery storage since the previous resource planning cycle.[12] Utilities are realizing the benefits of hybrid resources, including solar-plus-storage for its potential to provide flexible incremental capacity, to improve resource adequacy at times of peak demand, and to alleviate the intermittency of an increasingly renewables-driven resource mix.[13] Because this paired resource is eligible for the sunsetting ITC, the cost benefit to PSE customers is extremely favorable but time sensitive. Further, since the ability of the project to obtain the financial benefits of ITC is tied to the ability of the solar resource to charge the battery, solar-plus-storage resources ensure delivery of non-emitting energy to meet CETA compliance. Regional analysis conducted by Northwest Power and Conservation Council has shown a forecasted transition from winter to summer peaking needs in the future.[14] Capacity resources like solar-plus-storage have the ability to provide flexible and dispatchable power to meet those needs. Aligned to this observation, modeling efforts in PacifiCorp's 2019 IRP and Portland General Electric's 2020 IRP also show a significant buildout for hybrid resources like solar-plus-storage in their preferred portfolio and reference buildouts, respectively.

Conducting an RFP Now Would Provide a Reasonable On-Ramp for Long Lead-Time Resources To Provide Capacity that Aligns with PSE's Need

Renewable Northwest understands that pumped hydro projects likely intend to bid into the 2020 All-Source RFP if the RFP proceeds. These projects can offer significant benefits as non-emitting capacity resources, but their long lead times can pose challenges to development. If a pumped hydro project competes and is selected in PSE's RFP, that project's selection could help ensure the project is completed on a timeline that both works for the project and aligns with PSE's capacity need (the precise timing and extent of which we understand are presently uncertain).

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[12] *See*, *e.g.*, Puget Sound Energy 2021 IRP Webinar #1: Generic Resource Assumptions (May 28, 2020).

[13] Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company's ELCC Study Submission. Public Utilities Commission of the State of California (July 1, 2020), *available at* https://library.sce.com/content/dam/sce-doclib/public/regulatory/filings/pending/electric/ELECTRIC_4243-E.pdf.

[14] System Analysis Advisory Committee Meeting. Aug 5. Northwest Power and Conservation Council. https://nwcouncil.app.box.com/s/3zs5v9jr6k8wb1jnvsvrjlc2t6tqgdmx

Near-Term Capacity Resources Can Add Significant Value by Addressing Regional Capacity Needs

While we again acknowledge the uncertainty around the timing and extent of PSE's capacity need, Renewable Northwest recommends viewing the need through the lens of regional conversations about potential capacity shortfalls. To the extent there is uncertainty about PSE's need, we recommend mitigating the risk of regional shortfalls by erring on the side of procurement. This is particularly true given recent circumstances in California, where (among other causes, some of which likely have not yet been unearthed) the unavailability of three gas units and competition for energy across the West triggered rolling blackouts.[15] Procuring capacity now -- especially non-emitting capacity and/or tax credit-eligible renewable capacity -- can contribute to diversifying the region's capacity resources, avoiding shortfalls, and ensuring regional resource adequacy.

Near-Term Capacity Resources Can Help PSE Meet Its Clean-Energy Obligations at the Least Cost to Customers

Finally, the Washington legislature intended the Clean Energy Transformation Act to do just that -- transform Washington's energy system. Not only does the Act mandate "greenhouse gas neutral[ity] by January 1, 2030"[16] and "that nonemitting electric generation and electricity from renewable resources supply one hundred percent of all sales of electricity to Washington retail electric customers by January 1, 2045,"[17] but it also requires an investor-owned utility such as PSE to "demonstrate that it has maximized investments in renewable resources and nonemitting electric generation prior to using alternative compliance options."[18] PSE cannot reasonably demonstrate that it has maximized investments in renewable resources and nonemitting electric generation if it withdraws the 2020 All-Source RFP. Accordingly, if PSE withdraws the RFP, it cannot have recourse to alternative compliance options in the future.

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[15] Alex Gilbert & Morgan Bazilian, California power outages underscore challenge of maintaining reliability during climate change, the energy transition, *Utility Dive* (Aug. 19, 2020), *available at* https://www.utilitydive.com/news/california-power-outages-underscore-challenge-of-maintaining-reliability-du/ ("In combination with ... high demand, the proximate cause of the blackouts were generator outages. On Friday, a 500 MW natural gas unit tripped offline while another 750 MW gas unit unexpectedly remained out of service. On Saturday, the loss of a 470 MW gas unit combined with a 1,000 MW loss of wind power.").

[16] RCW 19.405.040(1).

[17] RCW 19.405.050(1).

[18] RCW 19.405.060(3)(b).

Conclusion

PSE has a looming capacity need, a time-limited opportunity to fill that need with particularly attractive non-emitting capacity resources, and an obligation to decarbonize its system to comply with the standards of the Clean Energy Transformation Act. Under these circumstances, Renewable Northwest strongly recommends that PSE proceed with the 2020 All-Source RFP regardless of any uncertainties identified by the company.

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