



**PUGET SOUND ENERGY 2023
ANNUAL CLEAN ENERGY
PROGRESS REPORT**
Pursuant to RCW 19.405 and WAC 480-100-650

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Table 1: Required Annual Clean Energy Progress Report contents under WAC 480-100-650(3)

WAC 480-100-650(3)	Report Section
(a) Beginning July 1, 2027, and each year thereafter, an attestation for the previous calendar year that the utility did not use any coal-fired resource as defined in this chapter to serve Washington retail electric customer load.	<u>Section 1</u> Attestation for the previous calendar year regarding coal-fired resources
(b) Conservation achievement in megawatts, first-year megawatt-hour savings, and projected cumulative lifetime megawatt-hour savings	<u>Section 2</u> Energy savings
(c) Demand response program achievement and demand response capability in megawatts and megawatt hours.	<u>Section 3</u> Demand response
(d) Renewable resource capacity in megawatts, and renewable energy usage in megawatt hours and as a percentage of electricity supplied by renewable resources.	<u>Section 4</u> Renewable resource data
(e) All renewable energy credits and the program or obligation for which they were used (e.g., voluntary renewable programs, renewable portfolio standard, clean energy transformation standards).	<u>Section 5</u> Renewable energy credits
(f) Verification and documentation of the retirement of renewable energy credits for all electricity from renewable resources used to comply with the requirements of RCW 19.405.040, 19.405.050, a specific target, or an interim target, except for electricity purchased from Bonneville Power Administration, which may be used to comply with these requirements without a renewable energy credit until January 1, 2029, as long as the nonpower attributes of the renewable energy are tracked through contract language.	<u>Section 6</u> Retirement of renewable energy credits
(g) Nonemitting resource capacity in megawatts, and nonemitting energy usage in megawatt hours and as a percentage of total electricity supplied by nonemitting energy.	<u>Section 7</u> Nonemitting energy
(h) The utility's greenhouse gas content calculation pursuant to RCW <u>19.405.070</u> .	<u>Section 8</u> Greenhouse gas content calculation
(i) An electronic link to the utility's most recently filed fuel mix disclosure report as required by RCW 19.29A.140.	<u>Section 9</u> Fuel mix disclosure report
(j) Total greenhouse gas emissions in metric tons of CO ₂ e.	<u>Section 10</u> Greenhouse gas emissions
(k) Demonstration of ownership of nonpower attributes for nonemitting generation using attestations of ownership and transfer by properly authorized representatives of the generating facility, all intermediate owners of the nonemitting electric generation, and an appropriate	<u>Section 11</u> Ownership of nonpower attributes

WAC 480-100-650(3)	Report Section
company executive of the utility; the utility may not transfer ownership of the nonpower attributes after claiming them in any compliance report.	
(l) Other information the company agreed to or was ordered to report in the most recently approved CEIP or biennial CEIP update.	Section 12 Other information

Table 2: Required Annual Clean Energy Progress Report contents under WAC 480-100-650(4)

WAC 480-100-650(3)	Report Section
(a)(i) Total Washington retail sales.	Section 13 Total retail sales
(a)(ii) Retail sales for customers participating in a voluntary renewable energy purchase program in alignment with RCW 19.405.020(36)(b).	Section 14 Retail sales for voluntary renewable programs
(a)(iii) Total electricity production for all renewable and nonemitting generation owned, contracted, or controlled by the utility.	Section 15 Total electricity production
(a)(iv) Generation from qualifying facilities as described in RCW 19.405.020(36)(a).	Section 16 Generation from qualifying facilities
(a)(v) All electricity sold or transferred for all bundled sales of electricity from renewable and nonemitting sources. For the purposes of this subsection, bundled electricity is electricity that is sold with all its nonpower attributes in the same transaction.	Section 17 Bundled sales of electricity
(a)(vi) All electricity sales in which the electricity was sold by that utility in a wholesale market sale without its associated nonpower attributes.	Section 18 Wholesale market electricity sales
(b)(i) Total monthly megawatt-hours of sales, purchases, and exchanges by counter party of electricity sales in which the electricity was sold by that utility in a wholesale market sale without its associated nonpower attributes. Any contract in which the utility sells electricity in a wholesale market sale without its associated nonpower attributes must include terms stating the seller is not transferring any of the nonpower attributes and the buyer may not represent in any form that the electricity has any nonpower attributes associated with it and that the buyer must include such provision in any sale of the electricity in any subsequent sale it makes.	Section 19 Wholesale market sales in megawatt-hours
(b)(ii) Total monthly megawatt-hours of sales, purchases, and exchanges of bundled electricity from renewable	Section 20

WAC 480-100-650(3)	Report Section
or nonemitting generation. For the purposes of this subsection, bundled electricity is electricity that is sold with all of its nonpower attributes in the same transaction.	Bundled electricity from renewable or nonemitting generation
(b)(iii) All purchase contracts longer than one month that source the electricity delivered from coal fueled generation.	<u>Section 21</u> Coal fueled generation contracts
(b)(iv) Beginning January 1, 2026, all existing or new purchase contracts longer than one month with documentation that none of the electricity delivered is sourced from coal fueled generation.	<u>Section 22</u> Coal fueled generation contracts, beginning 2026
(b)(v) Any data provided to the Western power pool's resource adequacy program or its successor.	<u>Section 23</u> Western Power Pool data
<p>(c)(i)(A) Except as provided in (c)(iii) of this subsection, a utility may use an unbundled REC for alternative compliance only if the utility demonstrates: The associated electricity was sold, delivered, or transferred without fuel sources or nonpower attributes and under a contract or transaction term expressly stating the fuel source or nonpower attributes are not included</p> <p>(c)(i)(B) Except as provided in (c)(iii) of this subsection, a utility may use an unbundled REC for alternative compliance only if the utility demonstrates: The associated electricity was not delivered, reported, or claimed as a zero-emission specified source or assigned the emissions rate of the renewable generating facility under a greenhouse gas (GHG) program.</p> <p>(c)(ii)(A) A utility's demonstration under this section may be met by documentation that the entity providing the unbundled REC: Provides contract, confirmation, or other transaction terms that comply with the requirements of (c)(i)(A) and (B) of this subsection;</p> <p>(c)(ii)(B) A utility's demonstration under this section may be met by documentation that the entity providing the unbundled REC: Was a party to or otherwise has knowledge of the transaction in which the associated electricity was sold or transferred and attests to (c)(i)(A) and (B) of this subsection;</p> <p>(c)(ii)(C) A utility's demonstration under this section may be met by documentation that the entity providing the unbundled REC: Obtained the unbundled REC from an entity that attests that it and all previous owners of the REC transferred the REC using transaction</p>	<u>Section 24</u> Unbundled RECs for alternative compliance

WAC 480-100-650(3)	Report Section
<p>terms complying with the requirements of (c)(ii)(A) or (B) of this subsection.</p> <p>(c)(iii) To claim and retire an unbundled REC for alternative compliance where the Washington-eligible RECs were created by renewable electricity marketed by the Bonneville Power Administration a utility must demonstrate the REC was not associated with electricity from a system sale from the Bonneville Power Administration directly into a state with a GHG program and to an entity regulated by the state greenhouse gas program. The RECs are calculated based on the same vintage year as the year in which the electricity was imported to the state with the greenhouse gas program.</p> <p>(c)(iv) For the purposes of (c) of this subsection, "greenhouse gas program" includes any governmental program outside of Washington that caps or limits greenhouse gas emissions or requires the purchase, surrender, or retirement of greenhouse gas allowances if the scope of the greenhouse gas program includes electricity imported from outside the governmental jurisdiction and does not require the retirement of RECs for such imported electricity.</p>	

1. Previous calendar year coal-fired resources

WAC 480-100-650(3)(a) requires, beginning July 1, 2027, an attestation for the previous calendar year that the utility did not use any coal-fired resource to serve Washington retail electric customer load.

This attestation requirement does not take effect until July 1, 2027; thus, Puget Sound Energy, Inc. (PSE) is not reporting on this element in this 2023 Annual Progress Report.

2. Energy savings

WAC 480-100-650(3)(b) requires the provision of data for conservation achievement in megawatts (MW), first-year megawatt-hour (MWh) savings, and projected cumulative lifetime MWh savings.

Table 3 below provides data on the conservation achievement in MW, first-year MWh savings, and projected cumulative lifetime MWh savings (with a weighted average measure life of 10.29 years) for PSE in calendar year 2022.

Table 3: Conservation achievement, first-year savings and projected cumulative lifetime savings

Energy Savings	Savings
Conservation achievement	37.579 MW
First-year MWh savings	242,997.11 MWh
Projected cumulative lifetime MWh savings	2,500,440.24 MWh

3. Demand response

WAC 480-100-650(3)(c) requires the provision of data for demand response program achievement and demand response capability in MW and MWh.

Throughout 2022 and into 2023, PSE has been implementing phase one of its virtual power plant (VPP), which will allow PSE to dispatch demand response (DR) resources once acquired. In February 2022, PSE issued a Request for Proposal for Distributed Energy Resources (DER), including DR resources, and received a number of proposals in March 2022. PSE is in the process of contracting with multiple vendors to provide the anticipated DR capacity resources. This work is still in progress, and PSE did not have DR programs in place in 2022. Accordingly, PSE has no demand response metrics to report.

4. Renewable resources

WAC 480-100-650(3)(d) requires the provision of data for renewable resource capacity in MW and renewable energy usage in MWh, and as a percentage of electricity supplied by renewable resources.

Table 4 below provides renewable energy usage in MWh and as a percentage of electricity supplied by renewable resources, for PSE for calendar year 2022. Table 4 separates resources into three categories: utility-scale renewable resources, Bonneville Power Administration (BPA) purchases, and voluntary renewable programs.

Table 4: Renewable resources by category in 2022

Program	Renewable Energy Usage (MWh)	Percentage of Electricity Supplied by Renewable Resources
Utility scale	8,698,517	41.9%
BPA purchases	641,418	3.1%
Voluntary renewable programs	850,146	N/A
Total	9,339,935¹	45.0%

¹ Total reflects the sum of utility-scale and BPA purchases and does not include voluntary renewable programs as explained below in Section 4

PSE shows the total capacity and energy for utility-scale renewable resources below in Table 5. This includes PSE-owned and contracted CETA-eligible energy.

Table 5: Renewable resource capacity, renewable energy usage, and electricity supplied by renewable resources

Program	Renewable Resource Capacity (MW)	Renewable Energy Usage (MWh)	Percentage of Electricity Supplied by Renewable Resources
Utility scale	3,548.21	8,698,517	41.9%

PSE purchases system power from BPA, which has reportable renewable energy derived from BPA’s hydro resources. All power sold by BPA is from a pool of resources, which BPA describes as follows:

- The system [BPA] sells from is composed of: an interconnected system of hydroelectric plants known as the Federal Columbia River Power System (FCRPS), the non-federal nuclear power plant Columbia Generating Station, a variety of small non-federal resources (mostly small hydro and wind), and wholesale market purchases.
- Except for an initial, brief period in the late 1930’s and early 1940’s of marketing power produced only by the Bonneville dam, [BPA] has not marketed power generated from an individual project.²

BPA published an annual fuel mix report for calendar year 2022 that identifies the sources of BPA system power in 2022.³ PSE applies the BPA percentage supply from renewable resources (84%) and the percentage supply from nonemitting (11%) to calculate the respective percentages applicable to PSE for this report. Table 6 below provides a calculation of the contribution of BPA’s system power to the percentage of PSE’s electricity supplied by renewable resources.

Table 6: Renewable resource capacity, renewable energy usage, and electricity supplied by renewable resources

Program	Renewable Resource Capacity (MW)	Renewable Energy Usage (MWh)	Percentage of PSE Electricity Supplied by Renewable Resources
BPA System Power	84	641,418	3.1%

Table 7 below identifies PSE’s agreements with BPA in calendar year 2022 and the calculation of renewable energy identified in Table 6.

² Bonneville Power Administration, Why BPA Is Required To Sell From A Pooled System Of Resources, available at <https://www.bpa.gov/-/media/Aep/power/provider-of-choice/bpa-whitepaper-on-system-sales.pdf>.

³ Bonneville Power Administration, BPA Fuel Mix Percent Summary. Calendar Year 2022, available at <https://www.bpa.gov/-/media/Aep/power/fuel-mix/2022-bpa-fuel-mix.pdf> (“BPA 2022 Fuel Mix Report”).

Table 7: Breakdown of BPA purchases for renewable energy in 2022

Purchase Category	Volume (MWh)
Baker Replacement	7,000
Capacity Call Option	430,250
Normal Purchase	376,625
Reserve Sharing	(81)
ICE transactions	(50,200)
Grand Total	763,593
Renewable	641,418 (84%¹)

Under the Clean Energy Transformation Act (CETA), power purchases from a qualifying facility pursuant to the Public Utility Reform Policies Act of 1978⁴ or as part of a voluntary renewable program reduce retail load rather than contribute to meeting CETA goals.⁵ Table 8 below identifies PSE’s voluntary renewable programs and purchases from qualifying facilities for calendar year 2022. As required by CETA, PSE reduced retail loads by the amounts identified in Table 8, and PSE did not include these amounts in the CETA-eligible energy calculation.

Table 8: Voluntary renewable programs renewable resource capacity, renewable energy usage, and electricity supplied by renewable resources

Program	Renewable Resource Capacity (MW)	Renewable Energy Usage (MWh)	Percentage of electricity supplied by renewable resources
Green Direct	286.80	658,439	N/A
Community Solar	9.98	8,783	N/A
Qualifying Facilities	57.10	183,370	N/A

5. Renewable energy credits

WAC 480-100-650(3)(e) requires the provision of data for renewable energy credits (RECs) and the program or obligation for which they were used (e.g., voluntary renewable programs, renewable portfolio standard, clean energy transformation standards).

This section provides information regarding RECs that are available through WREGIS as of the date of the filing of this 2023 Annual Progress Report. It is important to note that PSE continues to work through issues with WREGIS and contracting parties to ensure that PSE can account for all RECs associated with clean energy used to serve customers.

⁴ RCW 19.405.020(36)(a).

⁵ RCW 19.405.020(36)(b).

Table 9: Renewable energy credits and the program for which they were used

Program	Renewable energy credits
Green Direct	719,506
Renewable portfolio standard	3,084,363
Clean energy transformation standards	See Section 6

→ Appendix A provides additional information about RECs for PSE for calendar year 2022.

As mentioned in [Section 4](#), CETA treats power purchases from a qualifying facility pursuant to the Public Utility Reform Policies Act of 1978⁶ or as part of a voluntary renewable program as reducing retail load rather than contributing to meeting CETA goals. Therefore, PSE has excluded RECs generated by qualifying facilities or as part of voluntary renewable programs from the calculation of resources meeting CETA goals.

PSE will retire RECs for compliance with the renewable portfolio standard (RPS) program⁷ for calendar year 2022 in a future docket in 2024. PSE will not retire these RECs until the Closeout Report in calendar year 2024. PSE’s 2022 Annual RPS Report in Docket UE-220405 includes a preliminary list of RECs that PSE will retire for 2022.⁸ [Section 6](#) of this 2023 Annual Progress Report outlines the 2022 Compliance Plan.

The amount of RECs anticipated for compliance with the 2024 RPS Closeout report, is shown in Table 9. This list and the amounts were preliminary at the time of the filing, and subject to change for the Closeout Report in 2024. In future reporting, PSE intends to show retirement of RECs for RPS as verification for use towards both the renewable portfolio standard and the clean energy transformation standards.

6. Retirement of renewable energy credits

WAC 480-100-650(3)(f) requires the provision of data for the verification and documentation of the retirement of RECs for all electricity from renewable resources used to comply with the requirements of RCW 19.405.040, 19.405.050, a specific target, or an interim target, except for electricity purchased from Bonneville Power Administration, which may be used to comply with these requirements without a renewable energy credit until January 1, 2029, as long as the nonpower attributes of the renewable energy are tracked through contract language.

As of the date of this 2023 Annual Progress Report, PSE has not retired any RECs for purposes of CETA compliance. Therefore, PSE currently has no retired RECs to report under WAC 480-100-650(3)(f).

⁶ RCW 19.405.020(36)(a).

⁷ RCW Chapter 19.285.

⁸ Puget Sound Energy, 2022 Annual Renewable Portfolio Standard Report, Docket UE-220405 (July 7, 2022), available at <https://www.utc.wa.gov/casedocket/2022/220405/docsets>.

Table 10 below identifies the MWhs and RECs associated with renewable energy used by PSE to serve retail electric load in calendar year 2022. PSE anticipates retiring RECs to meet its CETA interim target at the end of each four-year Clean Energy Implementation Plan (CEIP) compliance period. Accordingly, PSE anticipates retiring these RECs at the end of 2025 to comply with the interim target for 2025. PSE plans to rely on a mix of existing and new CETA-eligible renewable resources, and the associated bundled RECs, to meet its 2025 interim target.

Table 10 below includes a column titled “REC Equivalent (Exemption).” This column identifies the following renewable resources for which PSE contractually owns the environmental attributes associated with such renewable resources but RECs are not currently available in WREGIS:

- For Powerex and Kerr Dam: The ownership of the environmental attributes associated with this zero-carbon energy directly passes to PSE under contract, and the counterparty does not register RECs in WREGIS. This energy falls within the exception in WAC 194-40-400(2)(b)(ii).
- For Chelan Slice 35: The ownership of the environmental attributes associated with this hydropower directly passes to PSE under contract, and the counterparty does not register RECs in WREGIS. This energy falls within the exception in WAC 194-40-400(2)(b)(ii).
- For Douglas PUD: The ownership of the environmental attributes associated with this renewable resource directly passes to PSE under contract, and the counterparty does not register RECs in WREGIS. This energy falls within the exception in WAC 194-40-400(2)(b)(ii).
- For Upper Baker: PSE directly owns this renewable energy resource and has not sold the environmental attributes or RECs generated by this resource. Accordingly, PSE owns and retains all environmental attributes of the generation from this resource.
- For BPA System Power: As noted in [Section 4](#) and [Section 7](#), PSE has calculated an amount of renewable energy and nonemitting energy from BPA system power based on the BPA fuel mix report for calendar year 2022.
- For EIM Hydro Sold to California: PSE will not claim the RECs or environmental attributes from the energy sold into California through the EIM. The table below reflects this energy being decremented from the CETA eligible energy, and the associated RECs not included in the CETA eligible calculation.

Table 10: CETA RECs generated in 2022

Source	Name	MWh	RECs in WREGIS	REC Equivalent (Exemption)
Carbon Free	Powerex Summer Capacity	488,000		488,000
Carbon Free	Powerex Winter Capacity	488,000		488,000
Hydro	Chelan PUD – RI & RR – Major Contract (Bundled)	2,271,897	2,271,897	
Hydro	Chelan PUD – Slice 35 (Not receiving Recs)	300,215		300,215
Hydro	Douglas PUD – Wells Project	1,315,136		1,315,136

Source	Name	MWh	RECs in WREGIS	REC Equivalent (Exemption)
Hydro	Grant PUD – Priest Rapids Project	464,646	464,650	
Hydro	Kerr Dam – Energy Keeper	350,341		350,341
Hydro	Lower Baker	317,498	317,337	
Hydro	Snoqualmie Falls	173,024	173,009	
Hydro	Upper Baker	268,093		268,093
Hydro	EIM Hydro Sold to California	(245,835)		
Hydro	BPA System Power	725,414		725,414
Hydro	Total	6,916,429	3,226,893	3,935,199
Wind	Avangrid Renewable (Golden Hills) ⁹	408,537	316,787	87,671
Wind	Clearwater Wind	212,170	212,170	
Wind	Hopkins Ridge (W184)	350,738	350,738	
Wind	Klondike Wind Power III	118,007	118,073	
Wind	Lower Snake River ¹⁰	770,634	752,186	
Biomass	Sierra Pacific Industries ¹¹	83,814	82,835	
Wind	Wild Horse (W183) ¹²	563,602	566,487	
Existing Wind / Solar / Biomass	Total	2,507,501	2,399,276	87,671
All Existing	Total	9,423,931	5,626,169	4,022,870

PSE’s annual interim CETA target for calendar year 2022 was 43%. Based on the values in Tables 4 and 10, PSE’s actual percentage of electricity supplied by renewable energy and nonemitting resources was 45.4%. Table 4 provides the overall renewable energy generated which matches the number of RECs accounted for in Table 10 above. This verifies the energy and associated RECs from renewable resources in calendar year 2022.

7. Nonemitting energy

WAC 480-100-650(3)(g) requires the provision of information regarding nonemitting resource capacity in MW, and nonemitting energy usage in MWh and as a percentage of total electricity supplied by nonemitting energy. CETA defines the term “nonemitting electric generation” as follows:

⁹ PSE is still examining inconsistencies in the WREGIS database

¹⁰ Values for Lower Snake River are different due to RECs sold to a third Party

¹¹ PSE is still examining inconsistencies in the WREGIS database

¹² PSE is still examining inconsistencies in the WREGIS database

(a) “Nonemitting electric generation” means electricity from a generating facility or a resource that provides electric energy, capacity, or ancillary services to an electric utility and that does not emit greenhouse gases as a by-product of energy generation.

(b) “Nonemitting electric generation” does not include renewable resources.¹³

In calendar year 2022, PSE purchased system power from BPA under several agreements. BPA’s fuel mix report for calendar year 2022 provides that approximately 11% of BPA’s system power consisted of electricity generated by the Columbia Generating Station.¹⁴ The Columbia Generating Station is a nuclear generator that meets this interpretation of the phrase “nonemitting electric generation.”

Table 11 below provides the nonemitting resource capacity in MW, and nonemitting energy usage in MWh, and as a percentage of total electricity supplied by nonemitting energy.

Table 11: Nonemitting resource capacity, renewable energy usage, and electricity supplied by nonemitting resources

Program	Nonemitting Resource Capacity (MW)	Nonemitting Energy Usage (MWh)	Percentage of Electricity Supplied by Nonemitting Resources
Nonemitting resource (BPA System Power)	11	83,995	0.4%

Table 12: Breakdown of BPA purchases for nonemitting energy in 2022

Purchase Category	Volume (MWh)
Baker Replacement	7,000
Capacity Call Option	430,250
Normal Purchase	376,625
Reserve Sharing	(81)
ICE Transactions	(50,200)
Grand Total	763,593
Nonemitting energy	83,995 (11%)

8. Greenhouse gas content calculation

WAC 480-100-650(3)(h) requires the provision of the greenhouse gas content calculation pursuant to RCW 19.405.070.

¹³ RCW 19.405.020(28).

¹⁴ BPA 2022 Fuel Mix Report, supra note 3.

As discussed in [Section 9](#) of this 2023 Annual Progress Report, the greenhouse gas content calculation for calendar year 2022 is not available as of the date of this 2023 Annual Progress Report due to the annual timing of the Washington Department of Commerce’s preparation of the 2022 Fuel Mix and Greenhouse Gas Emission Report.

PSE will provide the 2022 Greenhouse Gas Content Calculation in PSE’s 2024 Annual Progress Report. PSE filed the 2021 Fuel Mix and Greenhouse Gas Emission Report on March 3, 2023, in Docket UE-230156.¹⁵

9. Fuel mix disclosure report

WAC 480-100-650(3)(i) requires the provision of an electronic link to the most recently filed fuel mix disclosure report as required by RCW 19.29A.140.

The 2022 Fuel Mix and Greenhouse Gas Emission Report for PSE is not available at the time of this filing. The Washington Department of Commerce begins its process for preparing a fuel mix and greenhouse gas emissions report for a calendar year in the second quarter of the following calendar year. PSE files a preliminary draft fuel mix and greenhouse gas emissions report for a calendar year on or by July 1 of the following year. The Washington Department of Commerce reviews the preliminary draft fuel mix and greenhouse gas emissions report by the end of the third quarter of the following year and finalizes by the end of November of the following year. For example, PSE will receive the necessary guidance from the Washington Department of Commerce regarding the fuel mix and greenhouse gas emissions report for calendar year 2022 in the fourth quarter of 2023. PSE will publish data for calendar year 2022 in the fourth quarter of 2023, dependent on the process of the Washington Department of Commerce.

As of the date of this 2023 Annual Progress Report, PSE can only provide an electronic link to the [2021 Fuel Mix and Greenhouse Gas Emission Report](#). PSE will provide an electronic link to the 2022 Fuel Mix and Greenhouse Gas Emissions Report in PSE’s 2024 Annual Progress Report.

10. Greenhouse gas emissions

WAC 480-100-650(3)(j) requires the provision of data regarding total greenhouse gas emissions in metric tons of CO₂e.

As discussed in [Section 9](#), the 2022 Fuel Mix and Greenhouse Gas Emission Report for PSE is not available at the time of this filing. As of the date of this 2023 Annual Progress Report, PSE can only provide an electronic link to the [2021 Fuel Mix and Greenhouse Gas Emission Report](#). Please see cell E12 of the “Report” tab of the 2021 Fuel Mix and Greenhouse Gas Emission Report for the greenhouse gas content of PSE for calendar year 2021.

PSE will provide an electronic link to the 2022 Fuel Mix and Greenhouse Gas Emissions Report in PSE’s 2024 Annual Progress Report.

¹⁵ See Puget Sound Energy, “2021 Fuel Mix and Greenhouse Gas Emission Report,” Docket UE-230156 (Mar 8, 2023), available at <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=3&year=2023&docketNumber=230156>.

11. Ownership of nonpower attributes

WAC 480-100-650(3)(k) requires the demonstration of ownership of nonpower attributes for nonemitting generation using attestations of ownership and transfer by properly authorized representatives of the generating facility, all intermediate owners of the nonemitting electric generation, and an appropriate company executive of the utility.

PSE purchased system power from BPA in calendar year 2022 pursuant to the Day Ahead Notice Capacity & Energy Surplus Sale Agreement between BPA and PSE, dated March 2, 2020 (the “Surplus Sales Agreement”). As discussed in [Section 4](#), BPA’s fuel mix report for calendar year 2022 states that 84% of BPA’s system power consisted of electricity generated by renewable resources. As discussed in [Section 7](#), BPA’s fuel mix report for calendar year 2022 states that 11% of BPA’s system power consisted of electricity generated by nonemitting electric generation. The remaining 5% of BPA’s system power consisted of unspecified power from market purchases.

Section 3(a) of the Surplus Sales Agreement provides that “BPA shall convey to PSE all Low Carbon Attributes and associated reporting rights, as defined in the WSPP Agreement, for all Firm Energy delivered to PSE under this Agreement.” Section 2(h) of the Surplus Sales Agreement defines the term “Low Carbon Attributes” as “environmental attributes consisting of emission reductions, reporting rights and avoided pollutants and carbon dioxide. One megawatt-hour (MWh) of energy generation from the Federal System is associated with one MWh of Low Carbon Attributes.”

➔ Appendix B to this 2023 Annual Progress Report provides a copy of the Day Ahead Notice Capacity & Energy Surplus Sale Agreement between BPA and PSE, dated March 2, 2020.

12. Other information

WAC 480-100-650(3)(l) requires the provision of other information the company agreed to or was ordered to report in the most recently approved CEIP or biennial CEIP update.

The Commission approved PSE’s 2021 CEIP, with conditions, on June 6, 2023 in Order 08 in Docket UE-21079. Although this final order requires PSE to make certain compliance filings in calendar year 2023, it does not require PSE to provide additional information in the 2023 Annual Progress Report.

13. Total retail sales

WAC 480-100-650(4)(a)(i) requires the provision of data regarding total Washington retail sales.

PSE can provide hourly retail data for any customers with an advanced metering infrastructure (AMI) meter, but many of PSE’s customers still have an automated meter reading (AMR) meters. Typically, the configuration of AMR meters does not allow for the capture of hourly data. As part of CETA’s rulemaking process, PSE provided

comments stating that PSE does not have hourly retail sales information available. Specifically, in joint comments submitted in Docket UE-210183, the joint parties, which included PSE, stated that “[t]he Joint Utilities are generally able to provide hourly system loads, measured at the point of injection into the utility system, but do not have hourly retail sales, which are measured at the customer meter.”¹⁶ Because many PSE customers still have AMR meters, PSE cannot provide hourly data regarding retail sales for customers¹⁷. PSE can provide monthly data regarding retail sales.

→ Appendix C to this 2023 Annual Progress Report provides monthly data for retail sales by PSE in calendar year 2022.

14. Retail sales for voluntary renewable programs

WAC 480-100-650(4)(a)(ii) requires the provision of data regarding retail sales for customers participating in a voluntary renewable energy purchase program in alignment with RCW 19.405.020 (36)(b).

As discussed in [Section 13](#), PSE cannot provide hourly data regarding retail sales because many PSE customers still have AMR meters. However, PSE can provide monthly data regarding retail sales.

→ Appendix D to this 2023 Annual Progress Report provides monthly data for retail sales by PSE to retail customers for voluntary renewable programs in calendar year 2022.

15. Total electricity production

WAC 480-100-650(4)(a)(iii) requires the provision of data regarding total electricity production for all renewable and nonemitting generation owned, contracted, or controlled by the utility.

Hourly data for BPA purchases are not included in this Appendix E due to data collection challenges.

→ Appendix E to this 2023 Annual Progress Report provides hourly reporting on total electricity production for renewable and

¹⁶ Correction to Joint Comments, on behalf of Puget Sound Energy, Avista Corporation and PacifiCorp, from Jon Piliaris, Shawn Bonfield and Shelley McCoy, Docket UE-210183 (Nov. 12, 2021), available at www.utc.wa.gov/casedocket/2021/210183/docsets.

¹⁷ PSE filed a petition requesting an exemption from WAC 480-100-560 (4)(a)(i)(ii) and (iv) in Docket UE-210795 on June 26, 2023 available at <https://www.utc.wa.gov/casedocket/2021/210795/docsets>

nonemitting generation owned, contracted, or controlled by PSE for calendar year 2022 by specific resource.

16. Generation from qualifying facilities

WAC 480-100-650(4)(a)(v) requires the provision of data regarding electricity purchased from generation of qualifying facilities as described in RCW 19.405.020 (36)(a).

Appendix F to this 2023 Annual Progress Report provides hourly data for PSE’s purchases from qualifying facilities for calendar year 2022. Please note that there are data points missing in the data for purchases from qualifying facilities, indicated by the symbol “-” in the applicable cell. These missing data points are due to (i) the technology used to capture this data erasing the records for hourly data after a certain period of time or (ii) the inability of the technology to capture this data on a consistent basis.

→ Appendix F to this 2023 Annual Progress Report provides hourly data for PSE’s purchases from qualifying facilities for calendar year 2022.

17. Bundled sales of electricity

WAC 480-100-650(4)(a)(v) requires the provision of data regarding electricity sold or transferred for all bundled sales of electricity from renewable and nonemitting sources.

PSE did not sell bundled electricity from renewable or nonemitting resources in calendar year 2022. Accordingly, PSE has nothing to report in this 2023 Annual Progress Report regarding bundled electricity sold from renewable or nonemitting resources in calendar year 2022.

18. Wholesale market electricity sales

WAC 480-100-650(4)(a)(vi) requires the provision of data regarding electricity sales in which the electricity was sold by that utility in a wholesale market sale without its associated nonpower attributes.

→ Appendix G to this 2023 Annual Progress Report provides data for PSE for calendar year 2022 regarding electricity sales in a wholesale market sale without its associated nonpower attributes.

19. Wholesale market sales in megawatt-hours

WAC 480-100-650(4)(b)(i) requires the provision of data regarding total monthly MWh of sales, purchases, and exchanges by counter party of electricity sales in which the electricity was sold by that utility in a wholesale market sale without its associated nonpower attributes.

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- ➔ Appendix H to this 2023 Annual Progress Report provides data for PSE for calendar year 2022 regarding total monthly MWh of sales, purchases, and exchanges by counter party of electricity sales in which the electricity was sold by that utility in a wholesale market sale without its associated nonpower attributes.
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20. Bundled electricity from renewable or nonemitting generation

WAC 480-100-650(4)(b)(ii) requires the provision of total monthly megawatt-hours of sales, purchases, and exchanges of bundled electricity from renewable or nonemitting generation. For the purposes of this subsection, bundled electricity is electricity that is sold with all of its nonpower attributes in the same transaction.

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- ➔ Appendix I to this 2023 Annual Progress Report provides total monthly megawatt-hours of sales, purchases, and exchanges of bundled electricity from renewable or nonemitting generation for PSE during calendar year 2022.
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21. Coal fueled generation contracts

WAC 480-100-650(4)(b)(iii) requires the provision of power purchase agreements with a term longer than one month that source the electricity from coal-fired resources.

PSE has one power purchase agreement with a term longer than one month that sources the electricity from coal-fired resources – the Coal Transition Power Purchase and Sale Agreement by and between PSE and TransAlta Centralia Generation LLC, dated July 24, 2012.

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- ➔ Appendix J to this 2023 Annual Progress Report provides a copy of the Coal Transition Power Purchase and Sale Agreement by and between PSE and TransAlta Centralia Generation LLC, dated July 24, 2012.
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22. Coal fueled generation contracts, beginning 2026

WAC 480-100-650(4)(b)(iv) requires the provision, beginning January 1, 2026, of all existing or new purchase contracts longer than one month with documentation that none of the electricity delivered is sourced from coal fueled generation.

This requirement does not take effect until January 1, 2026. Accordingly, PSE has nothing to report in this 2023 Annual Progress Report regarding this element.

23. Western Power Pool data

WAC 480-100-650(4)(b)(v) requires the provision of any data provided to the Western Power Pool's Western Resource Adequacy Program (WRAP) or its successor.

As of the date of the filing of this 2023 Annual Progress Report, PSE is not a binding participant in the WRAP. Accordingly, PSE has nothing to report in this 2023 Annual Progress Report regarding data provided to the WRAP.

24. Unbundled RECs for alternative compliance

WAC 480-100-650(4)(c) requires the provision of certain information regarding the use of unbundled RECs for alternative compliance with CETA.

PSE does not plan to use unbundled RECs for alternative compliance with CETA prior to 2030. Accordingly, PSE has nothing to report in this 2023 Annual Progress Report regarding the use of unbundled RECs for alternative compliance with CETA.