

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Application of

PUGET SOUND ENERGY

For an Order Authorizing the Sale of All of
Puget Sound Energy's Interests in Colstrip Unit
4 and Certain of Puget Sound Energy's
Interests in the Colstrip Transmission System

DOCKET UE-200115

EXH. MSG-06

PSE RESPONSE TO NVEC DATA REQUEST NO. 022

**ON BEHALF OF
NW ENERGY COALITION AND
RENEWABLE NORTHWEST**

October 2, 2020

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-200115
Puget Sound Energy
Application Authorizing Sale of PSE Interest in Colstrip Unit 4**

NWEC DATA REQUEST NO. 022:

These questions address PSE's wind and CETA analysis.

- a. Please explain why Montana wind capacity additions were limited to 600 MW in PSE's Draft 2019 SCC IRP analysis.¹
- b. Did that 600 MW cap account for PSE's proposed sale of 185 MW of CTS capacity to NorthWestern Energy?
- c. Is PSE aware of any analysis indicating how the proposed sale of 185 MW of CTS capacity to NorthWestern Energy increases the cost of PSE's compliance with the Washington Clean Energy Transformation Act ("CETA")? If so, please provide that analysis.
- d. Is PSE aware of analysis of what the economically optimal level of Montana wind capacity would have been without the 600 MW cap in PSE's 2019 SCC IRP analysis? If so, please provide that analysis. If not, please confirm that the economically optimal level of Montana wind capacity would have been higher than 600 MW without the cap.

Response:

Puget Sound Energy ("PSE") objects to NWEC Data Request No. 022 on the grounds that it seeks information that is neither relevant to the subject matter involved in this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, PSE provides the following response.

- a. The Montana wind capacity available to PSE is approximately 600 MW, as identified in the 2019 Integrated Resource Plan ("IRP") process, due to transmission capacity available to PSE on the Colstrip Transmission System. The assumption for the 2019 IRP is that when Colstrip Units 3 & 4 retire, that capacity will be available to PSE for other resources in eastern Montana, but there is no guarantee that the total transmission capacity of the Colstrip

¹ *Ibid.*

Transmission System will remain constant with the retirement of Colstrip Units 3 & 4 or that PSE could secure all of the capacity owned by PSE on the Colstrip Transmission System, even if the Colstrip Transmission System remained constant.

- b. No.
- c. No. PSE is not aware of any analysis indicating how the proposed sale of 185 MW of Colstrip Transmission Capacity to NorthWestern Energy increases the cost of PSE's compliance with the Washington Clean Energy Transformation Act.
- d. Given the uncertainty around the availability of additional transmission capacity from Montana, PSE has not performed an analysis of the economically optimal level of Montana wind without the 600 MW of Montana wind capacity available to PSE and identified in the 2019 IRP.