PUGET SOUND ENERGY 2024 ANNUAL CLEAN ENERGY PROGRESS REPORT

Pursuant to RCW 19.405 and WAC 480-100-650

PUGET SOUND ENERGY

Contents

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.	Section 1 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	Section 2 Energy savings
(c) Demand response program achievement and demand response capability in megawatts and megawatt hours.	Section 3 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.	Section 4 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).	Section 5 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.	Section 6 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.	Section 7 Nonemitting energy
(h) The utility's greenhouse gas content calculation pursuant to RCW 19.405.070.	Section 8 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.	Section 9 Fuel mix disclosure report
(j) Total greenhouse gas emissions in metric tons of CO2e.	Section 10 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 company executive of the utility; the utility may not transfer ownership of the nonpower attributes after claiming them in any compliance report.	Section 11 Ownership of nonpower attributes
(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(4)		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 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.	Section 20 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.	Section 21 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.	Section 22 Coal fueled generation contracts, beginning 2026
(b)(v)	Any data provided to the Western power pool's resource adequacy program or its successor.	Section 23 Western Power Pool data
(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	Section 24 Unbundled RECs for alternative compliance
(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,	

WAC 480-100-650(4)		Report section
	or claimed as a zero-emission specified source or assigned the emissions rate of the renewable generating facility under a greenhouse gas (GHG) program.	
(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;	
(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;	
(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 terms complying with the requirements of (c)(ii)(A) or (B) of this subsection.	
(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.	
(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.	

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 2024 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 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 8 years) for PSE in calendar year 2023.

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

Energy savings	Savings
Conservation achievement	38.3 MW
First-year MWh savings	258,108 MWh
Projected cumulative lifetime MWh savings	2,959,344 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.

Table 4 provides 2023 data on the two demand response (DR) events called by PSE in 2023; one event was called during the summer season on Aug. 15, 2023 and one during the winter season on Dec. 22, 2023. The MWh results represent four total hours of events called in 2023, two hours on each event day. The Aug. 15, 2023 event dispatched Flex Events, PSE's opt-out non-incentivized behavioral demand response (BDR) program. The Dec. 22, 2023 event again dispatched the Flex Events program but also included PSE's Flex Rewards (incentivized BDR), and Flex Smart Thermostat (Automated DR) programs.

Currently PSE receives forecasts for projected MW load shed of all programs ahead of each event provided by our vendors. Within two weeks after the event, PSE receives actuals on event performance from each vendor to determine achievement and capability, shown in Table 4 in MWh and MW.

Past events, and their associated load shed (MWs) actuals, inform what our portfolio is capable of achieving when called upon in a demand response event on a seasonal basis. The MWh figures in Table 4 reflect energy saved across the full event window, while the MW figures reflect the peak interval curtailment reached during an event.

Table 4: Demand response program capability and achievement in MW and MWh

Season	MWh	MW
Summer (8/15/23)	12.2 MWh	7.2 MW
Winter (12/22/23)	48.3 MWh	24.7 MW

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 MW and as a percentage of electricity supplied by renewable resources.

Table 5 provides renewable energy usage in MWh and as a percentage of electricity supplied by renewable resources for PSE for calendar year 2023. Table 5 separates resources into three categories: utility-scale renewable resources, Bonneville Power Administration (BPA) purchases, and load reducing renewable programs.

Table 5: Renewable resources by category in 2023

Program	Renewable energy usage (MWh)	Percentage of electricity supplied by renewable resources
Utility scale	9,132,926	45.7%
BPA purchases	378,504	1.9%
Load reducing renewable programs	1,236,606	N/A
Total	**9,511,430***	**47.7%**

* Total reflects the sum of utility-scale and BPA purchases and does not include load reducing renewable programs as explained in Section 4.

PSE shows the total capacity and energy for utility-scale renewable resources in Table 6. This includes PSE-owned and contracted CETA-eligible energy.

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 electricity supplied by renewable resources
Utility scale	3,565.2	9,132,926	45.7 %

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.[1]

BPA published an annual fuel mix report for calendar year 2023 that identifies the sources of BPA system power in 2023. PSE applies the BPA percentage supply from renewable resources (78%) and the percentage supply from nonemitting resources (11.3%) to calculate the respective percentages applicable to PSE for this report. Table 7 provides a calculation of the contribution of BPA's system power to the percentage of PSE's electricity supplied by renewable resources.

[1] 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.

Table 7: 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	78	378,504	1.9%

Table 8 identifies PSE's agreements with BPA in calendar year 2023 and the calculation of renewable energy identified in Table 6.

Table 8: Breakdown of BPA purchases for renewable energy in 2023

Purchase category	Volume (MWh)
BPA purchases total	485,261
Renewable	378,504 (78%[2])

Under the Clean Energy Transformation Act (CETA), power purchases from a qualifying facility pursuant to the Public Utility Reform Policies Act of 1978[3] or as part of a voluntary renewable program reduce retail load rather than contribute to meeting CETA goals.[4] Table 9 identifies PSE's load reducing renewable programs including voluntary renewable programs and purchases from qualifying facilities for calendar year 2023. As required by CETA, PSE reduced retail loads by the amounts identified in Table 9, and PSE did not include these amounts in the CETA-eligible energy calculation.

Table 9: Load reducing renewable program 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	286.8	706,129	N/A
Community Solar	15.8	33,315	N/A
PURPA (including Qualifying Facilities and some Green Power projects)	183.3	497,161	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 program, renewable portfolio standard, clean energy transformation standards).

[2] Bonneville Power Administration, BPA Fuel Mix Percent Summary. Calendar Year 2023, available at https://www.bpa.gov/-/media/Aep/power/fuel-mix/2023-bpa-fuel-mix.pdf ("BPA 2023 Fuel Mix Report").

[3] RCW 19.405.020(36)(a)

[4] RCW 19.405.020(36)(b)

This section provides information regarding RECs that are available through WREGIS as of the date of the filing of this 2024 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.

Table 10: Renewable energy credits and the program for which they were used

Program	Renewable energy credits
Voluntary renewable programs (including Green Direct, Solar Choice, Community Solar, Qualifying Facilities and small Green Power projects)	791,970
Renewable portfolio standard	3,198,752
Clean energy transformation standards	See Section 6

➔ Appendix A provides additional information about RECs for PSE's voluntary renewable programs for calendar year 2023.

As mentioned in Section 4, CETA treats power purchases from a qualifying facility pursuant to the Public Utility Reform Policies Act of 1978[5] 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) program[6] for calendar year 2023 in a future docket in 2025. PSE will not retire these RECs until the Closeout Report in calendar year 2025. PSE's 2023 Annual RPS Report in Docket UE-230413 includes a preliminary list of RECs that PSE plans to retire for 2023.[7] PSE's 2024 Annual RPS Report in Docket UE-240411 includes the amount of energy generated in 2023 forecasted to be retired for RPS in the 2025 RPS Closeout Report.[8] These values are part of the total shown in Section 6 of this 2024 Annual Progress Report, which outlines the 2023 Compliance Plan from Docket UE-230413.

The amount of RECs anticipated for compliance with the 2025 RPS Closeout Report is shown in Table 10. This list and the amounts were preliminary at the time of the filing, and subject to change for the Closeout Report in 2025. 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 Act standards.

5 RCW 19.405.020(36)(a)

6 RCW Chapter 19.285

7 Puget Sound Energy, 2023 Annual Renewable Portfolio Standard Report, Docket UE-230413, available at https://www.utc.wa.gov/casedocket/2023/230413/docsets. 230413-PSE-RPS-Report-(06-01-2023).

8 Puget Sound Energy, 2024 Annual Renewable Portfolio Standard Report, Docket UE-240411, available at https://www.utc.wa.gov/casedocket/2024/240411/docsets. 240411-PSE-RPS-Attach-3-(05-31-2024).

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, RCW 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 2024 Annual Progress Report, PSE has only retired RECs for RPS purposes for the year 2022.[9] PSE has not retired any other RECs for purposes of the full 2022-2025 Clean Energy Implementation Plan (CEIP) compliance period. PSE will report on all retired RECs for the 2022-2025 CEIP compliance period in the 2026 clean energy compliance report, and currently has no retired RECs to report under WAC 480-100-650(3)(f).

Table 11 identifies the MWhs and RECs associated with renewable energy used by PSE to serve retail electric load in calendar year 2023. PSE anticipates retiring RECs and demonstrating the retirement of RECs to meet its CETA interim target at the end of each four-year CEIP compliance period. PSE plans to rely on a mix of existing and new CETA-eligible renewable resources, and the associated bundled RECs when available, to meet the four-year interim target.

Table 11 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:

- 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).
- Douglas PUD: The ownership of the environmental attributes associated with this hydropower directly passes to PSE under contract, and the counterparty does not register all RECs in WREGIS. This energy falls within the exception in WAC 194-40-400(2)(b)(ii).
- 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.
- 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 2023.
- EIM Hydro Sold to California: PSE will not claim the RECs or environmental attributes from the energy sold into California through the EIM. Table 11 reflects this energy being decremented

[9] Puget Sound Energy, 2022 Annual Renewable Portfolio Standard Report, Docket UE-220405, available at https://www.utc.wa.gov/casedocket/2022/220405/docsets. Verification for the retirement of these RECs is shown in Attachment 3 of this Docket.

from the CETA eligible energy, and the associated RECs not included in the CETA eligible calculation.

- Other Schedule C-SS: The ownership of the environmental attributes associated with this hydropower directly passes to PSE under contract, by virtue of the Specified Source deal. If RECs are not created in WREGIS, this energy falls within the exception in WAC 194-40-400(2)(b)(ii).

Table 11: CETA RECs generated in 2023

Source	Name	MWh	Renewable energy credits in WREGIS	REC equivalent (exemption)
Carbon free	Powerex Capacity	1,696,000		1,696,000
Hydro	Chelan PUD – RI &* RR – major contract	1,964,636	1,753,949	210,687
Hydro	Douglas PUD – Wells Project*	997,571	844,506	153,065
Hydro	Grant PUD – Priest Rapids Project	333,842	333,842	
Hydro	Kerr Dam – Energy Keeper	350,345		350,345
Hydro	Lower Baker*	262,830	254,601	8,307
Hydro	Snoqualmie Falls*	166,238	160,438	5,392
Hydro	Upper Baker*	270,839	230,784	39,391
Hydro	EIM hydro sold to California	(643,031)		(643,031)
Hydro	BPA power system	433,338		433,338
Hydro	Other Schedule C-SS	28,400		28,400
Hydro	**Total**	**5,861,008**	**3,578,120**	**2,281,894**
Wind	Avangrid renewable (Golden Hills)*	597,384	597,384	
Wind	Clearwater Wind*	1,318,306	948,908	369,337
Wind	Hopkins Ridge	328,737	328,737	
Wind	Klondike Wind Power III	115,990	115,954	
Wind	Lower Snake River**	695,913	692,991	
Biomass	Sierra Pacific Industries*	134,938	133,411	
Wind	Wild Horse *	513,988	513,989	
Existing wind / solar / biomass	**Total**	**3,705,256**	**3,331,374**	**369,337**
All existing	**Total**	**9,566,264**	**6,909,494**	**2,651,231**

* PSE is still examining inconsistencies in the WREGIS database described in Section 5.

** Values for Lower Snake River are different due to losses.

PSE's annual interim CETA target for calendar year 2023 was 53%. Based on the values in Tables 5 and 11, PSE's actual percentage of electricity supplied by renewable energy and nonemitting resources

was 48% in 2023. Table 5 and Table 12 provides the overall renewable and nonemitting energy generated, which matches the number of RECs accounted for in Table 11 above. This verifies the energy and associated RECs from renewable resources in calendar year 2023.

PSE's actual percentage of electricity supplied by renewable energy and nonemitting resources in 2023 was lower than its annual target due to low hydro and wind generation in atypical weather conditions (i.e., a very warm summer and dry winter), particularly in late 2023. CETA-eligible energy generation was 18% lower than the P50 forecast.

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:

> (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.[10]

In calendar year 2023, PSE purchased system power from BPA under several agreements. BPA's fuel mix report for calendar year 2023 provides that approximately 11.3% of BPA's system power consisted of electricity generated by the Columbia Generating Station.[11] The Columbia Generating Station is a nuclear generator that meets the definition of "nonemitting electric generation."

Table 12 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 12: 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)	11.3	54,834	0.3%

Table 13: Breakdown of BPA purchases for nonemitting energy in 2023

Purchase category	Volume (MWh)
BPA purchases total	**485,261**
Nonemitting energy	**54,834 (11.3%)**

[10] RCW 19.405.020(28)

[11] BPA 2023 Fuel Mix Report, supra note 2.

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.

On March 14, 2024, Governor Inslee signed House Bill 1955 into law, which repeals the greenhouse gas reporting requirements under RCW 19.405.070, effective June 6, 2024. Accordingly, electric utilities need not calculate or report greenhouse gas content calculations under the Clean Energy Transformation Act.

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 2023 Fuel Mix and Greenhouse Gas Emission Report for PSE is not available at the time of this filing. The Washington Department of Commerce (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. 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 Commerce regarding the fuel mix and greenhouse gas emissions report for calendar year 2023 in the fourth quarter of 2024. PSE will publish data for calendar year 2023 in the fourth quarter of 2024, dependent on the process of Commerce.

As of the date of this 2024 Annual Progress Report, PSE can only provide an electronic link to the 2022 Fuel Mix and Greenhouse Gas Emission Report. PSE will provide an electronic link to the 2023 Fuel Mix and Greenhouse Gas Emissions Report in PSE's 2025 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 2023 Fuel Mix and Greenhouse Gas Emission Report for PSE is not available at the time of this filing. As of the date of this 2024 Annual Progress Report, PSE can only provide an electronic link to the 2022 Fuel Mix and Greenhouse Gas Emission Report. Please see "Utility Emissions Table" tab of the 2022 Fuel Mix and Greenhouse Gas Emission Report for the greenhouse gas content of PSE for calendar year 2022.

PSE will provide an electronic link to the 2023 Fuel Mix and Greenhouse Gas Emissions Report in PSE's 2025 Annual Progress Report.

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 2023 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 2023 states that 78% 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 2023 states that 11.3% of BPA's system power consisted of electricity generated by nonemitting electric generation. The remaining 10.7% 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 2024 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 2023 Biennial CEIP Update, with conditions, on March 25, 2024, in Order 12 in Docket UE-210795. This final order does not require PSE to provide additional information in the 2024 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 is providing hourly retail data for 98% of its customers with an advanced metering infrastructure (AMI) meter. The remaining 2% of PSE customers have opted out of the AMI meters (approx. 2000). These opt out meters are only read for billing purposes and do not provide the detail required for hourly usage.

➔ Appendix C (CONFIDENTIAL) to this 2024 Annual Progress Report provides hourly calendar year 2023.

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).

PSE is providing hourly and monthly data for our community solar program and monthly data for each renewable program. All renewable programs except for community solar have Automated Meter Reading (AMR) meters and PSE is unable to collect hourly data from AMR meters.

➔ Appendix D (CONFIDENTIAL) to this 2024 Annual Progress Report provides monthly data for retail sales by PSE to retail customers for voluntary renewable programs in calendar year 2023.

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 was not included in the 2023 Annual Progress Report due to data collection challenges. This 2024 Annual Progress Report now includes hourly data for BPA purchases and sales.

➔ Appendix E (CONFIDENTIAL) to this 2024 Annual Progress Report provides hourly reporting on total electricity production for renewable and

nonemitting generation owned, contracted, or controlled by PSE for calendar year 2023 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).

The 2023 Annual Progress Report was missing hourly data from three qualifying facilities due to the data collection system being unable to retain data past 45 days. PSE has updated its system to retain data for the necessary reporting requirements. In this report we provide hourly data for all of PSE's qualifying facilities.

➔ Appendix F (CONFIDENTIAL) to this 2024 Annual Progress Report provides hourly data for PSE's purchases from qualifying facilities for calendar year 2023.

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 2023. Accordingly, PSE has nothing to report in this 2024 Annual Progress Report regarding bundled electricity sold from renewable or nonemitting resources in calendar year 2023.

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 (CONFIDENTIAL) to this 2024 Annual Progress Report provides data for PSE for calendar year 2023 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.

➔ Appendix H (CONFIDENTIAL) to this 2024 Annual Progress Report provides data for PSE for calendar year 2023 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.

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 its nonpower attributes in the same transaction.

➔ Appendix I (CONFIDENTIAL) to this 2024 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 2023.

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.

As of the date of the filing of this 2024 Annual Progress Report, PSE does not have any active coal fueled generation contracts.

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 Jan. 1, 2026. Accordingly, PSE has nothing to report in this 2024 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.

Appendix J (CONFIDENTIAL) to this 2024 Annual Progress Report includes data provided to the Western Power Pool's Summer Western Resource Adequacy Program.

Appendix K (CONFIDENTIAL) to this 2024 Annual Progress Report includes data provided to the Western Power Pool's Winter Western Resource Adequacy Program.

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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 2024 Annual Progress Report regarding the use of unbundled RECs for alternative compliance with CETA.