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November 6, 2013

Mr. Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Subject: Docket No. UE-131883

Commission Investigation of the Costs and Benefits of Distributed Generation and the Effect of Distributed Generation on Utility Provision of

Electric Service

Dear Mr. Danner:

In response to the Commission seeking written comments on issues related to the Costs and Benefits of Distributed Generation and the Effect of Distributed Generation on Utility Provision of Electric Service in Docket UE-131883, Puget Sound Energy, Inc. ("PSE" or the "Company") offers the following comments regarding the questions the Commission posed in its opportunity to file written reply comments on October 15. In its Notice of Opportunity to File Written Comments, the Commission did not define Distributed Generation and so for purposes of answering these questions, PSE will use the definition provided in RCW 19.285.030(11): "Distributed generation" means an eligible renewable resource where the generation facility or any integrated cluster of such facilities has a generating capacity of not more than five megawatts. Net Metering Customer is not a defined term in PSE's Electric Tariff Book WN U-60, but Customer-Generator is defined in PSE's Electric Schedule 150 as: Customer-Generator – a Customer who operates a Generating Facility for use in Net Metering System.

1. The total number of net metering customers, the total capacity of installed generation of the net metering customers as of October 31, 2013, on the company's system, and the company's net metering cap as of January 1, 2014.

System Type	Number of Systems	Average Capacity per System Type (kW)	Sum of all Systems by <u>Type (kW)</u>
Hybrid; Solar/Wind	12	8.39	100.74
Micro hydro	5	4.42	22.10
Solar array	1,758	5.66	9,950.23
Wind turbine	35	3.11	108.70
Total Number of Systems	1,810	Total Capacity of All Syst	tems 10,181.77

Currently the Company's net metering cap is 11.2 MW and will increase to 22.4 MW on January 1, 2014.

2. A description of DG interconnected to the company's distribution system that is not enrolled in the net metering program, including the aggregated capacity for each generation type as of October 31, 2013.

A general description of Distributed Generation interconnected to the Company's distribution system that is *not* currently enrolled in PSE's Net Metering program (Schedule 150) by aggregated capacity for each type of generation is summarized as follows:

Generation Type	Aggregated Capacity					
Biomass (Dairy)	4.172 MW					
Landfill gas	9.380 MW					
Hydro	8.820 MW					
Solar	0.456 MW					
Wind	5.753 MW					

3. <u>Aggregated on a company-wide basis, the number of net metering credits</u> that expired under RCW 80.60.030(5), on April 30 in 2011 and 2012, and the aggregate number of net metering credits awarded per month in 2011 and 2012.

Net metering credits expired on April 30th, 2011: 26,579. Net metering credits expired on April 30th, 2012: 54,159.

Net metering credits (kWH) awarded per month in 2011 and 2012:

Year	Jan.	Feb.	Mar.	Apr.	May	June	Jul.	Aug.	Sep.	Oct.	Nov.	Dec.
2012	25,105	44,109	89,092	173,448	264,965	350,789	315,256	435,627	340,365	373,798	97,434	54,964
2011	21,763	24,637	62,365	97,653	161,248	224,702	198,689	285,386	262,178	169,008	88,497	54,407

PSE appreciates the opportunity to present these comments. Please direct any questions regarding these comments to Eric Englert at (425) 456-2312 or the undersigned at (425) 456-2110.

Sincerely,

/s/ Kenneth S. Johnson

Ken Johnson Director, State Regulatory Affairs