



October 22, 2021

Washington Utilities and Transportation Commission

Submitted electronically

RE: Puget Sound Energy Comment - Docket Number UE-210220

To Whom it May Concern:

Renewable Energy Group, Inc. ("REG") appreciates the opportunity to comment on Puget Sound Energy's ("PSE") ELCC methodology. REG has invested substantial effort into supporting several bidder's proposals submitted for the 2021 RFP based on the premise that sustained, long-duration firm capacity is essential for this unique region. We believe that solutions exist to meet PSE's peaking capacity requirements, and that biodiesel is a great fit for meeting PSE's firm capacity and Clean Energy Transformation Act ("CETA") needs. The ability to utilize a local, readily available, storable, and energy-dense renewable fuel like biodiesel will ensure PSE has the electricity it needs during peak usage times and during extreme weather conditions. This is firmly in Washington's best interest and aligns directly with the intent of CETA.

REG is leading the energy and transportation industries' transition to sustainability by transforming renewable resources into high-quality, sustainable fuels. Renewable Energy Group is an international producer of sustainable fuels that significantly lower greenhouse gas emissions to immediately reduce carbon impact. **REG's Grays Harbor facility, located in Hoquiam, Washington, is the largest biodiesel plant on the West Coast** and an immediate and reliable source of biodiesel for PSE. Our biofuel production process converts waste fats and oils and vegetable oils into high quality renewable fuels to meet the growing global demand for cleaner, lower carbon products. The use of biodiesel and renewable diesel in a conventional diesel engine reduces fossil carbon Scope 1 emissions by at least 94%.

REG believes PSE's analysis appears reasonable given the unique regional generation mix and reveals the right fit for their customers. Biodiesel powered generation offers an excellent solution for providing infrequent but long-duration peaking capacity. Recent extreme and cold weather in Texas and Europe demonstrate the need to prepare for all possible scenarios despite a warming climate. The proposals that REG supported show that thousands of megawatt-hours can be stored in the form of biodiesel onsite with a minimal footprint, low GHG emissions, and at low cost. If even longer duration is required, fuel can be easily refilled given the significant amount of local production capacity and the logistics present to ensure timely delivery.

Biodiesel is renewable, biodegradable, non-toxic, and because it is an oxygenated fuel combusts more thoroughly than conventional petroleum diesel. It is comparable in transporting and handling to vegetable oil and as mentioned before, reduces Scope 1 emissions by at least 94%

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from fossil diesel. Utilizing this energy dense, low cost, storable, and clean emitting fuel for peak power demand is the best choice to power Washington.

Thank you for the opportunity to present our comments.

Respectfully,

A handwritten signature in black ink, appearing to read "KH", is positioned below the word "Respectfully,".

Kent Hartwig, Director, Corporate Affairs and Development
Renewable Energy Group