

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the matter of

Puget Sound Energy’s Draft 2021
Request for Proposals for All Sources

DOCKET NO. UE-210220

NORTHWEST & INTERMOUNTAIN
POWER PRODUCERS COALITION
COMMENTS ON PUGET SOUND
ENERGY’S ELCC ESTIMATES AND
PROPOSED USE

Pursuant to Order No. 01, the Northwest & Intermountain Power Producers Coalition (“NIPPC”) provides these comments on Puget Sound Energy’s (“PSE’s”) Effective Load Carrying Capability (“ELCC”) estimates and the proposed use of these estimates in its All-Source Request for Proposals (“RFP”). NIPPC previously submitted comments expressing concerns with PSE’s ELCC estimates, and the workshop and subsequent consultant reports have not reassured NIPPC otherwise.¹ NIPPC notes that the ELCC values from PSE’s “temperature sensitivity” for some solar resources in 2031 are more than ten times larger in 2031 than the base scenario for those same resources.² Similarly, the ELCC values from PSE’s “temperature sensitivity” for solar-plus-storage and stand-alone storage resources in 2031 are at least two to three times larger in 2031 than the base scenario for those resources.³ This large discrepancy between the modeled ELCC values suggests that it would be a mistake to stay committed to an unadjusted base scenario for all the modeled resources. PSE should propose and adopt an alternative base value for the solar, solar-plus-storage, and stand-alone storage resources whose numbers

¹ NIPPC’s Comments at 9-11 (May 17, 2021); NIPPC’s Comments on Revised RFP at 8 (June 10, 2021).

² See PSE 2021 IRP at 7-47.

³ See PSE 2021 IRP at 7-47.

appear to be incorrect. NIPPC is not certain whether the ELCC values for any other resource type are correct or incorrect and therefore is not recommending changes to any other ELCC values for PSE's RFP except solar, solar-plus-storage, and stand-alone storage.

Fundamentally, NIPPC is concerned that PSE's proposed ELCC values fail to adequately account for its present and future needs, particularly considering the anticipated changes (and risks) associated with climate change and the resulting seasonal shifts in load. The Clean Energy Transformation Act ("CETA") recognizes that "Washington must address the impacts of climate change," and electric utilities must take action to address and plan for a transformed electricity system.⁴ PSE's RFP relies upon 88 years of historic weather data without appropriately adjusting for the future climate.⁵ This baseline is not representative of the next 20-40 years, during the useful life of assets procured in PSE's RFP.

PSE's system is changing. Heating Degree Days are decreasing, and Cooling Degree Days are increasing.⁶ PSE should recognize that its system may be transforming into a dual peaking system. Given this, the proposed base annual ELCC values for some resources might not be reflective of PSE's future system needs. Instead, in addition to an alternative base ELCC value for some resources, the ELCC values in PSE's RFP should be differentiated between summer and winter to account for the potential seasonal load changes.

⁴ RCW 19.405.010; *see also* RCW 19.405.060.

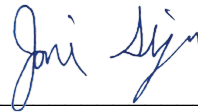
⁵ *E.g.*, PSE 2021 RFP Workshop: Resource Adequacy and ELCC at 8.

⁶ PSE 2021 IRP at 6-35 & 6-36.

In light of the above, NIPPC suggests that the Itron calculated ELCC values for solar, solar-plus-storage, and stand-alone storage resources should be used as the baseline ELCC values rather than solely for a sensitivity analysis. NIPPC does not recommend changes to any other ELCC values at this time.

Dated this 22nd day of October 2021.

Respectfully submitted,



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