

Agenda Date: August 7, 2025
Item Numbers: E5, E2, and E4

Dockets: **UE-250419, UE-250401, UE-250415**

Companies: PacifiCorp d/b/a Pacific Power & Light Company
Puget Sound Energy
Avista Corporation d/b/a Avista Utilities

Staff: Paul Koenig, Regulatory Analyst
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Recommendation

Issue an Order in Docket UE-250419:

1. The 2025 renewable energy target for PacifiCorp d/b/a Pacific Power & Light Company is 618,337 megawatt-hours (MWh);
2. PacifiCorp has demonstrated that, by January 1, 2025, it acquired 1,027,277 MWh of eligible renewable resources, a subset of which will be used for compliance purposes sufficient to supply 15 percent of its load for 2025; and
3. PacifiCorp has complied with the June 1, 2025, reporting requirements pursuant to WAC 480-109-210.

Issue an Order in Docket UE-250401 finding:

1. The 2025 renewable energy target for Puget Sound Energy is 3,174,553 MWh;
2. PSE has demonstrated that, by January 1, 2025, it acquired 7,136,832 MWh of eligible renewable resources, a subset of which will be used for compliance purposes sufficient to supply 15 percent of its load for 2025; and
3. PSE has complied with the June 1, 2025, reporting requirements pursuant to WAC 480-109-210.

Issue an Order in Docket UE-250415 finding:

1. The 2025 renewable energy target for Avista Corporation d/b/a Avista Utilities is 871,498 MWh.
2. Avista has demonstrated that, by January 1, 2025, it acquired 1,611,764 MWh of eligible renewable resources sufficient to supply 15 percent of its load for 2025; and
3. Avista has complied with the June 1, 2025, reporting requirements pursuant to WAC 480-109-210.

Discussion

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company), Puget Sound Energy(PSE or Company), and Avista Corporation d/b/a Avista Utilities(Avista or Company) each filed with the Washington Utilities and Transportation Commission (Commission) an annual renewable portfolio standard (RPS) report on or before June 1, 2025. Commission Staff (Staff) summarizes the companies' incremental costs Table 1 below.

Table 1: Investor-Owned Utilities' Reported Incremental Cost Percentages

	2025 RPS Report	
	<i>Required Eligible Renewable Resources</i>	<i>All Eligible Renewable Resources</i>
PacifiCorp	(4.70) %	(4.70) %
PSE	0.79%	1.40%
Avista	(0.11) %	0.04 %

Similar to the 2024 RPS report, Avista and PacifiCorp both report negative incremental costs for Required Eligible Renewable Resources in 2025, suggesting that eligible renewables were more affordable than the lowest-reasonable-cost, noneligible resources available to the utilities at the time of the eligible resource's acquisition.

PacifiCorp

On May 30, 2025, PacifiCorp filed its 2025 Annual RPS Report. After meeting with Commission Staff, it was discovered that PacifiCorp had a few typographical errors in the narrative. PacifiCorp re-filed to address these issues on July 22, 2025. These corrections are minor and did not affect Staff's determination.

Table 2 summarizes PacifiCorp's 2025 target and the total amount of renewable resources the Company had acquired by January 1, 2025, illustrating the Company's overall compliance position:

Table 2: PacifiCorp's 2025 Renewable Resource Target and Compliance Plan

2025 Target (MWh)	Hydro	Solar	Wind	Geothermal	Total Eligible Resources (MWh)
	RPS Compliance Resources (MWh)				
618,337	1,489	84,971	921,387	19,430	1,027,277

Based on the information that PacifiCorp provided in its initial 2025 report and subsequent re-filing, Staff believes that the Company has correctly calculated its 2025 RPS target, has acquired sufficient resources to meet that target, and has met the reporting requirements of WAC 480-109-210.

Puget Sound Energy

On May 30, 2025, PSE filed its 2025 Annual Renewable Portfolio Standard Report. Table 3 summarizes PSE’s 2025 target and the total amount of renewable resources the Company had acquired by January 1, 2025, illustrating the Company’s overall compliance position:

Table 3: PSE’s 2025 Renewable Resource Target and Compliance Plan

2025 Target (MWh)	Hydro	Wind	Biomass	Total Eligible Resources (MWh)
	RPS Compliance Resources (MWh)			
3,174,553	113,354	6,884,099	139,379	7,136,832

PSE also seeks Commission certification of the Simcoe Solar, Orchard Ranch Solar, Mt. Home Solar 1, and Sierra Pacific Burlington Onsite Load facilities as Energy Independence Act (EIA) qualifying resources. Based on the information that PSE provided in its 2025 report, Staff believes that the Company has correctly calculated its 2025 RPS target, has acquired sufficient resources to meet that target, has provided documentation to justify additional facilities as EIA qualifying resources, and has met the reporting requirements of WAC 480-109-210.

Microsoft 2025 Renewable Portfolio Standard Report (Docket UE-161123)

The special contract between PSE and Microsoft went into effect on April 1, 2019, and PSE filed Microsoft’s annual RPS report (Microsoft Report) with the Commission on June 24, 2025. The settlement stipulation from Docket UE-161123 requires that, beginning in 2021, Microsoft must meet the higher of either 40 percent of its total load, or the percentage specified in RCW 19.285.040(2) (as amended or supplemented) and applicable to PSE.¹ Furthermore, the settlement stipulation provides that Microsoft “will require all its suppliers to provide carbon-free power from identified generating resources.”² Microsoft’s RPS report is included within Staff’s comments addressing PSE’s 2025 RPS report because the Microsoft report is a PSE compliance filing.

The requirements for Microsoft’s annual RPS reporting are similar to the electric IOU requirements as set forth in the EIA, with one important distinction: Microsoft does not need to furnish incremental cost calculations of the eligible resources comprising the company’s portfolio. However, Microsoft’s special contract with PSE does include a carbon-free power supplier disclosure provision not applicable to the electric IOUs. In 2020, Staff, PSE, and the Microsoft RPS team discussed how best to address the carbon-free power supplier disclosure

¹ The annual targets specified in RCW 19.285.040(2) increased to 15 percent starting in 2020. A 40 percent share of Microsoft’s total load is the higher of the two percentages and therefore the required target.

² See Docket UE-161123, Settlement Stipulation and Agreement, ¶ 13 (Apr. 11, 2017).

provision. The Microsoft RPS team agreed to document its carbon-free power supplier requirement as an additional section within the company's annual RPS report.

For the 2025 Microsoft Report, Staff finds the Microsoft report consistent with the carbon-free power supplier compliance requirements laid out in Order 06 in Docket UE-161123, the corresponding Settlement Agreement, and special contract. Staff believes PSE has complied with its 2025 RPS requirements.

Avista

On May 30, 2025, Avista filed its 2025 Annual RPS Report. Table 4 summarizes Avista's 2025 target and the total amount of renewable resources the Company had acquired by January 1, 2025, illustrating the Company's overall compliance position:

Table 4: Avista's 2025 Renewable Resource Target and Compliance Plan

2025 Target (MWh)	Hydro	Solar	Wind	Biomass	Total Eligible Resources (MWh)
	RPS Compliance Resources (MWh)				
871,498	151,541	1,010	436,436	282,511	1,611,764

Avista also seeks Commission certification of the Clearwater Wind Project as an EIA qualifying resource per RCW 19.285.030(21)(b) and WAC 480-109-060(32)(b). Based on the information that Avista provided in its 2025 report, Staff believes that the Company has correctly calculated its 2025 RPS target, has acquired sufficient resources to meet that target, has provided documentation to justify an additional facility as an EIA qualifying resource, and has met the reporting requirements of WAC 480-109-210.

Comments

No public comments were submitted on any of the electric investor-owned utilities' 2025 Annual RPS Reports.

Conclusion

Issue an Order for each company as described in the recommendations section of this memo.