

**Exhibit A to the
Petition of Puget Sound Energy, Inc. for
an Emissions Performance Determination**

Supporting Documents as Required by WAC 480-100-415

1. The electrical company's most recent integrated resource plan.

Enclosed as Exhibit D to the Petition are two discs containing an electronic copy of PSE's most recent integrated resource plan ("IRP").

2. A description of how the proposed electric generation resource meets the resource need, resource investment strategies and other factors identified in the integrated resource plan.

A complete discussion of how electric generation facilities such as the Ferndale Cogeneration Station facility meet PSE's resource need can be found in the attached IRP. For convenience, excerpts from the IRP addressing this requirement are provided below:

From Chapter 1: Executive Summary of the 2011 IRP:

Electric Plan Portfolio

Figure 1-4 summarizes the electric resource plan, in terms of peak hour capacity. This plan is the "integrated resource planning solution." It reflects the lowest reasonable cost portfolio of resources that meets the projected capacity, energy, and renewable resource needs described above. Except for demand-side resources, which significantly reduce risk, most of the other resources show the same risk profile.

(Exh. D, page 10)

Electric Peak Hour Capacity Need.

Notwithstanding the regional surplus of energy the company's electric resource outlook indicates the need for an additional 917 MW of peak hour capacity by 2012, 1,478 MW by 2016, and 2,595 MW by 2020. This includes the resources required to meet peak hour customer demand events, and the planning margin and operating reserves that must be maintained to achieve acceptable reliability.¹ Figure 1-1 illustrates the effective peak hour capacity need, based on existing supply-side resources. Wind is hard to discern because its contribution to capacity need is small.²PSE will need an additional 1,234 MW of capacity from gas-fired generation by the year 2015.

(Exh. D, page 7)

Energy Need.

Peak hour capacity is an important aspect of PSE's ability to adequately meet the physical needs of our customers. However, our customers demand electric service in more than just one hour each year—they expect reliable electric service during all hours. Figure 1-2 illustrates the company's annual energy forecast. This "energy need" is translated to an hourly basis for analytical purposes. Load forecasts in this chart are aggregated to an annual basis.

(Exh. D, page 8)

3. The plant technology, design, fuel and fuel consumption.

In addition to the information provided in PSE's Petition, please see Attachment C, the Northwest Clean Air Agency's Air Operating Permit No. 006R2 and the Statement of Basis for the Air Operating Permit, for information regarding Ferndale Cogeneration Station's technology, design, fuel, and fuel consumption.

4. Any site certificate or other permits necessary for operation of the power plant, including any determination made by the department of ecology or the energy facility site evaluation council regarding compliance with the performance standard; and such other information as is available concerning the exhaust emissions characteristics of the plant.

Ferndale Cogeneration Station currently operates under authority of Air Operating Permit No. 006R2 issued by the Northwest Clean Air Agency). Please see Attachments B and C for more permit information and exhaust emissions characteristics. Supplementary documents will be made available as they are provided to and obtained by PSE.