



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
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Ms. Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

**Re: Annual Renewable Portfolio Standard Report - 2023
RCW-Required Report, RCW 19.285.070 and
WAC-Required Report, WAC 480-109-210**

Dear Ms. Maxwell:

Attached for filing, please find Puget Sound Energy’s (“PSE”) report detailing the annual reporting requirements for the Renewable Portfolio Standard Report (the “Report”) in RCW 19.285.070 and WAC 480-109-210. PSE is asking the Commission to approve its 2023 Renewable Energy Target of 3,198,752 MWh.

PSE requests confidential treatment for Attachments 4, 5, 7, and 9 to the Report under RCW 80.04.095 and in accordance with WAC 480-07-160. The information labeled as confidential includes commercially sensitive data such as counter-party and confidential information related to renewable energy credit (“REC”) sales revenues and prices, which could expose PSE and its counter-parties to competitive injury if disclosure is unrestricted. Therefore, PSE requests confidential treatment and has labeled such information as “Shaded Information is Designated as Confidential per WAC 480-07-160” as provided in RCW 80.04.095 and in accordance with WAC 480-07-160(2)(c).

The Confidential information is redacted as follows:

Location	Type of Information	Explanation
Attachment 4 First tab: Tables w Facility (C)	REC revenues	This tab contains REC revenue information.
Attachment 4 Second tab: By Period By Vintage (C)	REC revenues	This tab contains REC revenue information.

Location	Type of Information	Explanation
Attachment 4 Fourth tab: Revenue Detail (C)	REC revenues REC prices	This tab contains REC revenue detail by transaction and by resource or agreement.
Attachment 5 Tab 2(a)(ii)Annual2022est, Column G	REC revenues	This column contains REC revenue information from which REC prices could be derived using the REC quantity information in Attachment 3 or 4.
Attachment 7 REC Contracts for First Time Facilities	REC prices Counterparties	This attachment includes REC and power prices and counterparty information.
Attachment 9 REC Transfers for First Time Facilities	Counterparties	This attachment includes REC purchase counterparty information.

As detailed in PSE’s report, PSE is requesting approval that the RECs from two facilities that are being utilized by PSE for the first time are eligible for Renewable Portfolio Standard (“RPS”) compliance. PSE has provided justification and documentation of the eligibility of these facilities in the Report and its Attachments 7 through 9.

A copy of this report will also be submitted to the Department of Commerce.

Last year, PSE filed a 2020 final compliance report under Docket No. UE-200504 which required revision prior to issuance of the Commission order accepting the report. The revisions made in the 2020 final compliance report were not incorporated into PSE’s 2022 Renewable Portfolio Standard (“RPS”) Report filed under Docket No. UE-220405 before its acceptance. The revisions consisted of replacing renewable energy credits (“RECs”) from two Kettle Falls facilities (W797 and W130) with RECs from Nine Canyon Wind Project (W684) which impacted the 2020 and 2021 vintage RECs reported for those facilities. Accordingly, differences will exist between this year’s report and last year’s report when comparing amounts reported for 2020 and 2021 vintage RECs. It is this year’s report which contain the correct amounts as approved in the 2020 final compliance report filed under UE-200504.

One last noteworthy item is that in next year’s RPS Report, companies will be able to utilize RECs for both RPS compliance and Clean Energy Transformation Act compliance.

In a separate matter, PSE will file Microsoft Corporation’s 2023 Target Year RPS Report in Docket UE-161123 pending review by Commission Staff.

Ms. Amanda Maxwell

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If you have any questions about the information contained in this filing, please contact Chris Schaefer at 425-456-2932 or chris.schaefer@pse.com. If you have any other questions please contact me at (425) 456-2105.

Sincerely,

/s/ Susan Free

Susan E. Free

Director of Revenue Requirements and Regulatory Compliance

Puget Sound Energy

PO Box 97034, BEL10W

Bellevue, WA 98009-9734

425-456-2105

susan.free@pse.com

cc: Department of Commerce

Attachments:

PSE 2023 RPS Report

Attachment 1: REC Adequacy Memo

Attachment 2: IRP Appendix G

Attachment 3: Reporting Tool

Attachment 4: REC Sales (Confidential Version)

REC Sales (Redacted Version)

Attachment 5: Incremental Cost Template, (Confidential Version)

Incremental Cost Template, (Redacted Version)

Attachment 6: Department of Commerce EIA Workbook

Attachment 7: First Time Facilities Contracts (Confidential Version)

First Time Facilities Contracts (Redacted Version)

Attachment 8: Proof of Operability

Attachment 9: WREGIS Report for REC Transfers for First Time Facilities (Confidential Version)

WREGIS Report for REC Transfers for First Time Facilities (Redacted Version)