



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

Filed via Web Portal

June 1, 2021

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

**Re: Annual Renewable Portfolio Standard Report - 2021
RCW-Required Report, RCW 19.285.070 and
WAC-Required Report, WAC 480-109-210**

Dear Mr. Johnson:

Attached for filing, please find Puget Sound Energy’s (“PSE’s”) 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 2021 Renewable Energy Target of 3,069,109 MWh.

PSE requests confidential treatment for Attachments 4, 8, and 10 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 on the basis that the information labeled “Shaded Information is Designated as Confidential per WAC 480-07-160” contains “valuable commercial information, including trade secrets or confidential marketing, cost, or financial information, or customer-specific usage and network configuration and design information,” as provided in in RCW 80.04.095 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: Summary Table	REC revenues	This tab contains REC revenue information.

Location	Type of Information	Explanation
Attachment 4 Second tab: Revenue Detail	REC revenues REC prices	This tab contains REC revenue detail by transaction and by resource or agreement.
Attachment 8 REC Contracts for First Time Facilities	REC prices Counterparties	This attachment includes REC prices and counterparty information.
Attachment 10 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 twelve facilities that are being utilized by PSE for the first time are eligible for RPS compliance – eleven are planned for 2020 compliance and one is planned for 2021 compliance. PSE has provided justification and documentation of the eligibility of these twelve facilities in the report and its accompanying attachments.

Additionally, PSE plans to utilize a distributed generation multiplier pursuant to WAC 480-109-200(4)(b)(ii) for REC purchases from certain of the first time facilities that PSE intends to use for 2020 compliance. PSE has provided justification and documentation of the eligibility of these facilities for the distributed generation two times multiplier in the report and its accompanying attachments.

Finally, the section of the 2021 Integrated Resource Plan ("IRP") on which the RPS report relies was inadvertently not filed in the IRP. PSE is in the process of supplementing the IRP in Docket UE-200304 to include the information which should be filed shortly after this RPS filing is made on June 1, 2021. At that time, PSE will supplement this RPS filing with its Attachment 2.

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

In a separate matter, PSE filed Microsoft Corporation's 2021 Target Year RPS Report on May 12, 2021 in UE-161123.

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.

Mr. Mark L. Johnson

June 1, 2021

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Sincerely,

/s/ Susan Free

Susan E. Free

Director of Revenue Requirements and Regulatory Compliance

Puget Sound Energy

PO Box 97034, EST-07W

Bellevue, WA 98009-9734

425-456-2105

susan.free@pse.com

cc: Department of Commerce

Attachments:

PSE 2021 RPS Report

Attachment 1: 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

Attachment 6: Department of Commerce EIA Workbook

Attachment 7: Support for Facilities Used for the First Time

Attachment 8: First Time Facilities Summary and Contracts (Confidential Version)

First Time Facilities Summary and Contracts (Redacted Version)

Attachment 9: Proof of Operability

Attachment 10: WREGIS Report for REC Transfers for First Time Facilities (Confidential Version)

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