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Docket Number: UE-210220
Name: James L Adcock
Title and Date: 3/4/2025 Numerical Evaluation of PSE Clean Energy Acquisition in the Context of the IE.

Summary numbers from the Bates White Evaluation, etc. are as follows:

1,740 GWh / year new clean energy added to PSE mix, as reported to Bates White for the Independent Evaluation.

24,886 GWh / year PSE Load in 2024 (as PSE reported to EIA)

This amounts to about 7% of PSE load to be served by new clean energy, after 5 years of PSE CETA effort, (2020 through 2024)

Which is about 1.4% per year of increasing load served by new clean energy -- assuming no load growth.

At this rate it would take another 14 years for PSE to serve an additional 20% of load by clean energy -- assuming all that clean energy was available when needed (including battery storage, or hydro impoundment storage of that energy [by substitution])

This is assuming no load growth. Unfortunately, PSE projects a 1.8% a year load growth -- a load growth rate faster than the PSE 1.4% new clean energy actual acquisition rate. [EPR 2023 Chapter 6]

This means that PSE is actually moving backwards relative to the requirement to be 100% clean by 2045.

At this combination of clean energy acquisition rate vs. load growth rate, PSE would be left with about 36% of load served by fossil fuel in 2045, verses a 0% CETA requirement.

As such PSE now needs to acquire new clean energy generation at a rate of about 3.2% [of load] a year, versus the 1.4% [of load] a year acquisition rate PSE has demonstrated over the past 5 years. About 2.3X faster than PSE has moved to date.

So, I would score PSE's CETA efforts to date to be an abject failure.

I ask that UTC intervene now to set clear clean energy acquisition targets that PSE is required to meet. I suggest that this next energy acquisition rate be set to 3.2% per year of PSE annual load, averaged, per year over the next RFP period. So then by 2030 PSE should have acquired an additional 16% of load in terms of annual new clean energy generation.

James Adcock, Electrical Engineer, Ratepayer