

BY EMAIL: (to [records@utc.wa.gov](mailto:records@utc.wa.gov))

September 30, 2011

Mr. David Danner  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250, 1300 South Evergreen Park Drive SW  
Olympia WA 98504-7250

RE: Docket No. UE-111405  
Puget Sound Energy Request for Proposals for All Generation Sources

Dear Mr. Danner

The draft Request for Proposals (RFP) establishes preference criteria in Exhibit A without providing any scoring or ranking of those criteria for bidders to better understand the scoring methodology. It would be useful to understand what PSE considers the most valuable preference criteria in order to craft a competitive bid. There appears to be a lack of transparency on behalf of PSE in this regard while requiring a high level of disclosure and transparency on behalf of the bidder. The final RFP should elaborate on how proposed projects will be ranked and scored.

The RFP also shows that most of the preference criteria reflect a bias for gas peaking plants within or near PSE's service territory. This may be consistent with the 2011 IRP but that IRP also recognizes a need for a wider diversity of its renewable energy portfolio. The lack of renewable resources to meet winter peak demand is a major factor contributing to why PSE seeks gas peaking plants. The RFP should be restructured to seek a balanced review of opportunities to acquire west-side renewable resources such as wind or biomass facilities within or near PSE's service territory that could contribute to PSE winter capacity need and help to meet current and future Resource Portfolio Standards. This RFP process should be structured to encourage bids from such west side renewable energy resources with the most system benefits. Such resource should be given added value in the evaluation criteria because a west side wind or biomass resource will lessen the need for PSE to acquire gas powered capacity. This RFP appears to be biased toward selection of gas generation when it should be truly seeking a balanced evaluation of all sources including west side wind and biomass resources that could help meet the winter peaking energy requirements of PSE.

Thank you for the opportunity to comment on this RFP

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