

Puget Sound Energy P.O. Box 97034 Bellevue, WA 98009-9734 Received pse.com Records Management May 31, 2024

## Filed via Web Portal

May 31, 2024

Jeffrey Killip, Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, Washington 98503

## Re: Annual Renewable Portfolio Standard Report - 2024 RCW-Required Report, RCW 19.285.070 and WAC-Required Report, WAC 480-109-210

Dear Executive Director Killip:

Attached for filing, please find Puget Sound Energy's (PSE's) report detailing the annual reporting requirements for the Renewable Portfolio Standard Report (Report) in RCW 19.285.070 and WAC 480-109-210. PSE is asking the Commission to approve its 2024 Renewable Energy Target of 3,208,438 MWh.

PSE requests confidential treatment for Attachments 4, 9, and 11 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 (EC 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.

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Location	Type of	Explanation
	Information	
Attachment 4	REC revenues	This tab contains REC revenue detail by
Fourth tab: Revenue Detail	REC prices	transaction and by resource or agreement.
(C)		
Attachment 9	REC prices	This attachment includes REC and power prices
REC Contracts for First	Counterparties	and counterparty information.
Time Facilities	_	
Attachment 11	Counterparties	This attachment includes REC purchase
REC Transfers for First	_	counterparty information.
Time Facilities		

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 8 through 11.

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

If you have any questions about the information contained in this filing, please contact Chris Schaefer at 425-456-2932 or <u>chris.schaefer@pse.com</u>. 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 2024 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	

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Attachment 6:	Department of Commerce EIA Workbook
Attachment 7:	Apprenticeship Letters
Attachment 8:	First time Facilities Advisory Opinions
Attachment 9:	First Time Facilities Contracts (Confidential Version)
	First Time Facilities Contracts (Redacted Version)
Attachment 10:	Proof of Operability
Attachment 11:	WREGIS Report for REC Transfers for First Time Facilities (Confidential
	Version)
	WREGIS Report for REC Transfers for First Time Facilities (Redacted
	Version)