

July 14, 2017

Mr. Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive  
Olympia, WA 98504-7250

**Re: Comments of Renewable Northwest and NW Energy Coalition on Docket UE-170515: June 13, 2017 Notice of Opportunity to File Written Comments on 2017 Renewable Resource Targets Pursuant to RCW 19.285.070 and WAC 480-109-210(3).**

Renewable Northwest (“Renewable NW”) and the NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on Puget Sound Energy’s (“PSE” or “the Company”) June 1, 2017 filing pertaining to compliance with renewable energy targets set forth in Washington’s Energy Independence Act (“I-937”). We recommend that the Commission approve PSE’s June 1, 2017 filing in the above-referenced docket.

We commend PSE for acquiring sufficient eligible renewable energy to meet the 2017 target, and we are pleased that they intend to meet the target through acquiring renewable energy rather than an alternative compliance mechanism. The renewable energy acquired since the passage of I-937 has built on our legacy hydropower endowment through efficiency investments in hydroelectric generators and new renewable energy projects in Washington; these investments are diversifying our energy portfolio, cleaning our air, creating new jobs, and leading to more stable energy prices for customers.

We are concerned, however, with PSE’s continued use of the Mid-C market forecast price as the non-eligible resource for comparison in its incremental cost calculation. We have commented on this issue multiple times in the past, and we continue to question whether a market forecast is truly a “resource” that can meet the law’s requirement regarding “same contract length or facility life.” However, given that PSE’s incremental cost is generally low, and low in relation to the cost cap, we simply note this concern.

Overall, we are very pleased to see that PSE continues to meet the renewable energy targets set forth in I-937 at a very low incremental cost, and we applaud the Company’s increased transparency related to the incremental cost assumptions and calculation. We support the Commission approving PSE’s June 1, 2017 filing in the above-referenced docket. We appreciate your consideration of these joint

comments, and we look forward to answering any questions at the August 10, 2017 Open Meeting.

Sincerely,

Amanda Jahshan, Renewable Northwest  
Dina Dubson Kelley, Renewable Northwest  
Joni Bosh, NW Energy Coalition  
Wendy Gerlitz, NW Energy Coalition

