



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

September 27, 2018

**Filed Via Web Portal**

Mr. Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

**RE: Advice No. 2018-41 Electric Tariff Filing – Filed Electronically**

Received  
Records Management  
09/27/18 16:43  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Dear Mr. Johnson:

Pursuant to RCW 80.28.060 and Chapter 480-80 WAC, please find enclosed for filing the following proposed revisions to the WN U-60, Tariff G for electric service of Puget Sound Energy (“PSE”).

**1<sup>st</sup> Revision Sheet No. 139-A – Schedule 139: Voluntary Long Term Renewable Energy (continued)**

The purpose of this filing is to revise the total Schedule 139 aggregate subscription load limit from the current level of 75 average megawatts (“aMW”) to 85 aMW to accommodate the total enrollment requests from the August 2018 Open Season that can be served by additional capacity available from the recently identified Schedule 139 renewable solar project. The additional 10 aMW amount is expected to accommodate four customers that are currently on the “waiting list” of the August 2018 Open Season subscription for some or all of their enrollment request.

As provided in the Schedule 139 tariff Sheets, this tariff schedule fully expects that the load amount will be (not “may be”) re-evaluated when the 75 aMW initial amount is fully subscribed:

“...and the load amount will be re-evaluated when the 75 aMW amount is reached.”  
(Sheet No. 139-A, section 2.d. and Sheet No. 139-C, section 5.d.)

Furthermore, the Schedule 139 tariff Sheet No. 139-D, section 6.b. allows Customers to request additional resources (resource options) to be built/purchased at a future date:

“Customers may also request additional resources to be built/purchased at a future date which will meet the guidelines of RCW 19.29A.090.” (Sheet No. 139-D, section 6.b.)

There are two resource options that are included in the existing Schedule 139 Renewable Subscription Resource Option: one wind project and one solar project. The wind project will be built in Western Washington and the solar project will be built in Eastern Washington. To address the current unmet customer need of approximately 10 aMW, PSE has maintained an

expansion option with the developer of the Eastern Washington solar project to procure a comparable incremental amount of project output.

PSE is not proposing any changes to the pricing of the Resource Options in the existing Schedule 139 tariff sheets as a result of the addition of 10 aMW solar resource from the Eastern Washington project. For all Resource Options rates, the price differences due to the additional 10 aMW of solar resource are all within an absolute value of 0.01% of the current yearly rates, with some rates slightly above and others slightly below existing levels. With such minor difference, PSE believes that the resource pricing options currently offered under Schedule 139 tariff Sheet Nos. 139F, 139G, and 139H still reasonably reflect the overall blended price of the Resource Options after increasing the total load served under the program to 85 aMW. Moreover, PSE believes it will lead to a better customer experience and a reduced administrative burden if PSE does not require the 20 customers who have already provided their signed Schedule 139 Service Agreement to go through the process of another round of internal approvals to address the minor price difference.

The tariff sheet described herein reflects an issue date of September 27, 2018, and an effective date of November 1, 2018. Notice of the proposed tariff changes, as required by law and the Commission's rules and regulations, is being given to the public immediately prior to or coincident with the date of this transmittal letter, through web, telephone, and mail access in accordance with WAC 480-100-193(1). Posting of this proposed tariff change will be accomplished in accordance with WAC 480-100-193(1). No notice is required under the provisions of WAC 480-100-194 or -195.

Please contact Heather Mulligan at (425) 456-2916 or Mei Cass at (425) 462-3800 for additional information about this filing. If you have any other questions, please contact me at (425) 456-2142.

Sincerely,

*/s/ Jon Piliaris*

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cc: Lisa Gafken, Public Counsel  
Sheree Carson, Perkins Coie

Attachment:  
Electric Tariff Sheet, listed above