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

December 31, 2019

State Of WASH UTIL. AND TRANSP COMMISSION

Filed via Web Portal

Mr. Mark L. Johnson, Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503

Re: Petition for a Declaratory Order Approving the Avoided Cost Rate Methodology for Power Purchases from Schedule 92 Large Qualified Facilities per WAC 480-106-050(5)

Dear Mr. Johnson:

In accordance with RCW 34.05.240 and WAC 480-07-370(3), 480-07-930 and 480-106-050(5), Puget Sound Energy ("PSE") submits the attached petition ("Petition") and requests that the Washington Utilities and Transportation Commission issue, on or before April 1, 2020, a declaratory order approving PSE's avoided cost rate methodology for PSE's Schedule 92 power purchases from large qualified facilities of greater than five megawatts as described in Exhibit A of the Petition.

As outlined in the cover letter accompanying PSE's November 22, 2019 Schedules 91 and 92 substitute tariff sheets filing, this Petition includes: 1) PSE's proposed avoided cost rate methodology for Schedule 92 qualified facilities; and 2) discussion of the methodology, PSE's integrated resource plan ("IRP"), IRP avoided costs, Schedules of Estimated Avoided Costs per WAC 480-106-040, Schedule 91 pricing model, and the changes between the 2017 and 2019 IRP estimated avoided energy costs.

Please contact Mei Cass at (425) 462-3800 or Eric Englert at (425) 456-2312 for additional information about this filing. If you have any other questions please contact me at (425) 456-2142.

Mr. Mark L. Johnson, Executive Director and Secretary December 31, 2019 Page 2 of 2

Sincerely,

/s/Jon Pílíarís

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Attachments:

Petition

Petition Exhibit A – Schedule 92 Avoided Cost Rate Methodology Petition Exhibit B – Schedule 91 Pricing Model Distribution System Petition Exhibit B – Schedule 91 Pricing Model Transmission System Certificate of Service

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