

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	
	)	Docket UE-24 _____
PUGET SOUND ENERGY	)	
	)	PETITION OF PUGET SOUND ENERGY
For a five-year exemption from WAC 480-109-210	)	
pertaining to Renewable Portfolio Standard	)	
Reporting	)	

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**I. INTRODUCTION**

1. In accordance with WAC 480-07-110 and WAC 480-07-370(3), Puget Sound Energy (“PSE” or “the Company”) respectfully requests the Commission grant PSE’s Petition for a five-year exemption from WAC 480-109-210(2)(a)(i)(B) and (E) which requires the Company to use its most recent Integrated Resource Plan (“IRP”) acknowledged by the Commission to determine eligible resource capacity value and noneligible levelized capacity cost.
2. Statutes and rules at issue in this Petition include RCW 80.01.040, WAC 480-07-110, WAC 480-07-370(3) and WAC 480-109-210.
3. PSE is a combined gas and electric utility that provides service to approximately 1,200,000 electric customers and 860,000 natural gas customers in Western Washington.
4. All correspondence related to this Petition should be directed as follows:

Puget Sound Energy  
Attn: Susan Free  
Director of Revenue Requirements and Regulatory Compliance  
P.O. Box 97034, BEL10W  
Bellevue, WA 98009-9734  
Telephone: (425) 456-2105  
E-mail: susan.free@pse.com

## **II. BACKGROUND**

5. The Energy Independence Act (“EIA” or “I-937”) requires electric utilities serving at least 25,000 retail customers to obtain fifteen percent of their customer’s load from eligible renewable resources, such as water, wind, solar energy, geothermal energy, landfill gas, wave, ocean or tidal power, gas for sewage treatment plants and biodiesel fuel and biomass energy, by 2020 and pursue all conservation that is cost-effective, reliable and feasible.
6. Under WAC Chapter 480-109-210, “on or before every June 1<sup>st</sup>, each utility must file an annual renewable portfolio standard (“RPS”) report with the Commission and the Department of Commerce detailing the resources the utility has acquired or contracted to acquire to meet its renewable resource obligation for the target year.”
7. In accordance with WAC 480-109-210(2)(a)(i)(B) and (E), a utility’s RPS report must utilize information found in the most recent Integrated Resource Plan (IRP) acknowledged by the Commission.
8. On July 25, 2023, the Commission issued a Notice of Change to the Electric IRP Process (“Notice”) stating, “As part of the Commission’s effort to reduce unnecessary administrative burden and duplicative processes, we are discontinuing our practice of issuing acknowledgement letters for electric IRPs in all cases.”

## **III. PSE’S EXEMPTION REQUEST**

9. As the Commission had decided to cease the practice of regularly acknowledging electric IRPs per its Notice issued on July 25, 2023, pursuing compliance with WAC 480-109-210(2)(a)(i)(B) and (E) will limit PSE’s ability to provide the most up-to-date information in the annual RPS report.

10. Therefore, PSE is requesting a five-year exemption from WAC 480-109-210(2)(a)(i)(B) and (E) from the Commission in order for PSE to use its most recently filed IRPs to determine eligible resource capacity value and noneligible levelized capacity cost in its annual RPS report.

#### **IV. REQUEST FOR RELIEF**

11. For the reasons set forth above, PSE respectfully requests the Commission grant PSE's Petition for a five-year exemption from WAC 480-109-210(2)(a)(i)(B) and (E).

DATED this 29<sup>th</sup> day of April, 2024.

**Puget Sound Energy**

By */s/ Susan E. Free*  
Susan E. Free  
Director of Revenue Requirements and  
Regulatory Compliance  
Puget Sound Energy  
PO Box 97034, BEL10W  
Bellevue, WA 98009-9734  
425-462-2105 / [susan.free@pse.com](mailto:susan.free@pse.com)