

July 12, 2019

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
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COMMISSION

Re: Comments of Renewable Northwest and Northwest Energy Coalition on Docket UE-190411: June 10, 2019 Notice of Opportunity to Comment on Electric Utility Energy Independence Act Reports Concerning Conservation and Renewable Portfolio Standards Pursuant to RCW 19.285.070 and WAC 480-109

The NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on Puget Sound Energy’s (“PSE” or “the Company”) June 27, 2019 revised 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 filing in the above-referenced docket.

We commend PSE for acquiring sufficient eligible renewable energy to meet the 2019 target, and we are pleased that the Company intends to meet the target through acquiring renewable energy rather than an alternative compliance mechanism. I-937 continues to drive renewable energy investments that diversify Washington’s energy portfolio, leading to a more reliable grid, rate stability, job creation, and progress towards state emissions goals.

PSE’s continued use of the Mid-C market forecast price as the non-eligible resource for comparison in its incremental cost calculation is inadequate. We continue to question whether a market forecast is a “resource” that can meet the law’s requirement regarding “same contract length or facility life.” It may well be time to rethink the long held-assumption that Mid-C resources or a CCCT are adequate for calculating non-eligible costs. At the very least, non-eligible resources should include the social cost of carbon, per the policy set forth in sections 14 and 15 2SSB 5116. However, given PSE’s low incremental costs, we simply note this concern for this report, but expect this should be part of the discussions around aligning 5116 and 937.

Overall, we are very pleased to see that PSE continues to meet the renewable energy targets set forth in I-937 at a low incremental cost. We support the Commission approving PSE’s June 27, 2019 revised filing in the above-referenced docket, and we appreciate the opportunity to submit these comments for your consideration.

Sincerely,

Joni Bosh, NW Energy Coalition