

June 30, 2015

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 Northwest Energy Coalition on Docket UE-151164:
June 4, 2015 Notice of Opportunity to File Written Comments on 2015 Renewable Resource Target Pursuant to RCW 19.285.040 and WAC 480-109-040.

Renewable Northwest (“Renewable NW”) and the NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on the Puget Sound Energy’s (“PSE’s”) June 1, 2015, filing pertaining to compliance with the January 1, 2015 renewable energy targets set forth in Washington’s Energy Independence Act (“I-937”).

We commend PSE for acquiring sufficient eligible renewable energy to meet the 2015 target, and 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, diversifying our energy portfolio, cleaning our air, creating new jobs and leading to more stable energy prices for ratepayers.

In previous years, Renewable NW and the Coalition have commented extensively on the process for review of compliance filings. The Commission’s rules adopted in March 2015 significantly clarified the process, and we applaud PSE for delivering a report that clearly details the resources they had in place by January 1 to meet the renewable resource obligation for 2015. The report is transparent and clear, providing significantly more information than in previous years.

We appreciate PSE’s transparency and thoughtfulness related to incremental cost calculation over the years. We note that PSE continues to use the Mid-C market forecast price as the non-eligible resource for comparison in their calculation. We have commented on this issue multiple times in the past, and it remains questionable that a market forecast is truly a “resource” that can meet the law’s requirement regarding “same contract length or facility life.” However, with PSE’s incremental cost so far from 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. We support the Commission approving PSE’s June 1, 2015, filing in the above-referenced docket. We appreciate your considering of these joint comments, and look forward to answering any questions at the July 30, 2015 Open Meeting.

Sincerely,

Kelly Hall, Renewable Northwest
Megan Decker, Renewable Northwest
Joni Bosh, NW Energy Coalition
Wendy Gerlitz, NW Energy Coalition