



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

Received
Records Management
06/01/22 14:07:38
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Filed via Web Portal

June 1, 2022

Ms. Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

**Re: Annual Renewable Portfolio Standard Report - 2022
RCW-Required Report, RCW 19.285.070 and
WAC-Required Report, WAC 480-109-210**

Dear Ms. Maxwell:

Attached for filing, please find Puget Sound Energy's ("PSE") report detailing the annual reporting requirements for the Renewable Portfolio Standard Report (the "Report") in RCW 19.285.070 and WAC 480-109-210. PSE is asking the Commission to approve its 2022 Renewable Energy Target of 3,084,363 MWh.

PSE requests confidential treatment for Attachments 4, 5, 8A, 8B, and 10 to the Report under RCW 80.04.095 and in accordance with WAC 480-07-160. The information labeled as confidential includes commercially sensitive data such as counter-party and confidential information related to renewable energy credit ("REC") sales revenues and prices, which could expose PSE and its counter-parties to competitive injury if disclosure is unrestricted. Therefore, PSE requests confidential treatment and has labeled such information as "Shaded Information is Designated as Confidential per WAC 480-07-160" as provided in RCW 80.04.095 and in accordance with WAC 480-07-160(2)(c).

The Confidential information is redacted as follows:

Location	Type of Information	Explanation
Attachment 4 First tab: Summary Table	REC revenues	This tab contains REC revenue information.
Attachment 4 Third tab: Revenue Detail	REC revenues REC prices	This tab contains REC revenue detail by transaction and by resource or agreement.

Location	Type of Information	Explanation
Attachment 5 Tab 2(a)(ii)Annual2022est, Column G	REC revenues	This column contains REC revenue information from which REC prices could be derived using the REC quantity information in Attachment 3 or 4.
Attachment 8A List of REC Contracts for First Time Facilities	REC prices Counterparties	This attachment includes REC prices and counterparty information.
Attachment 8B REC Contracts for First Time Facilities	REC prices Counterparties	This attachment includes REC prices and counterparty information.
Attachment 10 REC Transfers for First Time Facilities	Counterparties	This attachment includes REC purchase counterparty information.

As detailed in PSE's report, PSE is requesting approval that the RECs from three facilities that are being utilized by PSE for the first time are eligible for RPS compliance. PSE has provided justification and documentation of the eligibility of these three facilities in the report and its Attachments 7 through 10.

Additionally, for its 2020 compliance in Docket UE-200504, PSE is utilizing a distributed generation multiplier pursuant to WAC 480-109-200(4)(b)(ii) for purchases of Hidden Hollow and Stoltze Cogeneration RECs. PSE provided justification and documentation of the eligibility of these facilities for the distributed generation two times multiplier in its 2021 RPS Report (Docket UE-210411) but realized after the window for clarification had passed that PSE has not yet received acknowledgement by the Commission for the use of these multipliers. PSE has expressly requested such acknowledgement in its final closeout report in UE-200504 and use of these multipliers for 2020 compliance is reflected in this Report.

Finally, in its Report, PSE addresses a reporting discrepancy found in last year's RPS report that was discovered during the preparation of this filing that has no impact on prior year compliance reports, but does revise the number of certain RECs that were banked forward for compliance years after 2019.

A copy of this report will also be submitted to the Department of Commerce.

In a separate matter, PSE will file Microsoft Corporation's 2022 Target Year RPS Report in Docket UE-161123 pending review by Commission Staff.

Ms. Amanda Maxwell

June 1, 2022

Page 3

If you have any questions about the information contained in this filing, please contact Chris Schaefer at 425-456-2932 or chris.schaefer@pse.com. If you have any other questions please contact me at (425) 456-2105.

Sincerely,

/s/ Susan Free

Susan E. Free

Director of Revenue Requirements and Regulatory Compliance

Puget Sound Energy

PO Box 97034, EST-07W

Bellevue, WA 98009-9734

425-456-2105

susan.free@pse.com

cc: Department of Commerce

Attachments:

PSE 2020 RPS Report

Attachment 1: REC Adequacy Memo

Attachment 2: IRP Appendix G

Attachment 3: Reporting Tool

Attachment 4: REC Sales (Confidential Version)

REC Sales (Redacted Version)

Attachment 5: Incremental Cost Template, (Confidential Version)

Incremental Cost Template, (Redacted Version)

Attachment 6: Department of Commerce EIA Workbook

Attachment 7: Support for Facilities Used for the First Time

Attachment 8A: List of First Time Facilities Contracts (Confidential Version)

List of First Time Facilities Contracts (Redacted Version)

Attachment 8B: First Time Facilities Contracts (Confidential Version)

First Time Facilities Contracts (Redacted Version)

Attachment 9: Proof of Operability

Attachment 10: WREGIS Report for REC Transfers for First Time Facilities (Confidential Version)

WREGIS Report for REC Transfers for First Time Facilities (Redacted Version)