

Attachment A – Proposed Revised Language for PSE’s June 1, 2012 RPS Report

Staff recommends that the Commission order Puget Sound Energy to revised the language of the June 1, 2012 Renewable Portfolio Standard report (UE-120802) as follows:

Revise the first paragraph in Section 1 to read:

Puget Sound Energy, Inc. (“PSE”) does not intend utilize one of the alternative compliance mechanisms provided for in the RCW 19.285.040(2)(d) or RCW 19.285.050(1) and WAC 480.109.030(1),(3) instead of meeting its 2012 renewable resource target. Events beyond PSE’s control may yet occur during the remainder of the calendar year 2012 which could prompt the PSE to utilize the alternative compliance mechanism in RCW 19.285.040(2)(i) and WAC 480.109.030(2). Such determination will be made when PSE reports on its final 2012 compliance in the 2013 or 2014 report.

Replace the paragraph in Section 4 with the following language:

"PSE acquired the following eligible wind resources by January 1, 2012: Hopkins Ridge, Wild Horse, Wild Horse Expansion, Klondike III PPA and Lower Snake River Phase I. Total 2011 generation from Hopkins Ridge, Wild Horse and Wild Horse Expansion was 1,166,224 MWh; similar generation may be achieved for 2012 and 2013. Generation from Klondike III is redacted in this report. Lower Snake River Phase I did not begin operation until 2012, but PSE had contracted for the resource by January 1, 2012. PSE expects to generate more eligible renewable energy than its 2012 target requirement of 635,958 MWh annually; it will also earn more than 127,191 apprentice labor multiplier credits annually.

As of January 1, 2012, some RECs produced or to be produced by the above resources from 2011 through 2013 had been contracted or sold to other entities. However, as of January 1, 2012, PSE met its I-937 renewable energy target for 2012 by retaining the rights to at least 635,958 RECs produced or to be produced from the resources listed above from 2011 through 2013 (plus multiplier credits, where applicable).

PSE’s possession of rights to more than 635,958 RECs produced from these eligible renewable resources from 2011 through 2013 satisfies the January 1, 2012 target for purposes of this report. PSE will report on the specific RECs produced and to be retired for final compliance with the 2012 target in either its 2013 or 2014 report, and reserves the right to submit RECs from the resources reported here or to substitute with RECs produced from 2011 to 2013 by other eligible renewable resources or with 2012 generation from eligible renewable resources that have not been converted to RECs."

Revise the second to last paragraph in Section 6 to read:

Events beyond PSE’s control may yet occur during the remainder of calendar year 2012 which could prompt the PSE to utilize the alternative compliance mechanism in RCW 19.285.040(2)(i) and WAC 480.109.030(2). Such determination will be made when PSE reports on its final 2012 compliance in the 2013 or 2014 report.