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UE-200304

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## **Electronically Filed**

March 31, 2023

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

## Re: Puget Sound Energy 2023 Progress Report on the 2021 Electric IRP Docket UE-200304

Dear Ms. Maxwell,

Enclosed for filing in the above docket are the following documents:

- 1. Work papers supporting Puget Sound Energy's ("PSE") 2023 Progress Report on the 2021 Electric IRP; and
- 2. Certificate of Service.

The work papers supporting PSE's 2023 Progress Report on the 2021 Electric IRP are designated as Confidential per WAC 480-07-160 because they contain Confidential data relating to PSE's existing resource portfolio such as system conditions, generating assets, costs, resource market analysis, and operating parameters, as well as proprietary modelling and analysis performed by PSE's third-party consultants. This information is primarily model output data, and the files cannot be modified or altered without damaging the functionality of the models. This includes altering file names.

Accordingly, while PSE designates the work papers as Confidential per WAC 480-07-160, PSE cannot comply with the marking, shading or other designation requirements set forth in that rule without compromising the data. Doing so would also be impractical and unduly burdensome given the volume of the data. Notwithstanding those limitations, in accordance with WAC 480-07-160(8), those files should be given the same level of protection as if the files had been marked, shaded, or otherwise designated Confidential pursuant to WAC 480-07-160. Folders containing Confidential work papers are labelled with a "(C)" in the folder name and there is a file with the language "CONFIDENTIAL PER WAC 480-07-160" in the file name signifying that the files in that folder are Confidential per WAC 480-07-160 and should be treated

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accordingly. A corresponding redacted set of work papers is also being provided. <u>Only those files should be posted on the Commission website.</u>

PSE has also included the above docket number in the folders containing the work papers but has not included the docket number in file names because many of the files are model outputs where manual editing of file names is not possible or practicable, or would damage interlinking files.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

ASte

David S. Steele

DSS:aes Enclosures

cc: All Parties