



# PUGET SOUND ENERGY

*The Energy To Do Great Things*

Puget Sound Energy, Inc.

P.O. Box 97034

Bellevue, WA 98009-9734

September 23, 2014

Mr. Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, Washington 98504-7250

**RE: Advice No. 2014-27  
Electric Tariff Filing – Filed Electronically**

Dear Mr. King:

Pursuant to RCW 80.28.060 and Chapter 480-80 WAC, enclosed for filing is the following proposed revision to the WN U-60, Tariff G for electric service of Puget Sound Energy (“PSE”).

Attachment “A” to Schedule 91 – Cogeneration and Small Power Production

The purpose of this filing is to add an exhibit, Exhibit E, to Attachment “A”, Power Purchase Agreement, to Schedule 91 – Cogeneration and Small Power Production and to make changes to the relevant pages that make reference to the new exhibit.

Exhibit E, Optional Qualified Reporting Entity Service Agreement, pages 44 through 51, of the proposed Attachment “A”, details the term and condition for PSE to be a Qualified Reporting Entity (“QRE”) with the Western Renewable Electricity Generation Information System (“WREGIS”) for a Schedule 91 qualifying facility customer-generator (“Customer-Generator”). Pages with reference to the exhibit are pages 4, 11, and 40 of Attachment “A”. Under the optional QRE service, PSE will collect a Customer-Generator’s renewable generation data and report the data to WREGIS on behalf of the Customer-Generator. The optional QRE service will be available to Customer-Generators who have an active Power Purchase Agreement with PSE.

WREGIS is an independent renewable energy tracking system for the Western Electricity Coordinating Council (“WECC”) region, which is one of nine regional electric reliability councils under North American Electric Reliability Corporation (NERC<sup>1</sup>) authority. All western states including Washington are part of the WECC. WREGIS tracks renewable energy generation from units that registered with WREGIS using verifiable data and creates renewable energy certificates (“RECs”) for

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<sup>1</sup> NERC is a nonprofit corporation was formed by the electric utility industry to promote the reliability and adequacy of bulk power transmission in the electric utility systems of North America. NERC oversees nine regional reliability entities.

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this generation. PSE is a WREGIS approved Qualified Reporting Entity and Balancing Authority. According to the WREGIS Interface Control Document<sup>2</sup>, "If the Generating Unit currently reports to a Balancing Authority, then this specific Balancing Authority is the preferred Qualified Reporting Entity for those Generating Units in WREGIS, as long as the data can be reported on a Generating Unit basis."

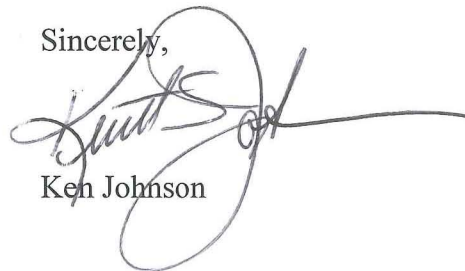
Currently, PSE's Green Power Program purchases RECs directly from 11 renewable energy projects in conjunction with their Schedule 91 Power Purchase Agreements. They represent approximately 85,000 MWH of production a year. These projects vary in size from 30 kilowatts to 4.5 Megawatts. WREGIS is the preferred and convenient method for tracking of RECs and renewable energy generation for both PSE and Customer-Generators who are buying and/or selling RECs.

The proposed annual WREGIS reporting fee for PSE's QRE service is \$358 based upon PSE's costs associated the collection of a Customer-Generator's renewable generation data and the reporting of the data to WREGIS on behalf of the Customer-Generator. However, PSE may waive the reporting fee to Customer-Generators who sell all their RECs generated by a generating unit to PSE in conjunction with their Renewable Energy Credit Agreements (set forth in Schedule 91, Attachment "A", Exhibit C) wherein the cost of QRE reporting is considered in the purchase price of the RECs. Customer-Generators are solely responsible all other fees and expenses required by WREGIS for their own WREGIS accounts and for accessing their WREGIS data.

The tariff sheets described herein reflect an issue date of September 23, 2014, and an effective date of November 1, 2014. Notice of the proposed tariff changes, as required by law and the Commission's rules and regulations, is being given to the public immediately prior to or coincident with the date of this transmittal letter, through web, telephone and mail access in accordance with WAC 480-100-193(1). Posting of this proposed tariff change will be accomplished in accordance with WAC 480-100-193(1).

Please contact Thomas Maclean at (425) 462-3064 or Heather Mulligan (425) 456-2916 or Lynn Logen at (425) 462-3872 for additional information about this filing. If you have any other questions please contact me at (425) 456-2110.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Johnson", with a long horizontal flourish extending to the right.

Ken Johnson

Enclosures

cc: Simon J. ffitch, Public Counsel  
Sheree Carson, Perkins Coie

<sup>2</sup> <https://www.wecc.biz/WREGIS/Documents/WREGIS%20QRE%20Interface%20Control%20Document.pdf>