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

September 9, 2016

Dear Mr. King:

I would like to express World Resources Institute's support for Puget Sound Energy's efforts to meet customer needs through the proposed Energy Schedule No. 139: Voluntary Renewable Energy Tariff (docket UE-160977).

In May 2016, nearly 300 market participants, including nearly 100 representatives from the Fortune 500 met in Redmond, Washington at the 1st annual Renewable Energy Buyers Alliance Summit. The participants had just completed over 3 gigawatts of renewable energy contracts in 2015.¹ However, this falls far short of the corporate buyers' renewable energy goals. More than 69 companies have committed to be powered 100% by renewable energy globally.²

While much of the current renewable energy purchasing has been direct transactions in restructured states, corporate customers are interested in collaborative solutions with their vertically integrated utilities as well. WRI has worked closely with a number of large buyers and vertically integrated, investor owned utilities around the country on the development of new, voluntary renewable energy tariffs or schedules that provide access to bundled energy and RECs while avoiding unfair cost-shifting to non-participating customers.

To date, at least nine other tariffs that bundle energy and RECs have been proposed.³ At least six of these have been approved by the relevant state commissions. Nearly 460 megawatts of contracts for new renewable energy have been signed, so far.

Of particular interest were tariffs proposed by Rocky Mountain Power in Utah and PNM Resources in New Mexico. Both hope to earn the siting of a new data center in their state. Increasingly, predictable access to bundled energy and RECs is a central requirement of the site evaluation for companies with renewable energy targets. Both state commissions have since approved the proposed tariffs, giving the utilities flexibility to serve the new customer and remain relevant in the site selection process.

¹ View the corporate renewable energy contracts tracked by the Business Renewables Center, a Rocky Mountain Institute initiative, at <http://www.businessrenewables.org/corporate-transactions/>.

² RE100 Campaign. A complete list of these companies can be accessed at <http://there100.org/companies>.

³ See WRI's [Emerging Green Tariffs in U.S. Regulated Electricity](#) Markets for details on these tariffs. An update is scheduled to be released by September 30, 2016 documenting new proposals that have emerged since February 2016.



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Supporting Puget Sound Energy's efforts to proactively adapt to emerging customer needs and take full advantage of federal tax incentives for renewable energy, while shielding non-participating customers by limiting the size of the pilot is in the long-term interest of the whole customer-base.

Thank you for your attention to this issue.

Sincerely,

A handwritten signature in black ink that reads "Letha Tawney". The signature is written in a cursive, flowing style.

Letha Tawney
Director of Utility Innovation
World Resources Institute
Washington, D.C.