



Puget Sound Energy
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July 22, 2020

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

**Re: Updated 2020 Annual Renewable Portfolio Standard Report
Docket UE-200504**

Dear Mr. Johnson:

After conversations with Commission Staff, attached for filing, please find Puget Sound Energy’s (“PSE’s”) updated report detailing the annual reporting requirements for the 2020 Renewable Portfolio Standard Report (the “Updated Report”) in RCW 19.285.070 and WAC 480-109-210.

Updates were made to the following sections or attachments as follows:

2020 RPS Report	Section 7 - Eligible Resources: Added an attestation requesting approval of 13 listed facilities PSE has used for the first time.
	Section 8 - Sales: Added 2012 and 2013 columns to reconcile initial table summation disparity.
Attachment 3 Reporting Tool	Added a footnote to Klondike III Facility Detail.
Attachment 5 Incremental Costs	Added 13 facilities PSE has used for the first time. Updated Note 4.

Additionally, PSE provides documentation in support of its request for approval of the 13 facilities it has purchased RECs from for the first time. Attached as the Confidential Contracts workpaper are the REC purchase contracts in place to secure RECs from the 13 facilities. The Confidential WREGIS REC Transfer workpaper provides more detail as to the facilities used. The WREGIS Operability workpaper provides proof that the facilities had commenced operation prior to January 1, 2020.

PSE requests confidential treatment for Attachment 5 to the Updated Report, the Contracts workpaper, and the REC Transfer workpaper under RCW 80.04.095 and in accordance with WAC 480-07-160. The information labeled as confidential includes commercially sensitive data and confidential information related to renewable energy credit (“REC”) sales revenues, which could expose PSE to competitive injury if disclosure is unrestricted. Therefore, PSE requests confidential treatment on the basis that the information labeled “Shaded Information is Designated as Confidential per WAC 480-07-160” contains “valuable commercial information, including trade secrets or confidential marketing, cost, or financial information, or customer-specific usage and network configuration and design information,” as provided in in RCW 80.04.095 in accordance with WAC 480-07-160(2)(c).

The following Confidential information has been redacted:

Location	Type of Information	Explanation
Attachment 5 All tabs	REC revenues REC prices	Every tab of this attachment contains either REC price information or REC revenue information from which REC prices could be derived using the REC quantity information in Attachments 3 or 4.
Contracts workpaper	REC prices Counterparties	This workpaper includes REC prices and counterparty information.
REC Transfer workpaper	Counterparties	This workpaper includes REC purchase counterparty information.

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

Mr. Mark L. Johnson

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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) 456-2142.

Sincerely,

/s/ Jon Piliaris

Jon Piliaris, Director Regulatory Affairs
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cc: Department of Commerce
Service List

Attachments:

PSE Updated 2020 RPS Report

Attachment 3: Updated Reporting Tool

Attachment 5: Updated Incremental Cost Template (Redacted Version)

Updated Incremental Cost Template (Confidential Version)

Contracts Workpaper, Redacted Version

Contracts Workpaper, Confidential Version

WREGIS REC Transfer Workpaper, Redacted Version

WREGIS REC Transfer Workpaper, Confidential Version

WREGIS Operability Workpaper