

Puget Sound Energy, Inc.
P.O. Box 97034
Bellevue, WA 98009-9734

May 27, 2016

## Via Electronic Filing and Overnight Delivery

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

**RE:** Docket UE-140800

Petition for Waiver and to Amend Order

Dear Mr. King:

Puget Sound Energy ("PSE") submits for filing an original and 12 copies of its Petition for Waiver of WAC 480-109-200(3) and to Amend Order 01 in the above-referenced docket.

In Order 01, the Washington Utilities and Transportation Commission required PSE to file a second compliance report no later than June 1, 2016, that provides information necessary to determine whether the Company met the January 1, 2014, target, including the specific megawatt-hours and/or renewable energy credits used to meet the target. PSE's 2014 Final Compliance Report is being made concurrent with this filing.

Additionally, Order 1 required PSE to register all Company-owned incremental hydropower facilities on which the Company intends to rely for compliance with renewable portfolio standard requirements in the Western Renewable Energy Generation Information System ("WREGIS") and to list the certificate numbers for every megawatt-hour and renewable energy credit used to meet its January 1, 2014 target.

Approval from the Washington Department of Commerce ("Commerce") is required prior to registering eligible hydropower generation and all renewable energy credits used for utility compliance with WREGIS. PSE is the first utility to attempt to register incremental hydro located in Washington and has been working with Commerce to establish and complete this process for both the Snoqualmie and the Lower Baker projects and had anticipated that the WREGIS registration process would have been completed with adequate time to retire the

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megawatt hours for the 2014 compliance period. However, based on the time required to complete this process and the necessity to file the close out report prior to June 1, 2016, PSE is requesting a waiver for the 2014 reporting period. Incremental hydropower may only be used for Washington compliance during the year it is generated and absent approval of the waiver, PSE will be required to unnecessarily utilize more of its RECs that could otherwise be banked or sold, ultimately costing our customers more to meet our RPS compliance for calendar 2014.

PSE does certify that the megawatt-hours associated with both incremental hydro projects are solely being used for PSE's compliance and that the company has not sold this generation.

Please contact Katherine Barnard at 425-462-3716 for additional information about this filing. If you have any other questions please contact me at (425) 456-2110.

Sincerely,

Ken Johnson

Director, State Regulatory Affairs

Enclosure