

08/07/20 14:34

State Of WASH.  
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COMMISSION

August 5, 2020

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland square Loop S.E.  
P.O. Box 47250  
Lacey, WA 98503-7250

**Re: Comments of NW Energy Coalition on Docket UE- 200504: June 3, 2020 Notice of Opportunity to Comment on Electric Utility Energy Independence Act Reports Concerning Conservation and Renewable Portfolio Standards**

Dear Mr. Johnson,

NW Energy Coalition (“NWEC”) appreciates the opportunity to comment on Puget Sound Energy’s (“PSE” or “the Company”) June 1<sup>st</sup>, 2020 annual report, revised July 22<sup>nd</sup>, in Docket 200504 detailing compliance with the renewable resource targets set forth in Washington’s Energy Independence Act (“I-937”).

PSE actually exceeds the 2020 standard of 15% for the EIA by relying on eligible resources they own and by acquiring unbundled Renewable Energy Credits (RECs). We commend PSE for acquiring sufficient eligible resources to meet the 2020 target, and at a cost slightly less than last year’s costs. We would urge PSE to make transparent the incremental cost data in future years, as Avista has done this year. We have a minor request regarding REC documentation, that in future reports the documentation regarding the acquisition of any RECs be more clearly summarized, as it was impossible to discern from the redacted new material in the revised July 22<sup>nd</sup> filing if some of the RECs had been acquired by January 1<sup>st</sup>, 2020, as required by law. We thank UTC staff for clarifying that with PSE.

PSE filed Microsoft’s compliance under Docket 161123 earlier in the year. Because NWEC was a party to the special contract settlement, we could review the redacted information and are satisfied that Microsoft’s obligations appear to be fulfilled. We suggest in the future that PSE include in its RPS report a reference to the separate Microsoft filing, so other stakeholders not party to the settlement understand the Microsoft RPS resides in an existing docket.

In the past we have commented on PSE’s continued use of the Mid-C market forecast price as the non-eligible resource used for comparison in its incremental cost calculations is inadequate. We continue to question whether a market forecast is a “resource” that can meet the law’s requirement regarding “same contract length or facility life”, given the goals of the Clean Energy Transformation Act (CETA) and the resources that will be acquired to achieve the laws goals.

We appreciate the opportunity to submit these comments for your consideration.

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