

July 19, 2018

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive
Olympia, WA 98504-7250

Re: Comments of Renewable Northwest and Northwest Energy Coalition on Docket UE-180479: June 7, 2018 Notice of Opportunity to Comment on Electric Utility Energy Independence Act Reports Concerning Conservation and Renewable Portfolio Standards Pursuant to RCW 19.285.070 and WAC 480-109

Renewable Northwest (“Renewable NW”) and the NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on Puget Sound Energy’s (“PSE” or “the Company”) June 1, 2018 filing pertaining to compliance with renewable energy targets set forth in Washington’s Energy Independence Act (“I-937”). We recommend that the Commission approve PSE’s June 1, 2018 filing in the above-referenced docket.

We commend PSE for acquiring sufficient eligible renewable energy to meet the 2018 target, and we are pleased that the Company intends to meet the target through acquiring renewable energy rather than an alternative compliance mechanism. I-937 continues to drive renewable energy investments that diversify Washington’s energy portfolio, leading to a more reliable grid, rate stability, job creation, and progress towards state emissions goals.

We remain concerned, however, with PSE’s continued use of the Mid-C market forecast price as the non-eligible resource for comparison in its incremental cost calculation. 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.” However, given PSE’s low incremental costs, we, again, simply note this concern.

Overall, we are very pleased to see that PSE continues to meet the renewable energy targets set forth in I-937 at a low incremental cost. We support the Commission approving PSE’s June 1, 2018 filing in the above-referenced docket, and we appreciate the opportunity to submit these joint comments for your consideration.

Sincerely,

Amanda Jahshan, Renewable Northwest

Joni Bosh, NW Energy Coalition