

STATE OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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July 9, 2019

Mark L. Johnson, Executive Director and Secretary Washington Utilities and Transportation Commission P. O. Box 47250 Olympia, Washington 98504-7250

RE: Puget Sound Energy's Annual Renewable Portfolio Standard Compliance Report **Docket UE-170515**

Dear Mr. Johnson:

In Order 01 of the above mentioned docket, the Commission determined that Puget Sound Energy (PSE or Company) had complied with the 2017 renewable portfolio standard (RPS) target calculation and initial reporting requirements. The Commission ordered PSE to file a report no later than June 1, 2019, that listed the certificate numbers for every renewable energy credit (REC) that the company retired in the Western Renewable Energy Generation Information System (WREGIS), along with details about which certificates were used for its voluntary renewable energy programs for 2017.

Staff Analysis of PSE's 2017 Final RPS Compliance Report

In its June 1, 2017, filing, PSE correctly calculated its 2017 RPS target of 1,843,118 MWh, and identified a mix of wind-based RECs that the Company banked in 2016 and incremental hydropower generation from 2017 that it planned to use to meet this target. Table 1 below displays the mix of resources that PSE planned to deploy to meet the target.

Table 1: PSE's 2017 Renewable Resource Target and Compliance Plan

2017					Total Compliance	
Target	Incremental	2016	2017	Purchased	Resources	
(MWh)	Hydro (MWh)	RECs	RECs	RECs	(MWh)	
1,843,118	114,286	1,740,090	0	N/A	1,854,376	

On May 13, 2019, PSE filed its final RPS compliance report for 2017. Commission staff (Staff) has reviewed all compliance report materials and determined that PSE has met its 2017 RPS target. Table 2 below details the resources PSE used to meet the target.

Table 2: Summary of 2017 PSE RCW 19.285.040 Compliance

Facility Name	Facility Type	Vintage Year 2016	Vintage Year 2017	Extra Apprenticeship Credits	Total
Lower Snake River -					
Dodge Junction	Wind	500,734		100,147	600,881
Lower Snake River -					
Phalen Gulch	Wind	367,953		73,591	441,544
Klondike III	Wind	64,389			64,389
Wild Horse Phase II	Wind	108,686		21,737	130,423
Wild Horse	Wind	238,895			238,895
Hopkins Ridge	Wind	207,498			207,498
Hopkins Ridge Phase II	Wind	10,000			10,000
Lower Baker River	Incremental Hydro		88,579		88,579
Lower Buker River	Incremental		00,577		00,577
Snoqualmie Falls	Hydro		16,609		16,609
Condon Phase II	Wind		1,069		1,069
Condon	Wind		1,046		1,046
Stateline (WA) FPL					
Energy Vansycle	Wind		3,890		3,890
Grand View 2 West	Solar		18,511		18,511
Grand View 5 East	Solar		6,741		6,741
Horse Butte	Wind		27		27
ID Solar I	Solar		12,048		12,048
Klondike I	Wind		968		968
TOTAL		1,498,155	149,488	195,475	1,843,118

Conclusion

For 2017, PSE has fully complied with the reporting requirements contained in Order 01, entered August 10, 2017.

Sincerely,

Andrew Rector Regulatory Analyst