



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

October 29, 2021

***Filed Via Web Portal***

Ms. Amanda Maxwell, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Received  
Records Management  
10/29/21 14:44  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**RE: Advice No. 2021-39 – Electric Tariff Revision - Filed Electronically**

Dear Ms. Maxwell:

Pursuant to RCW 80.28.060, WAC 480-80-101 and -105, please find enclosed for filing the following proposed new tariff sheets to the WN U-60, tariff for electric service of Puget Sound Energy (“PSE”):

- Original Sheet No. 153 – Qualifying Facility Transmission Interconnection Service
- Original Sheet No. 153-A – Qualifying Facility Transmission Interconnection Service (Continued)
- Original Sheet No. 153-B – Qualifying Facility Transmission Interconnection Service (Continued)
- Original Sheet No. 153-C – Qualifying Facility Transmission Interconnection Service (Continued)
- Original Sheet No. 153-D – Qualifying Facility Transmission Interconnection Service (Continued)
- Original Sheet No. 153-E – Qualifying Facility Transmission Interconnection Service (Continued)
- Original Sheet No. 153-F – Qualifying Facility Transmission Interconnection Service (Continued)
- Attachment “A” to Schedule 153 – Definitions
- Attachment “B” to Schedule 153 – Qualifying Facility Transmission Interconnection Procedures
- Attachment “C” to Schedule 153 – Qualifying Facility Transmission Interconnection Agreement

The purpose of this filing is to add a new optional tariff service that will make available a transmission interconnection service for a qualifying cogeneration facility or a qualifying small power production facility (“QF”) within the meaning of the Public Utility Regulatory Policies Act of 1978 (“PURPA”). This optional service is limited to a qualifying small power production facility with a capacity of no greater than 80 megawatts and does not place a size limit on a qualifying cogeneration facility.

PSE is currently providing its transmission interconnection service under its Open Access Transmission Tariff (“OATT”) on file with the Federal Energy Regulatory Commission (“FERC”). Schedule 153 provides for state-regulated transmission interconnection service, as promulgated by PURPA, which includes a level of interconnection substantially similar to FERC network service, as well as the guaranteed deliverability and purchase of generation.

Key considerations of this new state-regulated transmission interconnection service include interconnection service network upgrade requirements and the financial responsibility of such upgrades. Per WAC 480-106-080 Interconnection costs, “Any costs of interconnection are the responsibility of the owner or operator of the qualifying facility entering into a power contract under this chapter.” PSE has designed the interconnection under Schedule 153 to allow a QF to agree to a curtailment during a System Emergency (as defined in WAC 480-106-007) or a reliability condition (as outlined in Schedule 153), instead of paying for full network service upgrades, in order to keep its interconnection costs manageable.

A QF receiving the optional Schedule 153 service is required to stay Fully Deliverable as detailed in the proposed tariff:

*Fully Deliverable shall mean the Qualifying Facility meets all interconnection requirements, including the construction of any and all (i) necessary interconnection facilities to meet interconnection standards and (ii) system upgrades, if necessary, to deliver output from the Qualifying Facility to Company’s retail customers, and Company has available transmission capacity, including the construction of any and all necessary facilities to guaranty transfer capacity, necessary to deliver the Net Output to any point on Company’s Transmission System.*

This Fully Deliverable standard ensures that the QF will have the necessary interconnection and transmission upgrades needed to provide generation at all times, except for the limited curtailment as outlined above. This is different from FERC Network Resource Interconnection Service<sup>1</sup>, which requires costly interconnection network upgrades to ensure adequate redundancy in interconnection facilities and capacities in case of an N-1-1 outage<sup>2</sup>.

The proposed new Schedule 153 is designed to be the companion interconnection service of PSE’s Schedule 152, Interconnection with Electric Generator, which is limited to distribution interconnection service up to 20 megawatts. With both Schedules 152 and 153 interconnection services, PSE will be able to provide both distribution and transmission interconnection service options through its state-regulated tariff as provided in WAC 480-106-020(3) for the electricity purchased under PSE’s Schedules 91 and 92 per WAC 480-106-020(1).

The Qualifying Facility Transmission Interconnection Procedures (“QFTIP”) and the Qualifying Facility Transmission Interconnection Agreement are based upon the FERC documents for the Standard Large Generator Interconnection Procedures and the Standard Large Generator Interconnection Agreement. PSE has moved and edited the definitions from the QFTIP and QFTIA to a separate Attachment “A” – Definitions. The three attachments to Schedule 153 also include updates to incorporate the interconnection service related obligations of PSE and a QF prescribed in

---

<sup>1</sup> <https://www.ferc.gov/sites/default/files/2020-04/LGIA.pdf>

The FERC pro forma Large Generator Interconnection Agreement defines NRIS as follows:

- [NRIS] shall mean an Interconnection Service that allows the Interconnection Customer to integrate its Large Generating Facility with the Transmission Provider’s Transmission System (1) in a manner comparable to that in which the Transmission Provider integrates its generating facilities to serve native load customers; or (2) in an RTO or ISO with market based congestion management, in the same manner as Network Resources. [NRIS] in and of itself does not convey transmission service.

<sup>2</sup> N-1-1 outage: An outage due to loss of two bulk transmission elements consecutively

Ms. Amanda Maxwell, Executive Director and Secretary

October 29, 2021

Page 3 of 4

Chapter 480-106 WAC and other changes entailed in order to provide transmission interconnection service under the regulatory authority of Washington Utilities and Transportation Commission.

Here is a list of the three attachments and the associated Appendixes.

- Attachment “A” – Definitions
- Attachment “B” – Qualifying Facility Transmission Interconnection Procedures  
List of Appendixes to Attachment “B”:
  - Appendix 1: Interconnection Request
  - Appendix 2: Interconnection Feasibility Study Agreement
  - Appendix 3: Interconnection System Impact Study Agreement
  - Appendix 4: Interconnection Facilities Study Agreement
  - Appendix 5: Optional Interconnection Study Agreement
- Attachment “C” – Qualifying Facility Transmission Interconnection Agreement  
List of Appendixes to Attachment “C”:
  - Appendix A: Interconnection Facilities, Network Upgrades and Distribution Upgrades
  - Appendix B: Milestones
  - Appendix C: Interconnection Details
  - Appendix D: Security Arrangements Details
  - Appendix E: Commercial Operation Date
  - Appendix F: Addresses for Delivery of Notices and Billings
  - Appendix G: Interconnection Requirements for a Wind Qualifying Plant

PSE previewed these proposed tariff sheets with the Renewable Energy Coalition and the Northwest & Intermountain Power Producers Coalition in October 2021. On October 18, 2021, PSE also sent an email progress update to its 2021 All-Source Request for Proposals distribution list, informing bidders and stakeholders that the final draft was available for their review.

The tariff sheets described herein reflect an issue date of October 29, 2021, and an effective date of December 10, 2021. Posting of proposed tariff changes, as required by law and the Commission’s rules and regulations, is being completed coincident with the date of this transmittal letter through web, telephone and mail access in accordance with WAC 480-100-193.

Please contact Mei Cass at (425) 462-3800 or [mei.cass@pse.com](mailto:mei.cass@pse.com) for additional information about this filing. If you have any other questions please contact me at (425) 456-2142.

Sincerely,

*/s/ Jon Piliaris*

Jon Piliaris  
Director, Regulatory Affairs  
Puget Sound Energy  
PO Box 97034, EST-07W  
Bellevue, WA 98009-9734  
(425) 456-2142  
[Jon.Piliaris@pse.com](mailto:Jon.Piliaris@pse.com)

Ms. Amanda Maxwell, Executive Director and Secretary

October 29, 2021

Page 4 of 4

cc: Lisa Gafken, Public Counsel  
Sheree Carson, Perkins Coie

Attachments: Electric Tariff Sheets (listed above)