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October 21, 2022

Via Web Portal

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

Re: Docket UE-200504
Revised 2020 Renewable Energy Target Final Compliance Report
WAC-Required Report: WAC 480-109-210(6)

Dear Ms. Maxwell:

Puget Sound Energy (“PSE” or “the Company”) submits for filing its Revised 2020 Renewable Energy Target Final Compliance Report (the “Revised Report”). In Order 01 in the above-referenced docket, the Washington Utilities and Transportation Commission required PSE to file a second compliance report no later than June 1, 2022, that provides information necessary to determine whether the Company met the January 1, 2020 Renewable Portfolio Standard (“RPS”) approved target of 3,114,782 MWh, including the specific megawatt-hours and/or renewable energy credits (“RECs”) used to meet the target.

PSE’s initial Final Compliance Report for the 2020 Target Year (the “Report”) was filed June 1, 2022. During Commission Staff’s review of the Report, it was determined that the Kettle Falls Biomass Renewable Energy Credits (RECs) retired for 2020 RPS compliance were not eligible for PSE to retire for this purpose. To correct for this, at PSE’s request, the Western Renewable Energy Generation Information System (WREGIS) un-retired the 25,423 of Kettle Falls Biomass RECs on August 30, 2022, and subsequently retired the same number of replacement RECs from Nine Canyon Wind Project.

Attachment 1 to the Revised Report is a revised summary of PSE’s compliance with WAC 480-109-210(6) and RCW 19.285.040 which incorporates the replacement of the Kettle Falls RECs with the Nine Canyon Wind Project RECs. Attachment 2 is a revised listing of certificates retired for 2020 RPS compliance which incorporates the same changes. Attachment 3 is a listing of RECs used for PSE’s voluntary renewable energy programs in 2020. Attachment 3 is unchanged from the June 1, 2022 filing and is included in order to provide a complete report including revisions.

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Additionally, with this revised final compliance filing, PSE continues to request that the Commission approve PSE's use of distributed generation multipliers from two qualifying facilities to achieve compliance with PSE's 2020 target. Attachment 4, also unchanged from PSE's June 1, 2022 filing, is the support required for approving the two times distributed generation multiplier for Hidden Hollow and Stoltze Cogeneration Plant 1 that are further discussed in the Revised Report. PSE requests that the Commission approve PSE's use of the multipliers to achieve compliance with PSE's 2020 target.

Finally, PSE notes that these revisions to the Revised Report impact 2020 and 2021 vintage RECs and as such, would have an impact on PSE's 2022 RPS report that was filed under Docket UE-220405 and which showed those vintage years. Because Docket UE-220405 has already been closed and the 2022 compliance target has been approved in Order No. 01, PSE will reflect the revision to 2020 and 2021 vintages in next year's RPS report to be filed on June 1, 2023.

Please contact Chris Schaefer at 425-456-2932 for additional information about this filing. If you have any other questions please contact me at (425) 456-2105.

Sincerely,

/s/ Susan Free

Susan E. Free

Director of Revenue Requirements and Regulatory Compliance

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Attachments:

Revised Final 2020 RPS Compliance Report

Attachment 1: Revised Summary of 2020 RPS Compliance

Attachment 2: Revised RECs used for 2020 RPS compliance

Attachment 3: RECs used for 2020 voluntary renewable energy programs

Attachment 4: Support for approval of DG multiplier

Certificate of Service