

2021 All-Source RFP: Summary of Public and WUTC Staff Comments

June 1, 2021

Docket UE-210220

#	Summary of Comment(s)	RFP revised?	PSE Response
UTC-15	<p>MARKET RELIANCE</p> <p>Please describe the rationale underpinning PSE's linear rampdown of its reliance on market purchases; references to the 2021 IRP are welcome. In PSE's evaluation of market reliance risk, did the Company identify whether there are any years with a particularly large number of proposed plant shutdowns within the Northwest Power Pool or the Western Interconnect? Was the 1000 MW reduction – from 1500 MW of presumed market availability to 500 MW – a quantitatively rigorous determination or one based on managerial discretion?</p>	N	Please see PSE's response to WUTC staff comment UTC-6.
UTC-16	<p>PORTFOLIO SCREENING MODEL</p> <p>As discussed above, Staff has concerns regarding the use of tools other than those used in developing PSE's IRP for bid evaluation. Please provide more information regarding this decision. Has PSE determined whether PSM will yield results that are comparable to those produced by its IRP analytical toolkit? How would bid evaluation workloads increase and timelines change if PSE decided to use Aurora and Plexos as the primary modeling tools for bid evaluation? How does PSM countenance intrahour costs and benefits?</p>	N	Please see PSE's response to WUTC staff comment UTC-5. Additionally, while the modeling process change is expected to increase some initial planned workload, PSE will make reasonable efforts to adapt and optimize its personnel resources to maintain its All-Source RFP timeline and meet the expectations of bidders and stakeholders.
UTC-17	<p>CAPACITY NEEDS IDENTIFIED IN 2027, CETA-COMPLIANT ENERGY NEEDS IDENTIFIED IN (2026)</p> <p>Why did PSE decide to describe its capacity needs by focusing on the needs identified in 2027, while describing its CETA-compliant energy needs in terms of the Company's need estimate for 2026? The 2026 focus aligns with the requirement that bids meeting CETA-compliant energy needs be online by December 31, 2025, in time to be included within the 2022-2025 CEIP's specific targets and specific actions. Meanwhile, Figure 2 in the Revised Draft RFP shows a mostly-flat representation of PSE's available resources and system need after conservation from 2027 through 2030. Did the Company decide that the years were better suited for describing the specific system need, and that alignment was deemed more useful than keeping the focus year the same between all system needs descriptions?</p>	N	Yes, PSE determined that 2026 and 2027 for the CETA and capacity needs, respectively, were better suited to describe each specific system need. The CETA need has a linear ramp, while the capacity need is a step function based on the timing of resource retirements and the impacts of reduction on market reliance. The CETA need continues to grow at a steady rate after 2026, while PSE's capacity need has a significant increase from 2026 to 2027 (due to expiring contracts) prior to stabilizing. It should be noted that capacity needs begin at the start of the calendar year (January being one of PSE's peak need months); therefore, the 527 MW need in 2027 means that resources should be online by the end of 2026. Year 2027 is also the year by which PSE has proposed to work to fill its market reliance need.