



2026 ANNUAL CLEAN ENERGY PROGRESS REPORT

Pursuant to RCW 19.405 and WAC 480-100-650

Contents

- 1. Previous calendar year coal-fired resources4
- 2. Energy savings4
- 3. Demand response5
- 4. Renewable resources.....5
- 5. Renewable energy credits8
- 6. Retirement of renewable energy credits9
- 7. Nonemitting energy11
- 8. Greenhouse gas content calculation.....12
- 9. Fuel mix disclosure report.....12
- 10. Greenhouse gas emissions12
- 11. Ownership of nonpower attributes.....13
- 12. Other information.....13
- 13. Total retail sales13
- 14. Retail sales for voluntary renewable programs14
- 15. Total electricity production14
- 16. Generation from qualifying facilities14
- 17. Bundled sales of electricity.....14
- 18. Wholesale market electricity sales14
- 19. Wholesale market sales in megawatt-hours.....14
- 20. Bundled electricity from renewable or nonemitting generation15
- 21. Coal fueled generation contracts15
- 22. Coal fueled generation contracts, beginning 202615
- 23. Western Power Pool data15
- 24. Unbundled RECs for alternative compliance15
- 25. Generated or purchased renewable or nonemitting energy16
- 26. Primary compliance renewable or nonemitting energy16
- 27. Total load16
- 28. Retail load16
- 29. Energy storage16

Table 1: Required Annual Clean Energy Progress Report contents under WAC 480-100-650(3)

WAC 480-100-650(3)	Report section
(a) Beginning July 1, 2027, and each year thereafter, an attestation for the previous calendar year that the utility did not use any coal-fired resource as defined in this chapter to serve Washington retail electric customer load.	Section 1 Attestation for the previous calendar year regarding coal-fired resources
(b) Conservation achievement in megawatts, first-year megawatt-hour savings, and projected cumulative lifetime megawatt-hour savings.	Section 2 Energy savings
(c) Demand response program achievement and demand response capability in megawatts and megawatt hours.	Section 3 Demand response
(d) Renewable resource capacity in megawatts, and renewable energy usage in megawatt hours and as a percentage of electricity supplied by renewable resources.	Section 4 Renewable resource data
(e) All renewable energy credits and the program or obligation for which they were used (e.g., voluntary renewable programs, renewable portfolio standard, clean energy transformation standards).	Section 5 Renewable energy credits
(f) Verification and documentation of the retirement of renewable energy credits for all electricity from renewable resources used to comply with the requirements of RCW 19.405.040, 19.405.050, a specific target, or an interim target, except for electricity purchased from Bonneville Power Administration, which may be used to comply with these requirements without a renewable energy credit until January 1, 2029, as long as the nonpower attributes of the renewable energy are tracked through contract language.	Section 6 Retirement of renewable energy credits
(g) Nonemitting resource capacity in megawatts, and nonemitting energy usage in megawatt hours and as a percentage of total electricity supplied by nonemitting energy.	Section 7 Nonemitting energy
(h) The utility's greenhouse gas content calculation pursuant to RCW 19.405.070.	Section 8 Greenhouse gas content calculation
(i) An electronic link to the utility's most recently filed fuel mix disclosure report as required by RCW 19.29A.140.	Section 9 Fuel mix disclosure report
(j) Total greenhouse gas emissions in metric tons of CO ₂ e.	Section 10 Greenhouse gas emissions
(k) Demonstration of ownership of nonpower attributes for nonemitting generation using attestations of ownership and transfer by properly authorized representatives of the generating facility, all intermediate owners of the nonemitting electric generation, and an appropriate company executive of the utility; the utility may not transfer ownership of the nonpower attributes after claiming them in any compliance report.	Section 11 Ownership of nonpower attributes

WAC 480-100-650(3)	Report section
(l) Other information the company agreed to or was ordered to report in the most recently approved CEIP or biennial CEIP update.	Section 12 Other information

Table 2: Required Annual Clean Energy Progress Report contents under WAC 480-100-650(4)

WAC 480-100-650(4)	Report section
(a)(i) Total Washington retail sales.	Section 13 Total retail sales
(a)(ii) Retail sales for customers participating in a voluntary renewable energy purchase program in alignment with RCW 19.405.020(36)(b).	Section 14 Retail sales for voluntary renewable programs
(a)(iii) Total electricity production for all renewable and nonemitting generation owned, contracted, or controlled by the utility.	Section 15 Total electricity production
(a)(iv) Generation from qualifying facilities as described in RCW 19.405.020(36)(a).	Section 16 Generation from qualifying facilities
(a)(v) All electricity sold or transferred for all bundled sales of electricity from renewable and nonemitting sources. For the purposes of this subsection, bundled electricity is electricity that is sold with all its nonpower attributes in the same transaction.	Section 17 Bundled sales of electricity
(a)(vi) All electricity sales in which the electricity was sold by that utility in a wholesale market sale without its associated nonpower attributes.	Section 18 Wholesale market electricity sales
(b)(i) Total monthly megawatt-hours of sales, purchases, and exchanges by counter party of electricity sales in which the electricity was sold by that utility in a wholesale market sale without its associated nonpower attributes. Any contract in which the utility sells electricity in a wholesale market sale without its associated nonpower attributes must include terms stating the seller is not transferring any of the nonpower attributes and the buyer may not represent in any form that the electricity has any nonpower attributes associated with it and that the buyer must include such provision in any sale of the electricity in any subsequent sale it makes.	Section 19 Wholesale market sales in megawatt-hours
(b)(ii) Total monthly megawatt-hours of sales, purchases, and exchanges of bundled electricity from renewable or nonemitting generation. For the purposes of this subsection, bundled electricity is electricity that is sold with all of its nonpower attributes in the same transaction.	Section 20 Bundled electricity from renewable or nonemitting generation
(b)(iii) All purchase contracts longer than one month that source the electricity delivered from coal fueled generation.	Section 21 Coal fueled generation contracts

WAC 480-100-650(4)	Report section
(b)(iv) Beginning January 1, 2026, all existing or new purchase contracts longer than one month with documentation that none of the electricity delivered is sourced from coal fueled generation.	Section 22 Coal fueled generation contracts, beginning 2026
(b)(v) Any data provided to the Western power pool's resource adequacy program or its successor.	Section 23 Western Power Pool data
(c)(i)(A) Except as provided in (c)(iii) of this subsection, a utility may use an unbundled REC for alternative compliance only if the utility demonstrates: The associated electricity was sold, delivered, or transferred without fuel sources or nonpower attributes and under a contract or transaction term expressly stating the fuel source or nonpower attributes are not included (c)(i)(B) Except as provided in (c)(iii) of this subsection, a utility may use an unbundled REC for alternative compliance only if the utility demonstrates: The associated electricity was not delivered, reported, or claimed as a zero-emission specified source or assigned the emissions rate of the renewable generating facility under a greenhouse gas (GHG) program. (c)(ii)(A) A utility's demonstration under this section may be met by documentation that the entity providing the unbundled REC: Provides contract, confirmation, or other transaction terms that comply with the requirements of (c)(i)(A) and (B) of this subsection; (c)(ii)(B) A utility's demonstration under this section may be met by documentation that the entity providing the unbundled REC: Was a party to or otherwise has knowledge of the transaction in which the associated electricity was sold or transferred and attests to (c)(i)(A) and (B) of this subsection; (c)(ii)(C) A utility's demonstration under this section may be met by documentation that the entity providing the unbundled REC: Obtained the unbundled REC from an entity that attests that it and all previous owners of the REC transferred the REC using transaction terms complying with the requirements of (c)(ii)(A) or (B) of this subsection. (c)(iii) To claim and retire an unbundled REC for alternative compliance where the Washington-eligible RECs were created by renewable electricity marketed by the Bonneville Power Administration a utility must demonstrate the REC was not associated with electricity from a system sale from the Bonneville Power Administration directly into a state with a GHG program and to an entity regulated by the state greenhouse gas program. The RECs are calculated based on the same vintage year as the year in which the electricity was imported to the state with the greenhouse gas program. (c)(iv) For the purposes of (c) of this subsection, "greenhouse gas program" includes any governmental program outside of Washington that caps or limits greenhouse gas emissions or requires the purchase, surrender, or retirement of greenhouse gas allowances if the scope of the greenhouse gas program	Section 24 Unbundled RECs for alternative compliance

WAC 480-100-650(4)	Report section
includes electricity imported from outside the governmental jurisdiction and does not require the retirement of RECs for such imported electricity.	
(e) Beginning July 1, 2026, and each year thereafter, the following information shall be reported annually, disaggregated on at least a monthly basis, in megawatt hours: (i) The total amount of renewable or nonemitting energy that is generated or purchased, categorized by resource type, justified by associated RECs or NPAs;	Section 25
(e) (ii) The amount of renewable or nonemitting energy that the utility counts towards primary compliance, categorized by resource type, identified by the vintage of the associated RECs or NPAs;	Section 26
(e) (iii) The total load served by the utility before line losses;	Section 27
(e) (iv) The retail load served by the utility; and	Section 28
(e) (v) The total amount of energy storage resource charging and discharging, for supply-side resources owned or contracted by the utility, categorized by resource type.	Section 29

1. Previous calendar year coal-fired resources

WAC 480-100-650(3)(a) requires, beginning July 1, 2027, an attestation for the previous calendar year that the utility did not use any coal-fired resource to serve Washington retail electric customer load.

This attestation requirement does not take effect until July 1, 2027; thus, Puget Sound Energy, Inc. (PSE) is not reporting on this element in this 2026 Annual Clean Energy Progress Report (progress report).

2. Energy savings

WAC 480-100-650(3)(b) requires the provision of data for conservation achievement in megawatts (MW), first-year megawatt-hour (MWh) savings, and projected cumulative lifetime MWh savings.

Table 3 provides data on the conservation achievement in MW, first-year MWh savings, and projected cumulative lifetime MWh savings (with a weighted average measure life of 9.49 years) for PSE in calendar year 2025.

Table 3: Conservation achievement, first-year savings and projected cumulative lifetime savings in 2025

Energy savings	Savings
Conservation achievement	62.0 MW
First-year MWh savings	315,023 MWh
Projected cumulative lifetime MWh savings	2,991,082 MWh

3. Demand response

WAC 480-100-650(3)(c) requires the provision of data for demand response program achievement and demand response capability in MW and MWh.

Table 4 provides 2025 data on the demand response (DR) events called by PSE in 2025; events were called during the summer season and during the winter season. During DR events, PSE called on a mixture of Automated and Behavioral DR resources (ADR and BDR respectively). These programs include: Flex Events (opt-out BDR), Flex Rewards (opt-in BDR), Flex Smart (Thermostat ADR), Flex Batteries (ADR), Flex EV/EVSE (ADR), Peak Time Rebate (Time Varying Rates), and Business Demand Response Program (BDRP). Ahead of each demand response event, PSE receives vendor-provided forecasts of expected load shed (MW) across all programs. Within two weeks following the event, vendors provide actual performance results, which PSE uses to assess achievement and demonstrated capability. These results are reflected in Table 4 in both MWh and MW.

Past events, and their associated load shed (MWs) actuals, inform what our portfolio is capable of achieving when called upon in a demand response event on a seasonal basis. The MWh figures in Table 4 reflect the event window that had the highest reduction in energy use in 2025 for the winter and summer seasons, while the MW figures reflect the highest nameplate capacity reached during the 2025 calendar year.

Table 4: Demand response program capability and achievement in MW and MWh in 2025

Season	Achievement MWh	Capability MW
Summer (7/29/25)	190.5 MWh	84.2 MW
Winter (2/12/25)	178.3 MWh	89.4 MW

4. Renewable resources

WAC 480-100-650(3)(d) requires the provision of data for renewable resource capacity in MW and renewable energy usage in MWh and as a percentage of electricity supplied by renewable resources.

Table 5 provides renewable energy usage in MWh and as a percentage of electricity supplied by renewable resources for PSE for calendar year 2025. Table 5 separates resources into three categories: utility-scale renewable resources, Bonneville Power Administration (BPA) purchases, and load reducing renewable programs. The 2025 BPA fuel mix percentage will not be finalized until the fourth quarter of 2025. The current percentages provided in this progress report are preliminary numbers.

Table 5: Renewable resources by category in 2025

Program	Renewable energy usage (MWh)	Percentage of electricity supplied by renewable resources
Utility scale	10,827,417	55.7%

Program	Renewable energy usage (MWh)	Percentage of electricity supplied by renewable resources
BPA purchases ¹	282,020	1.4%
Load reducing renewable programs	1,594,402	N/A
Total	*	57.1%

* Total reflects the sum of utility-scale and BPA purchases and does not include load reducing renewable programs as explained in [Section 4](#).

PSE shows the total capacity and energy for utility-scale renewable resources in Table 6. This includes PSE-owned and contracted Clean Energy Transformation Act (CETA)-eligible energy.

Table 6: Renewable resource capacity, renewable energy usage, and electricity supplied by utility scale renewable resources in 2025

Program	Renewable resource capacity (MW)	Renewable energy usage (MWh)	Percentage of electricity supplied by renewable resources
Utility scale	4,063	10,827,417	55.7%

PSE purchases system power from BPA, which has reportable renewable energy derived from BPA's hydro resources. All power sold by BPA is from a pool of resources, which BPA describes as follows:

- The system [BPA] sells from is composed of: an interconnected system of hydroelectric plants known as the Federal Columbia River Power System (FCRPS), the non-federal nuclear power plant Columbia Generating Station, a variety of small non-federal resources (mostly small hydro and wind), and wholesale market purchases.
- Except for an initial, brief period in the late 1930s and early 1940s of marketing power produced only by the Bonneville dam; BPA has not marketed power generated from an individual project.²

BPA will publish an annual fuel mix report for calendar year 2025 that identifies the sources of BPA system power in the fourth quarter of 2026. The BPA data used in this progress report are preliminary values provided by BPA. PSE applies BPA's reported resource mix—85.2 percent renewable and 14.8 percent nonemitting—to allocate the corresponding shares attributable to PSE for purposes of this analysis. Table 7 provides a calculation of the contribution of BPA's system power to the percentage of PSE's electricity supplied by renewable resources.

¹ The Bonneville Power Administration (BPA) fuel mix percentage will not be finalized until the fourth quarter of 2026. The current numbers provided in PSE's 2026 annual report are preliminary numbers.

² Bonneville Power Administration, Why BPA Is Required To Sell From A Pooled System Of Resources, available at <https://www.bpa.gov/-/media/Aep/power/provider-of-choice/bpa-whitepaper-on-system-sales.pdf>.

Table 7: Renewable resource capacity, renewable energy usage, and electricity supplied by BPA system power in 2025

Program	Renewable resource capacity (MW)	Renewable energy usage (MWh)	Percentage of PSE electricity supplied by renewable resources
BPA system power	85.2 ³	282,020	1.4%

Table 8 identifies PSE's agreements with BPA in calendar year 2025 and the calculation of renewable energy identified in Table 6.

Table 8: Breakdown of BPA purchases for renewable energy in 2025

Purchase category	Volume (MWh)
BPA purchases total	330,969
Renewable	282,020 (85.2% ²)

Under CETA, power purchases from a qualifying facility pursuant to the Public Utility Reform Policies Act of 1978⁴ (PURPA) or as part of a voluntary renewable program reduce retail load rather than contribute to meeting CETA goals.⁵ Table 9 identifies PSE's load reducing renewable programs including voluntary renewable programs and purchases from qualifying facilities for calendar year 2025. As required by CETA, PSE reduced retail load by the amounts identified in Table 9, and PSE did not include these amounts in the CETA-eligible energy calculation.

Table 9: Load reducing renewable program resource capacity, renewable energy usage, and electricity supplied by renewable resources in 2025

Program	Renewable resource capacity (MW)	Renewable energy usage (MWh)	Percentage of electricity supplied by renewable resources
Green Direct	286.8	776,933	N/A
Community Solar	16.2	34,638	N/A
PURPA (including Qualifying Facilities and some Green Power projects)	207.6	782,831	N/A

³ Puget Sound Energy (PSE) has a 100 MW capacity contract with the Bonneville Power Administration (BPA) (see Appendix B). In 2025, BPA's preliminary power supply is comprised of 85.2% renewable resources. Therefore, approximately 85.2MW of PSE's contracted capacity is attributable to renewable resources based on BPA's preliminary generation mix.

⁴ RCW 19.405.020(36)(a)

⁵ RCW 19.405.020(36)(b)

5. Renewable energy credits

WAC 480-100-650(3)(e) requires the provision of data for renewable energy credits (RECs) and the program or obligation for which they were used (e.g., voluntary renewable program, renewable portfolio standard, clean energy transformation standards).

This section provides information regarding RECs that are available through Western Renewable Energy Generation Information System (WREGIS) as of the date of the filing of this progress report. It is important to note that PSE continues to work through issues with WREGIS and contracting parties to ensure that PSE can account for all RECs associated with clean energy used to serve customers.

Table 10: Renewable energy credits and the program for which they were used in 2025

Program	Renewable energy credits
Voluntary renewable programs (including Green Direct, Solar Choice, Community Solar, Qualifying Facilities and small Green Power projects)	759,347
Renewable portfolio standard	3,174,553
Clean energy transformation standards	See Section 6

As mentioned in [Section 4](#), CETA treats power purchases from a qualifying facility pursuant to the Public Utility Reform Policies Act of 1978⁶ or as part of a voluntary renewable program as reducing retail load rather than contributing to meeting CETA goals. Therefore, PSE has excluded RECs generated by qualifying facilities or as part of voluntary renewable programs from the calculation of resources meeting CETA goals.

PSE will retire RECs for compliance with the renewable portfolio standard (RPS) program⁷ for calendar year 2025 in a future docket in 2027. PSE's Annual RPS Report filed on May 1, 2026 with commerce⁸, includes the amount of energy generated in 2025 forecasted to be retired for the RPS (and for CETA).⁹ These values are part of the total shown in [Section 6](#) of this progress report, which outlines the 2025 compliance plan from Attachment 3 in Docket [UE-250401](#).

The number of RECs anticipated for CETA compliance in 2025 is shown in Table 10. This list and the amounts are preliminary at the time of this filing, and subject to change in PSE's 2026 Clean Energy Compliance Report.

⁶ RCW 19.405.020(36)(a)

⁷ RCW Chapter 19.285

⁸ The 2024 retired RECs and the 2025 estimated retired RECs are in Appendix F of the 2026 Compliance Report.

⁹ Puget Sound Energy, 2025 Annual Renewable Portfolio Standard Report, Docket UE-250401, available at <https://www.utc.wa.gov/casedocket/2025/250401/docsets>. Verification for the retirement of these RECs is shown in Attachment 3 [250401-PSE-RPS-Attach-3-\(05-30-2025\).xlsx](#).

6. Retirement of renewable energy credits

WAC 480-100-650(3)(f) requires the provision of data for the verification and documentation of the retirement of RECs for all electricity from renewable resources used to comply with the requirements of RCW 19.405.040, RCW 19.405.050, a specific target, or an interim target, except for electricity purchased from BPA, which may be used to comply with these requirements without a renewable energy credit until January 1, 2029, as long as the nonpower attributes of the renewable energy are tracked through contract language.

As of the date of this progress report, PSE has only retired RECs for RPS purposes for the years 2022¹⁰, 2023¹¹, and 2024¹². PSE has not retired any other RECs for purposes of the full 2022-2025 Clean Energy Implementation Plan (CEIP) compliance period. PSE has reported 2025 RECs and its plans to retire for the 2022-2025 CEIP compliance period in the 2026 Clean Energy Compliance Report, and currently has no retired RECs to report under WAC 480-100-650(3)(f).

Table 11 identifies the MWhs as collected by PSE near the generator and the REC amounts registered in WREGIS associated with renewable energy used by PSE to serve retail electric load in calendar year 2025. The differences between the MWhs and the REC amounts are primarily due to losses between different metering locations. PSE continues to investigate inconsistencies in the data collected in the WREGIS database as explained in Section 5, and explore improvements in its renewable resource data collection processes for CETA reporting. PSE anticipates retiring RECs and demonstrating the retirement of RECs to meet its CETA interim target at the end of each four-year CEIP compliance period. PSE plans to rely on a mix of existing and new CETA-eligible renewable resources, and the associated bundled RECs when available, to meet the four-year interim target.

Table 11 includes a column titled “REC Equivalent (Exemption).” This column identifies the following renewable resources for which PSE contractually owns the environmental attributes associated with such renewable resources, but RECs are not currently available in WREGIS:

- Q1 2024 Short-Term RFP Agreements and Kerr Dam: The ownership of the environmental attributes associated with this zero-carbon energy directly passes to PSE under contract, and the counterparty does not register RECs in WREGIS. This energy falls within the exception in WAC 194-40-400(2)(b)(ii).

¹⁰ Puget Sound Energy, 2022 Annual Renewable Portfolio Standard Report, Docket UE-220405, available at <https://www.utc.wa.gov/casedocket/2022/220405/docsets>. Verification for the retirement of these RECs is shown in Attachment 1 (220405-PSE-Att-1-(05-31-2025).xlsx) of this docket.

¹¹ Puget Sound Energy, 2023 Annual Renewable Portfolio Final Compliance Report, Docket UE-230413, available at <https://www.utc.wa.gov/casedocket/2023/230413/docsets>. Verification for the retirement of these RECs is shown in Attachment 1 (230413-PSE-Final-Att.1-(05-30-2025).xlsx) of this Docket.

¹² In 2025, PSE became exempt (see [WAC 480-96-015](#)) from Washington Utilities and Transportation Commission (UTC) reporting rules for the Renewable Portfolio Standard (RPS) [WAC 480-109-210](#). 2024 retired RECs can be viewed in the 2026 compliance report in Appendix F.

- BPA System Power: As noted in [Section 4](#) and [Section 7](#), PSE has calculated an amount of renewable energy and nonemitting energy from BPA system power based on the BPA fuel mix report for calendar year 2025.
- Energy Imbalance Market (EIM) Hydro Sold to California: PSE will not claim the RECs or environmental attributes from the energy sold into California through the EIM. Table 11 reflects this energy being decremented from the CETA eligible energy, and the associated RECs not included in the CETA eligible calculation.

Table 11: CETA RECs generated in 2025

Source	Name	MWh	Renewable energy credits in WREGIS	REC equivalent (exemption)
Carbon free	Q1 2024 Short-Term RFP Agreements	368,039		368,039
Hydro	Chelan PUD – RI & RR – major contract	3,591,545	3,782,306	-
Hydro	Douglas PUD – Wells Project	622,074	622,074	-
Hydro	Grant PUD – Priest Rapids Project	789,744	789,744	-
Hydro	Kerr Dam – Energy Keeper	350,313	-	350,313
Hydro	Lower Baker	364,774	364,789	-
Hydro	Snoqualmie Falls	165,913	164,731	-
Hydro	Upper Baker	335,700	335,666	-
Hydro	EIM sales to California	-	-	-
Hydro	BPA power system	330,969	-	330,969
Hydro	Total	6,919,071	6,059,310	1,049,321
Wind	Avangrid renewable (Golden Hills)	612,826	612,826	-
Wind	Beaver Creek Wind	185,052	185,052	
Wind	Clearwater Wind	1,328,834	1,328,837	-
Wind	Hopkins Ridge	348,103	348,104	-
Wind	Klondike Wind Power III	121,976	118,018	-
Wind	Lower Snake River	804,682	801,249	-
Biomass	Sierra Pacific Industries	131,819	131,818	-
Wind	Stateline Wind PPA	49,890	47,072	-
Wind	Vantage Wind PPA	53,973	54,064	-
Wind	Wild Horse	602,155	602,153	-
Existing wind / solar / biomass	Total	4,239,310	4,229,193	-
All existing	Total	11,158,381	10,288,503	1,049,321

PSE's annual CETA goal for calendar year 2025 was 63%. Based on the values in Tables 5, 11 and 12, PSE's actual percentage of electricity supplied by renewable energy and nonemitting resources was 57.4% in 2025. Tables 5 and Table 12 provide the overall renewable and nonemitting energy

generated, which matches the number of RECs in Table 11 above. This verifies the energy and associated RECs from renewable resources in calendar year 2025.

PSE’s actual percentage of electricity supplied by renewable energy and nonemitting resources in 2025 was lower than its annual goal due to two reasons. One reason is the low hydro energy generation in atypical weather conditions (i.e., a very warm summer and dry winter). Another reason is higher actual load compared to what was forecasted for the year. Retail sales were 6% higher than the 2021 CEIP forecast.

7. Nonemitting energy

WAC 480-100-650(3)(g) requires the provision of information regarding nonemitting resource capacity in MW and nonemitting energy usage in MWh and as a percentage of total electricity supplied by nonemitting energy. CETA defines the term “nonemitting electric generation” as follows:

(a) “Nonemitting electric generation” means electricity from a generating facility or a resource that provides electric energy, capacity, or ancillary services to an electric utility and that does not emit greenhouse gases as a by-product of energy generation.

(b) “Nonemitting electric generation” does not include renewable resources.¹³

In calendar year 2025, PSE purchased system power from BPA under several agreements. BPA’s fuel mix report for calendar year 2025 provides that approximately 14.8% of BPA’s system power consisted of electricity generated by the Columbia Generating Station¹⁴. The Columbia Generating Station is a nuclear generator that meets the definition of “nonemitting electric generation.”

Table 12 provides the nonemitting resource capacity in MW, and nonemitting energy usage in MWh and as a percentage of total electricity supplied by nonemitting energy.

Table 12: Nonemitting resource capacity, renewable energy usage, and electricity supplied by nonemitting resources in 2025

Program	Nonemitting resource capacity (MW)	Nonemitting energy usage (MWh)	Percentage of electricity supplied by nonemitting resources
Nonemitting resource (BPA System Power)	14.8 ¹⁵	48,948	0.3

¹³ RCW 19.405.020(28)

¹⁴ BPA 2025 preliminary numbers, *supra* note 2.

¹⁵ Puget Sound Energy (PSE) has a 100 MW capacity contract with the Bonneville Power Administration (BPA) (see Appendix B). In 2025, BPA’s preliminary power supply is comprised of 14.8% nonemitting resources. Therefore, approximately 14.8MW of PSE’s contracted capacity is attributable to nonemitting resources based on BPA’s preliminary generation mix.

Table 13: Breakdown of BPA purchases for nonemitting energy in 2025

Purchase category	Volume (MWh)
BPA purchases total	330,969
Nonemitting energy	48,948 (14.8%)

8. Greenhouse gas content calculation

WAC 480-100-650(3)(h) requires the provision of the greenhouse gas content calculation pursuant to RCW 19.405.070.¹⁶

Pursuant to WUTC Order 01 in docket UE-250751 PSE is exempt from this requirement. The WUTC approved a waiver of the reporting requirements of WAC 480-100-650(3)(j) and (h), because they are duplicative, calculable from other accessible data or rendered unnecessary because of the repeal. Therefore, electric utilities need not calculate or report greenhouse gas content calculations under the Clean Energy Transformation Act.

9. Fuel mix disclosure report

WAC 480-100-650(3)(i) requires the provision of an electronic link to the most recently filed fuel mix disclosure report as required by RCW 19.29A.140.

The 2025 Fuel Mix Report for PSE is not available at the time of this filing. The Washington Department of Commerce (Commerce) begins its process for preparing a fuel mix report for a calendar year in the second quarter of the following calendar year. PSE files a preliminary draft fuel mix report for calendar year 2025 on or before July 1, 2026. Commerce reviews the preliminary draft fuel mix report by the end of the third quarter of 2026 and finalizes the report by the end of November 2026.

For example, PSE will receive the necessary guidance from Commerce regarding the fuel mix report for calendar year 2025 in the fourth quarter of 2025. PSE will publish data for calendar year 2025 in the fourth quarter of 2026, dependent on the process of Commerce. As of the date of this progress report, PSE can only provide an electronic link to the [2024 Fuel Mix Report](#).

10. Greenhouse gas emissions

WAC 480-100-650(3)(j) requires the provision of data regarding total greenhouse gas emissions in metric tons of CO₂e.

¹⁶ UE-250751, Order 01 <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=12&year=2025&docketNumber=250751>

Pursuant to WUTC Order 01 in docket UE-250751 PSE is exempt from this requirement. The WUTC approved a waiver of the reporting requirements of WAC 480-100-650(3)(j) and (h), because they are duplicative, calculable from other accessible data or rendered unnecessary because of the repeal. Therefore, electric utilities need not calculate or report greenhouse gas content calculations under the Clean Energy Transformation Act.

11. Ownership of nonpower attributes

WAC 480-100-650(3)(k) requires the demonstration of ownership of nonpower attributes for nonemitting generation using attestations of ownership and transfer by properly authorized representatives of the generating facility, all intermediate owners of the nonemitting electric generation, and an appropriate company executive of the utility.

PSE purchased system power from BPA in calendar year 2025 pursuant to the Day Ahead Notice Capacity & Energy Surplus Sale Agreement between BPA and PSE, dated March 2, 2020 (the “Surplus Sales Agreement”). As discussed in [Section 4](#), BPA’s preliminary fuel mix report for calendar year 2025 states that 85.2% of BPA’s system power consisted of electricity generated by renewable resources. As discussed in [Section 7](#), BPA’s preliminary fuel mix report for calendar year 2025 states that 14.8% of BPA’s system power consisted of electricity generated by nonemitting electric generation.

Section 3(a) of the Surplus Sales Agreement provides that “BPA shall convey to PSE all Low Carbon Attributes and associated reporting rights, as defined in the WSPP Agreement, for all Firm Energy delivered to PSE under this Agreement.” Section 2(h) of the Surplus Sales Agreement defines the term “Low Carbon Attributes” as “environmental attributes consisting of emission reductions, reporting rights and avoided pollutants and carbon dioxide. One megawatt-hour (MWh) of energy generation from the Federal System is associated with one MWh of Low Carbon Attributes.”

12. Other information

WAC 480-100-650(3)(l) requires the provision of other information the company agreed to or was ordered to report in the most recently approved CEIP or Biennial CEIP Update. PSE is not aware of any other information to provide in this progress report that the company agreed to or was ordered to report in its 2021 CEIP or 2023 Biennial CEIP Update.

13. Total retail sales

WAC 480-100-650(4)(a)(i) requires the provision of data regarding total Washington retail sales.

PSE has completed installation of 99.8% of its AMI meters, which provides advanced hourly retail usage data.

14. Retail sales for voluntary renewable programs

WAC 480-100-650(4)(a)(ii) requires the provision of data regarding retail sales for customers participating in a voluntary renewable energy purchase program in alignment with RCW 19.405.020 (36)(b).

PSE provides hourly and monthly data for our community solar program and monthly data for each renewable program.

15. Total electricity production

WAC 480-100-650(4)(a)(iii) requires the provision of data regarding total electricity production for all renewable and nonemitting generation owned, contracted, or controlled by the utility.

16. Generation from qualifying facilities

WAC 480-100-650(4)(a)(v) requires the provision of data regarding electricity purchased from generation of qualifying facilities as described in RCW 19.405.020(36)(a).

17. Bundled sales of electricity

WAC 480-100-650(4)(a)(v) requires the provision of data regarding electricity sold or transferred for all bundled sales of electricity from renewable and nonemitting sources.

PSE did not sell bundled electricity from renewable or nonemitting resources in calendar year 2025. Accordingly, PSE has nothing to report in this progress report regarding bundled electricity sold from renewable or nonemitting resources in calendar year 2025.

18. Wholesale market electricity sales

WAC 480-100-650(4)(a)(vi) requires the provision of data regarding electricity sales in which the electricity was sold by that utility in a wholesale market sale without its associated nonpower attributes.

19. Wholesale market sales in megawatt-hours

WAC 480-100-650(4)(b)(i) requires the provision of data regarding total monthly MWh of sales, purchases, and exchanges by counter party of electricity sales in which the electricity was sold by that utility in a wholesale market sale without its associated nonpower attributes.

20. Bundled electricity from renewable or nonemitting generation

WAC 480-100-650(4)(b)(ii) requires the provision of total monthly megawatt-hours of sales, purchases, and exchanges of bundled electricity from renewable or nonemitting generation. For the purposes of this subsection, bundled electricity is electricity that is sold with all its nonpower attributes in the same transaction.

21. Coal fueled generation contracts

WAC 480-100-650(4)(b)(iii) requires the provision of power purchase agreements with a term longer than one month that source the electricity from coal-fired resources.

As of the date of the filing of this progress report, PSE does not have any active coal fueled generation contracts.

22. Coal fueled generation contracts, beginning 2026

WAC 480-100-650(4)(b)(iv) requires the provision, beginning January 1, 2026, of all existing or new purchase contracts longer than one month with documentation that none of the electricity delivered is sourced from coal fueled generation.

As of the date of the filing of this progress report, PSE does not have any active coal fueled generation contracts. Accordingly, PSE has nothing to report in this progress report regarding this element.

23. Western Power Pool data

WAC 480-100-650(4)(b)(v) requires the provision of any data provided to the Western Power Pool's (WPP) Western Resource Adequacy Program (WRAP) or its successor.

24. Unbundled RECs for alternative compliance

WAC 480-100-650(4)(c) requires the provision of certain information regarding the use of unbundled RECs for alternative compliance with CETA.

PSE does not plan to use unbundled RECs for alternative compliance with CETA prior to 2030-2033 compliance period. Accordingly, PSE has nothing to report in this progress report regarding the use of unbundled RECs for alternative compliance with CETA.

25. Generated or purchased renewable or nonemitting energy

WAC 480-100-650(4)(e)(i) The total amount of renewable or nonemitting energy that is generated or purchased, categorized by resource type, justified by associated RECs or NPAs.

26. Primary compliance renewable or nonemitting energy

WAC 480-100-650(4)(e)(ii) The amount of renewable or nonemitting energy that the utility counts towards primary compliance, categorized by resource type, identified by the vintage of the associated RECs or NPAs;

27. Total load

WAC 480-100-650(4)(e)(iii) The total load served by the utility before line losses.

28. Retail load

WAC 480-100-650(4)(e)(iv) The retail load served by the utility.

29. Energy storage

WAC 480-100-650(4)(e)(v) The total amount of energy storage resource charging and discharging, for supply-side resources owned or contracted by the utility, categorized by resource type.

As of the date of this progress report, PSE does not have any charging resources to report on.