

November 6, 2013

***VIA ELECTRONIC FILING***

Washington Utilities and Transportation Commission

1300 S. Evergreen Park Drive, S.W.

P.O. Box 47250

Olympia, Washington 98504-7250

Attn: Steven V. King

 Executive Director and Secretary

**RE:** **Docket No. UE-131883 – Comments**

**Investigation of the costs and benefits of distributed generation and the effect of distributed generation on utility provision of electric service**

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) submits the following comments in accordance with the Washington Utilities and Transportation Commission’s (Commission) Notice of Recessed Open Meeting and Notice of Opportunity to Submit Written Comments (Notice) issued in Docket UE-131883 on October 15, 2013.

In the Notice, the Commission requested written comments on the issue of distributed generation, and provided a list of specific questions directed to the investor owned utilities. The Company addresses each of these questions in detail below.

1. **The total number of net metering customer, the total capacity of installed generation of the net metering customers as of October 31, 2013 on the company’s system, and the company’s net metering cap as of January 1, 2014**

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| Net Metering as of October 31, 2013 |
| Customers  | 126 |
| Installed Capacity | 873 kW |

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| --- |
| Net Metering Capacity Cap as of January 1, 2014 |
| 0.5% of 1996 Peak Demand | 4,550 kW |

1. **A description of DG interconnected to the company’s distribution system that is not enrolled in the net metering program, including the aggregated capacity for each generation type as of October 31, 2013.**

Currently, all distributed generation systems interconnected to the Company’s distribution system are enrolled in the net metering program.

1. **Aggregated on a company-wide basis, the number of net metering credits that expired under RCW 80.60.030(5), on April 30 in 2011 and 2012, and the aggregate number of net metering credits awarded per month in 2011 and 2012.**

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| Expired Net Metering Credits |
| April 20, 2011 | 1,669 kWh |
| April 30, 2012 | 4,222 kWh |

|  |
| --- |
| Monthly Net Metering Credits (kWh) |
| Month | 2011 | 2012 |
| January | 1063 | 3645 |
| February | 609 | 2093 |
| March  | 373 | 1822 |
| April | 1430 | 667 |
| May | 0 | 270 |
| June | 0 | 352 |
| July | 7 | 632 |
| August | 198 | 14 |
| September | 54 | 239 |
| October | 549 | 4769 |
| November | 1476 | 6244 |
| December | 4239 | 3645 |

PacifiCorp appreciates the opportunity to provide comments and encourages the Commission to take these into account when finalizing these rules. If you have any questions regarding these comments, please contact me at (503) 813-6051.

Sincerely,

William R. Griffith

Vice President, Regulation