

November 1, 2021

UE-210848

VIA ELECTRONIC FILING

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

Received
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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: Advice 21-11—Schedule QF—Avoided Cost Purchases from Cogeneration and Small Power Purchases

PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) submits proposed tariffs applicable to PacifiCorp’s electric service in the state of Washington in compliance with RCW 80.28.050, WAC 480-106-040, and the Washington Utilities and Transportation Commission’s (Commission) Rules and Regulations. The Company respectfully requests an effective date of January 1, 2022.

First Revision of Sheet No. QF.11	Schedule QF	Avoided Cost Purchases and Procedures for Qualifying Facilities
First Revision of Sheet No. QF.12	Schedule QF	Avoided Cost Purchases and Procedures for Qualifying Facilities
First Revision of Sheet No. QF.13	Schedule QF	Avoided Cost Purchases and Procedures for Qualifying Facilities
First Revision of Sheet No. QF.14	Schedule QF	Avoided Cost Purchases and Procedures for Qualifying Facilities
First Revision of Sheet No. QF.15	Schedule QF	Avoided Cost Purchases and Procedures for Qualifying Facilities
First Revision of Sheet No. QF.16	Schedule QF	Avoided Cost Purchases and Procedures for Qualifying Facilities
First Revision of Sheet No. QF.17	Schedule QF	Avoided Cost Purchases and Procedures for Qualifying Facilities
First Revision of Sheet No. QF.18	Schedule QF	Avoided Cost Purchases and Procedures for Qualifying Facilities

WAC 480-06-040(1) requires utilities to file a revision to its tariff for purchases from qualifying facilities, a schedule of estimated avoided costs that identifies, both separately and combined, its avoided cost of energy and its avoided cost of capacity by November 1 of each year. The revised Schedule QF includes these components.

The Company respectfully requests a waiver of WAC 480-06040(1) as it requires an estimated avoided cost of capacity be “based on the projected fixed cost of the next planned capacity

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addition identified in the succeeding twenty years in the utility's most recently acknowledged integrated resource plan." The Company's last acknowledged IRP was its 2017 IRP as its currently filed 2021 IRP has not yet been acknowledged. As a result, the updated avoided costs were calculated using the methodology consistent with the Commission's rules, the additional direction given through Order 01 in docket UE-190666, and approved in the Company's currently effective tariffs.

In addition, the methodology continues to rely on the exemption of WAC 480-106-040(1)(b)(i) granted in Order 01 to calculate the avoided cost of capacity for solar resources using the fixed costs for solar based on the results of PacifiCorp's 2017S request for proposals and a capacity contribution of two percent. As a result, the Company requests that the Commission continue the exemption granted in Order 01 in docket UE-190666 for this filing.

The proposed rates in the revised Schedule QF reflect the impacts of updated market prices and an updated inflation forecast consistent with those market prices. In addition, the levelization period for the avoided cost of capacity required under WAC 480-106-040(1)(c) has been rolled forward by one year. No other changes have been made.

PacifiCorp is providing confidential workpapers, which contain sensitive commercial information, as confidential under the provisions of WAC 480-07-160. A redacted version is also being provided.

It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon, 97232

Please contact Ariel Son at (503) 813-5410 if you have any questions.

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Sincerely,

 /s/
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Enclosures

21-11-PAC-Attach-A-11-1-21
21-11-PAC-Attach-B-11-1-21
21-11-PAC-WPs-11-1-21 (C)
21-11-PAC-WPs-11-1-21 (R)