

May 11, 2020

VIA ELECTRONIC FILING

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket UE-190652 – PacifiCorp Comments in Rulemaking to Amend Energy Independence Act WAC 480-109

PacifiCorp dba Pacific Power and Light Company (PacifiCorp) submitted comments in Docket UE-190652 regarding the Energy Independence Act (EIA) rules on May 1, 2020 – as directed by the Notice of Opportunity to Comment distributed March 27, 2020.

PacifiCorp would like to modify the portion of the May 1 comments addressing the inclusion of the definition of CO₂ equivalent (CO₂e) in the EIA rules as follows:

PacifiCorp does not have any concerns with the inclusion of the definition of CO₂e as proposed in the draft EIA rules, and respectfully asks that the Commission not consider the portions of PacifiCorp's comments requesting clarification on the inclusion of CO₂e into utility planning processes at this time. PacifiCorp may re-file the planning portions of the CO₂e comments in a subsequent Clean Energy Transformation Act rulemaking as appropriate.

Please direct informal inquiries to Jacob Goodspeed, Regulatory Affairs Project Manager, at (971) 804-5345.

Sincerely,

/s/

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