

**UTC Comment form for Energy Independence Act Rulemaking, Proposed WAC 480-109, Docket UE-131723**

Submit this form by 5 PM Monday, Oct. 6, 2014 via the Commission’s Web portal at [www.utc.wa.gov/e-filing](http://www.utc.wa.gov/e-filing) or by e-mail to [records@utc.wa.gov](mailto:records@utc.wa.gov).

Comments on behalf of: Public Utility District No. 1 of Chelan County Commenter: Melissa Lyons E-mail: [melissa.lyons@chelanpud.org](mailto:melissa.lyons@chelanpud.org) Phone: 509.661.4369

*Name of Organization or “self”*

In the first column, fill in the section or subsection of interest in the rule. In the next columns provide the specific text, proposal for change, and rationale.

Comment 1	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109-020(7)(b)(ii) & (iii)	<p>(ii) Using power curve-based production models to calculate the facility's generation under the river discharge of each year in the historical period for the pre-upgrade state and the post-upgrade state;</p> <p>(iii) Calculating the arithmetic mean of generation in both the pre-upgrade and post-upgrade states over the historical period;</p>	<p>(ii) Using power curve-based production models to calculate the facility's generation in the historical period for the pre-upgrade state and the post-upgrade state;</p> <p>(iii) Calculating the arithmetic mean of generation in both the pre-upgrade and post-upgrade state(s) for the historical period;</p>	<p>Chelan PUD uses a calculation of long-term average water based on the best available flow data (69 consecutive years for Columbia River flows). This long-term average water is then run through power curve-base production model under the pre-upgrade and post-upgrade state.</p> <p>The current text requires this calculation of pre-upgrade and post-upgrade state for each year. Chelan PUD’s proposed change would allow the utility to continue to use a calculation of long-term average water to determine the pre-upgrade average generation (one number) and post-upgrade average generation (one number). More info regarding this approach is provided in the attached Chelan PUD’s EIA Average Water Calculation summary.</p> <p>In addition, Chelan PUD has attached a red-line of the draft incremental hydro rules with additional notes and considerations for tracking through WREGIS.</p>

Comment 2	Current Text	Proposed Text	Rationale for proposed change
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<p>Regarding WAC 480-109-020(7)(c)(ii) &amp; (iii)</p>	<p>(ii) Using a production model to calculate the facility's generation in megawatt-hours under the river discharge of each year in the historical period for pre-upgrade state and the post-upgrade state;</p> <p>(iii) Calculating the arithmetic mean generation of the pre-upgrade and post-upgrade states over the historical period in megawatt hours;</p>	<p>(ii) Using a production model to calculate the facility's generation in megawatt-hours under the pre-upgrade state and the post-upgrade state;</p> <p>(iii) Calculating the arithmetic mean generation of the pre-upgrade and post-upgrade state(s) for the historical period in megawatt hours;</p>	<p>Same comments as stated above in Comment 1.</p>
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Comment 3	Current Text	Proposed Text	Rationale for proposed change
<p>Regarding WAC 480-109-<span style="background-color: yellow;">          </span></p>			

Comment 4	Current Text	Proposed Text	Rationale for proposed change
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Regarding WAC 480-109- <span style="background-color: yellow;">      </span>			
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Comment 5	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109- <span style="background-color: yellow;">      </span>			

Comment 6	Current Text	Proposed Text	Rationale for proposed change
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Regarding WAC 480-109- <span style="background-color: yellow;">          </span>			
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Comment 7	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109- <span style="background-color: yellow;">          </span>			

Comment 8	Current Text	Proposed Text	Rationale for proposed change
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Regarding WAC 480-109- <span style="background-color: yellow;">      </span>			
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Comment 9	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109- <span style="background-color: yellow;">      </span>			

Comment 10	Current Text	Proposed Text	Rationale for proposed change
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Regarding WAC  
480-109-          

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