**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 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.

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| Comment 1 | Current Text | Proposed Text | Rationale for proposed change |
| Regarding WAC 480-109-020(7)(b)(ii) & (iii) | (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;  (iii) Calculating the arithmetic mean of generation in both the pre-upgrade and post-upgrade states over the historical period; | (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;  (iii) Calculating the arithmetic mean of generation in both the pre-upgrade and post-upgrade state(s) for the historical period; | 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.  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.  In addition, Chelan PUD has attached a red-line of the draft incremental hydro rules with additional notes and considerations for tracking through WREGIS. |

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| Comment 2 | Current Text | Proposed Text | Rationale for proposed change |
| Regarding WAC 480-109-020(7)(c)(ii) & (iii) | (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;  (iii) Calculating the arithmetic mean generation of the pre-upgrade and post-upgrade states over the historical period in megawatt hours; | (ii) Using a production model to calculate the facility's generation in megawatt-hours under the pre-upgrade state and the post-upgrade state;  (iii) Calculating the arithmetic mean generation of the pre-upgrade and post-upgrade state(s) for the historical period in megawatt hours; | Same comments as stated above in Comment 1. |

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| Comment 3 | Current Text | Proposed Text | Rationale for proposed change |
| Regarding WAC 480-109-\_\_\_\_\_ |  |  |  |

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| Comment 4 | Current Text | Proposed Text | Rationale for proposed change |
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| Comment 5 | Current Text | Proposed Text | Rationale for proposed change |
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| Comment 6 | Current Text | Proposed Text | Rationale for proposed change |
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| Comment 7 | Current Text | Proposed Text | Rationale for proposed change |
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| Comment 10 | Current Text | Proposed Text | Rationale for proposed change |
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