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Subject: Electric COS Generic Call for Comments
Date: Tuesday, March 6, 2018 2:41:00 PM
Attachments: [List of issues \(1\).xlsx](#)

All,

Thank you for participating in the first COS Generic 2018 meeting. From Staff's perspective, a rulemaking process would be the most appropriate forum to continue a generic cost-of-service discussion. We see several key topic areas that need clear and consistent treatment, as provided by rule. We understand that certain areas may be addressed through a policy statement or whitepaper.

Staff has identified several topics for discussion. We would like to understand all stakeholder's position and opinions regarding these or other topics that should be included in this docket.

Please see the attached document for potential topic areas to discuss.

We would like to receive comments concerning staff's proposed topic areas and rulemaking proposal from all stakeholders by March 30, 2018. Please provide your written comments through the records center referencing Docket UE-170002.

Thank you,

Jason Ball
Washington Utilities and Transportation Commission
360-664-1279

	Description	Rule/Policy	Why do we need it?
Templates	COSS Presentation	Rule (Template on file)	The goal is to make everyone's job easier when reviewing rate cases. Templates allow historical reference and comparison between positions, cases, and companies. It is aligned with the spirit of a streamlining process.
	Revenue Requirement/COSS Cross-Check	Rule (Template on file)	
	COS Allocations List	Rule (Template on file)	
Procedures	Load study	Rule	A new load study should be performed every five years. Load studys should also include information about generation (dispatch vs. load) and the relationship between dispatch and market sales.
	COSS with minimal confidential	Rule	All PII should be removed before filing a COS study. As Transactive energy becomes more widely adopted care should be given to balance confidential concerns with public interest
	Reconciliation of billing determinants and test year unadjusted revenues	Rule	All companies must present this reconciliation as a requisite when filing a general rate case or an expedite rate filing, and use this as a baseline reference to compare with the ROO.
	Special Contract customers must have a marginal cost study	Rule	A marginal cost study should be included with any new special contract. The study should be updated when the contract is renewed or at least every 7 years (based on GRC filings). What defines a Special Contract Customer and a Marginal Cost Study will need to worked on.
Policy Statement	Various COS method for Demand/Energy Split	Policy	Policy paper should discuss different methods, their strengths and weaknesses, and identify options. It should also provide clarity around commonly used terms and how categories are to be used and defined.
	Defining transmission and distribution for allocation and classification	Policy	
	Treatment of Fuel Costs	Policy	
	Treatment of Purchased Power Costs	Policy	
	Common and Joint Costs	Policy	
	A&G Costs	Policy	
	Poles, Conductors, and Line Transformers.	Policy	
	COS Methods by asset (Hydro vs. Wind vs. Tx)	Policy	
	COS Method for demand allocation (by class)	Policy	
	Language used to described COSS	Policy	
Granularity of Data	Policy	AMI deployment will increase the availability of sub-hourly data. To what extent should sub-hourly data be employed in COS? To what degree should seasonal variations be balanced with the need to define a system peak (top 200 hours vs 1 CP)	
Baseline COSS	Policy	An explicitly approved COSS for each Company serves as baseline for future cases. All proposals in subsequent cases are departures from the approved COSS and do not update baseline unless explicitly ordered. Subsequent cases require reapproval of changes.	