

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 or by e-mail to records@utc.wa.gov.

Comments on behalf of: ICNU Commenter: Joshua Weber E-mail: jdw@dvclaw.com Phone: 503.308.3548

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 480-109-100(8)(a)	Portfolio. A utility’s conservation portfolio must pass a cost-effectiveness test consistent with that used in the Northwest Conservation and Electric Power Plan. A utility must evaluate conservation using cost-effectiveness tests consistent with those used by the council, and as required by the commission, except low-income conservation programs.	Portfolio. A utility’s conservation portfolio must pass a cost-effectiveness test consistent with that used in the Northwest Conservation and Electric Power Plan. A utility must evaluate conservation using cost-effectiveness tests consistent with those used by the council, and as required by the commission, except low-income conservation programs. <u>Costs included in the portfolio level analysis include conservation-related administrative costs.</u>	The Commission’s orders approving the utilities’ ten year conservation plans have consistently specified that administrative costs must be included in calculations of cost-effectiveness. Including this Commission language in the rule is appropriate, particularly in light of the increasing administrative costs that will be incurred if the Commission adopts the proposed rule and its carbon-intensity metric reporting.

Comment 2	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109-210(2)(a)(i)(A)	Eligible resource levelized cost. Determine the levelized cost of each eligible resource, including integration costs, using the utility’s commission-approved weighted average cost of capital at the time of the resource’s acquisition as the discount rate;	Eligible resource levelized cost. Determine the levelized cost of each eligible resource, including integration costs <u>calculated consistently with its IRP, including its wind integration study</u> , using the utility’s commission-approved weighted average cost of capital at the time of the resource’s acquisition as the discount rate;	ICNU agrees with the inclusion of language specifically including integration costs in the incremental cost calculation. The proposed language will promote transparency and ensure that stakeholders and the Commission receive information that can be readily evaluated.