

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	DOCKET NO. UE-131723
)	
Energy Independence Act Rulemaking, WAC 480-109)	COMMENTS OF THE INDUSTRIAL CUSTOMERS OR NORTHWEST UTILITIES
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I. INTRODUCTION

On September 5, 2014, The Washington Utilities and Transportation Commission (the “Commission” or “WUTC”) served notice of the opportunity to file written comments regarding the Commission’s new proposed rule implementing Initiative Measure No. 937, titled the Energy Independence Act (“EIA”), which would replace the rule currently contained in Washington Administrative Code Chapter 480-109. The Industrial Customers of Northwest Utilities (“ICNU”) appreciates the opportunity it has had to participate in workshops held by the Commission regarding the EIA implementation rules, and submits these Comments regarding the proposed rule.

II. COMMENTS

ICNU is generally supportive of the proposed rule, which adopts a number of recommendations developed by the parties during rulemaking workshops and comment periods, and which will promote greater transparency and predictability in the implementation of the EIA. Particularly, the proposed rule specifies that integration costs must be included when utilities calculate the incremental costs of compliance with the EIA and creates a more consistent framework for such calculations. The Commission’s

proposed rule also codifies the Conservation Planning and Reporting requirements that have been already been imposed upon the utilities through individual orders.

ICNU continues to believe that additional clarity regarding reporting the costs of conservation and RPS compliance should be included in the rule, and recommends the minor changes noted in the attached comment form. In addition, ICNU remains concerned about the potential administrative burden and associated costs that may be imposed by the additional reporting requirements imposed by Section 480-109-300 of the proposed rule.

III. CONCLUSION

ICNU appreciates the effort exerted by the Commission to produce the proposed rule that would replace the current WAC Chapter 480-109. ICNU respectfully requests the Commission adopt the modifications to the proposed rule presented in these comments.

Dated this 6th day of October, 2014.

Respectfully submitted,

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