

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Public Utility District No. 1
of Chelan County, Washington's Petition for
Declaratory Order Regarding Application of
WAC 480-109-200

DOCKET UE-170840

COMMISSION STAFF'S
RESPONSE TO PUBLIC UTILITY
DISTRICT NO. 1 OF CHELAN
COUNTY, WASHINGTON'S
PETITION FOR A
DECLARATORY ORDER

INTRODUCTION

1 On July 27, 2017, Chelan PUD filed with the Commission a petition for a
declaratory order approving as eligible renewable resources, the generation from
incremental efficiency gains at its hydroelectric projects. See RCW 34.05.240; RCW
19.285.030; WAC 480-109-200.

2 On July 28, 2017, the Commission issued a notice of opportunity to respond to
Chelan PUD's petition.

BRIEF BACKGROUND AND RECOMMENDATION

3 In its petition, Chelan PUD focuses on its Rocky Reach and Rock Island
hydroelectric projects. It represents in part that the methodology it employs is endorsed by
both the Commission and the state Department of Commerce and complies with WAC 480-
109-200(7). Commission Staff agrees.

4 Staff reviewed Chelan PUD's petition, consulted with the Department of Commerce,
and determined that the methodology employed by Chelan PUD produces substantially the
same result as the methodology required by WAC 480-109-200(7)(c).

5 While Staff is satisfied with Chelan PUD’s engineering analysis and the resulting percentages for calculating incremental hydropower production, it does not believe it necessary for the Commission to make a specific finding regarding Chelan PUD’s engineering analysis. Rather, Staff recommends the Commission issue a declaratory order finding that:

6 The Rocky Reach hydroelectric project may be used for compliance with WAC 480-109-200. The eligible amount is 14.73 percent of annual production at the Rocky Reach hydroelectric project.

7 The Rock Island hydroelectric project may be used for compliance with WAC 480-109-200. The eligible amount is 9.67 percent of annual production at the Rock Island hydroelectric project.

8 Chelan PUD further requests the Commission accept updates to these percentages. Staff believes this is not necessary. If Chelan PUD makes additional improvements to its projects, it should file a new petition. Absent additional improvements, there should not be a need to update the percentages. Staff recommends that Chelan PUD simply use the established percentages each year going forward.

CONCLUSION

9 For the reasons stated above and in Chelan PUD’s filing, Commission Staff recommends the Commission issue an order declaring that the incremental hydropower at Chelan PUD’s Rocky Reach and Rock Island hydroelectric projects may be used for compliance with WAC 480-109-200. The Commission’s order should further declare that

the eligible amounts are 14.73 percent of total production at Rocky Reach and 9.67 percent of total production at Rock Island.

DATED this 11th day of August 2017.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General

SALLY BROWN
Senior Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff