

June 3, 2020

**VIA ELECTRONIC FILING**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503

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COMMISSION

**Re: Docket UE-190666—PacifiCorp's Standard Power Purchase Agreement  
Revision to Proposed Effective Date**

On May 28, 2020, PacifiCorp dba Pacific Power & Light Company (PacifiCorp) submitted the enclosed standard power purchase agreement (Standard PPA) as an attachment to the recently approved Schedule QF, Avoided Cost Purchases and Procedures for Qualifying Facilities, in compliance with WAC 480-106 et. seq (the May 28<sup>th</sup> Filing).

As summarized in the May 28<sup>th</sup> Filing, PacifiCorp provided the attached updated form of Standard PPA to counsel for the Renewable Energy Coalition (REC) and the Northwest and Intermountain Power Producers Coalition (NIPPC) on May 4, 2020. In subsequent discussions with REC and NIPPC earlier this month, REC and NIPPC requested additional time to review the form of Standard PPA due to the challenges associated with participating in competing dockets in Washington and other jurisdictions during this same time period. PacifiCorp understands REC and NIPPC's request, particularly in light of the challenges inherent in managing client coordination and feedback in the current COVID-19 environment, and therefore agreed to support a request for additional time provided that such additional time for discussion among PacifiCorp, REC and NIPPC<sup>1</sup> (i) does not prevent PacifiCorp from processing QF requests in Washington consistent with Schedule QF as recently approved including, as necessary, executing Standard PPAs; and (ii) the Washington Utilities and Transportation Commission (Commission) does not view the extended time period as constituting non-compliance with the WAC 480-106 et. seq., and the Commission's associated orders in this docket. REC and NIPPC supported the above conditions.

In the May 28<sup>th</sup> Filing, PacifiCorp proposed a schedule for finalizing and approving the enclosed form of Standard PPA that was developed and agreed to with REC and NIPPC.

On May 29, 2020, Staff contacted PacifiCorp expressing concern with the process proposed in the May 28<sup>th</sup> filing. In lieu of that process, Staff requested that PacifiCorp, REC and NIPPC continue informal discussions regarding the form of Standard PPA, and PacifiCorp request an effective date for the form of Standard PPA that allows sufficient time for the parties to conclude those informal discussions with the goal of reaching consensus.

In light of Staff's advice, PacifiCorp submits this updated letter requesting an effective date of September 1, 2020, for the form of Standard PPA attached to the May 28<sup>th</sup> Filing. If PacifiCorp,

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<sup>1</sup> Commission Staff is also invited to participate in these discussions if interested and resources permit.

Washington Utilities and Transportation Commission  
June 3, 2020  
Page 2

REC and NIPPC agree to revisions to the filed form of Standard PPA before the proposed September 1, 2020 effective date, PacifiCorp will supplement its filing appropriately.

Please contact Ariel Son at (503) 813-5410 if you have any questions.

Sincerely,

/s/  
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Michael Wilding  
Director, Net Power Costs and Regulatory Policy  
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Enclosure