Agenda Date: July 25, 2013

Item Number: D1

Docket: UE-111880

Company: Pacific Power & Light Company

Staff: Jeremy Twitchell, Regulatory Analyst

Recommendation

Issue an Order in Docket UE-111880 finding that:

- (1) Pacific Power & Light Company has complied with the June 1, 2014, reporting requirements pursuant to WAC 480-109-040.
- (2) Pacific Power & Light Company has complied with Order 01 in Docket UE-111880.
- (3) Pacific Power & Light Company has achieved 111,923 megawatt-hours of conservation during the 2012-2013 biennium.

Discussion

On May 30, 2014, Pacific Power & Light Company (PacifiCorp or company) filed its 2012-2013 Biennial Conservation Report (report) with the Washington Utilities and Transportation Commission (commission), as required by Order 01 in this docket, RCW 19.285.070(1), and WAC 480-109-040(1)(a). The report indicated that the company had achieved 111,853 megawatt-hours of savings during the 2012-2013 biennium.

After filing the report, the company identified a minor calculation error that caused it to over-report savings from its insulation program. Commission staff (staff) and Public Counsel also identified a handful of minor items in the filing that required clarification, including the company's omission of savings from production efficiency programs in its reported achievement. Based on these findings, the company filed a revised report on July 1, 2014, which revised its biennial conservation achievement upward to 111,923 MWh.

A full discussion of the issues corrected by the revised report is available in staff's comments filed on June 30, 2014, in this docket. Staff is satisfied that the revised report addressed all of those issues.

Public Counsel was the only other party to file comments regarding PacifiCorp's report. In its comments, filed on June 18, 2014, Public Counsel recommended that the company file a revised report for the reasons listed above. Public Counsel stated that PacifiCorp appears to have complied with statutory reporting requirements and the conditions that the commission imposed when it approved PacifiCorp's 2012-2013 conservation target.

¹ In the Matter of Pacific Power & Light Company's 2012-2021 Ten-Year Achievable Conservation Potential and 2012-2013 Biennial Conservation Target Under RCW 19.285.040 and WAC 480-109-010, Docket UE-111880, Order 01 ¶ 29 (April 26, 2012).

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Public Counsel encouraged the company to implement the suggestion of its third-party conservation reviewer, SBW Consulting, to closely monitor its tracking and reporting system to ensure that it aligns with best practices. Like staff, Public Counsel also recommended that future third-party reviews include on-site evaluations of the company's conservation projects.

Conclusion

Staff recommends that the commission issue an order in Docket UE-111880 as described in the recommendation section above.