

August 26, 2019

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
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Lacey, Washington 98503-7250

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

08/29/19 08:05

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Re: Comments of Northwest Energy Coalition on Docket UE-190448: August 22, 2019 Update to June 10, 2019 Notice of Opportunity to Comment on Electric Utility Energy Independence Act Reports Concerning Conservation and Renewable Portfolio Standards Pursuant to RCW 19.285.070 and WAC 480-109

The NW Energy Coalition (“the Coalition”) appreciates the opportunity to comment on the updated Pacific Power (PAC) filing pertaining to compliance with renewable energy targets set forth in Washington’s Energy Independence Act (“I-937”). We had recommended the Commission withhold approval of this report until transparency was increased and that cost calculations and specifics about resources and renewable energy credits (RECs) used to comply with I-937 were made available to the public. While we are not in complete agreement on every point, as detailed below, we think this report can be accepted for this year, with the caveat that we may raise some further concerns in the next round of reports.

We would like to thank PAC for their work and appreciate PAC’s efforts to comply, especially in a short time frame. We are pleased to see data now available that was previously redacted. PAC has agreed that all generation forecasts and all incremental costs of owned resources will now be public, which addresses part of one of our concerns raised previously “*At the very minimum, the Annual Report should contain a summary of each resource, the number of MWhs, the one-year incremental cost and what resources and their values were used to calculate those costs.*” However, we did not come to agreement on whether REC costs from third party providers should be revealed; it is hard to understand why costs from contracts signed several years ago cannot be public, as those costs do not reflect current market prices. PAC argues their agreements with counter parties would prevent such disclosure, but at a certain point, the costs are dated, and the contracts should allow for disclosure after some length of time.

At the very least, NVEC would like to see the total cost of third party provided RECs disaggregated by resource type; for example, the annual average cost of wind RECs, with the annual average cost of solar RECs, rather than one number that represents all the renewable resources combined. Only if there were one specific generator in each resource category which might make truly confidential information discernable would it perhaps make sense to allow PAC to combine average costs and resources. The point is to track progress on meeting the RPS, so the more granular the data, the better.

In our original comments we expressed concern about the company’s reporting on the incremental cost calculations in confidential papers. It appears some of the methodology (excluding

incremental costs of contracted RECs) has now been made public, we see this as progress. There may be more that can be done in subsequent years.

NWEC thanks the Commission, Commission staff and PAC for tackling these aspects of transparency and confidentiality and for making public the data the public needs from regulated monopolies.

Cordially,

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