



Rob McKenna
ATTORNEY GENERAL OF WASHINGTON
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July 16, 2012

VIA ELECTRONIC FILING & ABC/LMI

David Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
P. O. Box 47250
Olympia, WA 98504-7250

Re: In the Matter of Evaluating Electric Utility Renewable Portfolio Standard Reports Under the Energy Independence Act, RCW 19.285 and WAC 480-109 Dockets UE-120791, UE-120802 and UE-120813)

Dear Mr. Danner:

On June 1, 2012, Puget Sound Energy, Avista Utilities, and PacifiCorp filed reports related to both the renewable and conservation components of the Energy Independence Act (EIA). Due to limited resources, Public Counsel has focused its review on the conservation component of the reports, which were filed pursuant to RCW 19.285.070 and WAC 480-109-040. Public Counsel will file detailed comments on the conservation issues. Public Counsel has not reviewed the reports as they pertain to the renewable component of the EIA, and we do not take a position with regard to reporting or compliance.¹

It is important to note that the Commission determination in these renewable dockets does not constitute a finding of prudence with respect to any renewable resource. The prudence of renewable resources for ratemaking purposes is determined by the Commission in the context of a general rate case for the applicable company at the time the Company seeks to recover the costs in rates. Public Counsel accordingly reserves the right to engage in a prudence review of

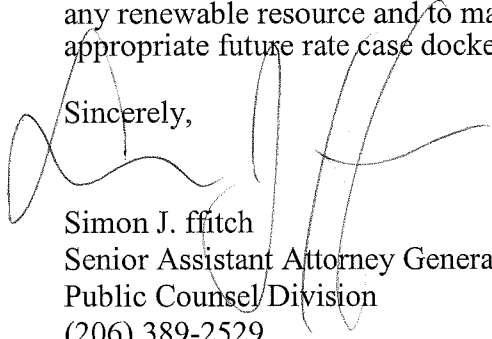
¹ While Public Counsel was on the mailing list of the Renewable Portfolio Standards Workgroup, Docket No. UE-110423, Public Counsel notified Staff and other participants in May 2011 that it would not be attending workshops and would have only a monitoring role.

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any renewable resource and to make a prudence recommendation for that resource in the appropriate future rate case docket.

Sincerely,



Simon J. Fitch
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SJf:cjw

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