



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 20, 2011

David Danner, Executive Director and Secretary
Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98514-7250

Re: Docket Number UE-100514

Dear Mr. Danner:

RCW 19.28 requires that utilities develop an integrated resource plan that includes how it will meet current and projected needs at the lowest possible cost and risk to the utility and its rate payers. "Lowest reasonable cost" is to include public policies regarding resource preferences adopted by Washington State or the federal government, and the cost of risk associated with environmental effects including carbon dioxide emissions.

RCW 70.235.020 directs the state to reduce its greenhouse gas emissions to 1990 levels by 2020. Therefore, we believe how a utility will reduce its contribution to the state's overall emission levels is part of the "lowest reasonable cost" analyses.

We are pleased that Pacific Power and Light's 2011 Integrated Resource Plan includes several sections that outline the company's plans to reduce its carbon footprint, both as a provider of electricity and within its business operations. The plan recognizes that, in the future, there will be a cost on carbon dioxide emissions and includes a range of costs in the various planning scenarios. It explores the future retirement of coal power facilities, as well as the impact of increased utilization of clean energy resources, demand-side management and carbon capture and storage. We encourage Pacific Power and Light to pursue a preferred portfolio that will result in consistent carbon emission reductions over time and will put the company firmly on the path to a low carbon future. We believe this is in the best interests of not only the company but of its customers as well.

We found Pacific Power and Light's analysis both thorough and helpful. Thank you for the opportunity to comment.

Sincerely,

Janice Adair
Special Assistant to the Director

