



Bob Ferguson  
**ATTORNEY GENERAL OF WASHINGTON**

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May 14, 2015

**SENT VIA UTC WEB PORTAL AND US MAIL**

Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Pk. Dr. S.W.  
PO Box 47250  
Olympia, WA 98504-7250

**Re: Docket UE-100749—Compliance Filing  
Annual Report of Proceeds from the Sale of Renewable Energy Credits**

Dear Mr. King:

Public Counsel submits this letter in response to PacifiCorp's May 1, 2015 Renewable Energy Credit (REC) Compliance Filing in this docket. PacifiCorp's compliance filing includes an annual report of proceeds from the sale of Renewable Energy Credits (RECs) but does not include a true-up and revision to Schedule 95. Public Counsel understands the Commission Orders in Docket UE-100749 to require an annual true-up and revision to Schedule 95.<sup>1</sup>

Public Counsel acknowledges that any true-up would likely have very little impact on Schedule 95 in this instance because PacifiCorp's Schedule 95 rate was set to zero in 2014 and REC sales revenues for 2014 were only \$6,035, which results in a very small delta between 2014 actual and forecast REC revenues. In addition, the Company is forecasting zero REC revenues for 2015. For this reason, Public Counsel does not request that the Company file a formal true-up and revision to Schedule 95 this year. Public Counsel's concern is that PacifiCorp makes no reference to the true-up requirement in its filing. Given the history of this issue<sup>2</sup> we believe it is important for the Company to acknowledge in this compliance filing that the Commission Orders

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<sup>1</sup> Order 16 at ¶31: "Pacific Power and Light must continue to make the compliance report and true-up filings required in Order 13 by May 1 of each year until relieved of this obligation." Order 16 at 25 "Order 13 required Pacific Power to file a true-up proposal on May 1, 2014." Order 13 at ¶ 3.

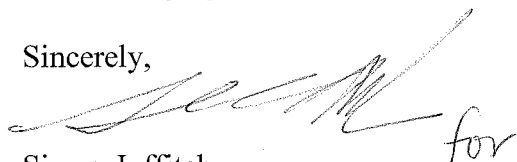
<sup>2</sup> On February 13, 2015 the Commission approved a request of the Company to recover \$4.9 million in over-credited revenues from the sale of REC revenues. The Commission also determined that PacifiCorp should have proposed a true-up mechanism at an earlier date for the over-credits which would have avoided protracted recovery of the over-credits and would have been more beneficial for ratepayers. Order 16 at ¶ 26.

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in this docket require an annual true-up filing for Schedule 95, although its effect in this case would be de minimis. Public Counsel requests PacifiCorp to file a letter in this docket acknowledging the above.

Sincerely,

A handwritten signature in black ink, appearing to read "Simon J. Ffitch", followed by the word "for" written in a smaller, cursive hand.

Simon J. Ffitch  
Senior Assistant Attorney General  
Public Counsel  
(206) 389-2055

SJf:cjb  
cc: Service List (E-mail and U.S. Mail)