



STATE OF WASHINGTON  
**UTILITIES AND TRANSPORTATION COMMISSION**  
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May 3, 2018

**NOTICE OF OPPORTUNITY TO COMMENT ON REQUIREMENT TO  
FILE ANNUAL REPORTS OF PROCEEDS FROM SALE OF  
RENEWABLE ENERGY CREDITS**

RE: *Washington Utilities and Transportation Commission v. Pacific Power & Light Company*, Docket UE-100749

TO ALL PARTIES:

On March 25, 2011, the Washington Utilities and Transportation Commission (Commission) entered Order 06 in this docket, which resolved all issues regarding the request of Pacific Power & Light Company (Pacific Power or Company) for a general rate increase except for certain issues regarding the appropriate treatment of the proceeds from the Company's sale of Renewable Energy Credits (RECs). The Commission concluded in that Order that those proceeds should be distributed to Pacific Power's ratepayers as a bill credit, and pending resolution of other issues, required the Company to begin crediting customers for REC sales proceeds based on a forecast of future REC sales proceeds, subject to true-up to actual amounts Pacific Power received.

On February 12, 2013, the Commission entered Order 13, paragraph 8 of which provides,

Beginning in 2014 unless the Commission adopts a different mechanism for crediting ongoing REC sales proceeds to customers, [the Company] must make the annual report and true-up filing contemplated in Order 06 by January 31 of each year. That filing must include (a) the actual REC sales proceeds attributable to Washington that [the Company] received during the prior calendar year; (b) the total amount of Schedule 95 credits the Company provided to its customers during that calendar year; (c) a forecast of the REC sales proceeds attributable to Washington that [the Company] reasonably anticipates receiving during the upcoming calendar year; and (d) any proposed revision to the credit rate in Schedule 95 to be in effect during the upcoming calendar year.

On December 12, 2014, the Commission entered Order 16, which in paragraph 31 provides that the “Company must continue to make the compliance and true-up filings required in Order 13 by May 1 of each year until relieved of this obligation.”

Pacific Power has made these compliance filings by May 1 of each subsequent calendar year. In its May 1, 2015, filing, the Company represented,

Starting in 2016, the Washington [Renewable Portfolio Standards] compliance requirement will be raised to nine percent of average Washington retail load. The Company’s Washington-allocated RECs will be insufficient to meet this compliance requirement. As a result, the Company anticipates that Washington-allocated RECs from 2015 forward will be used for compliance and not available for sale. Accordingly, no Washington-allocated REC revenue is projected for 2015. (Footnote omitted.)

Consistent with this representation, Pacific Power reported in its 2016, 2017, and 2018 filings that the Company has not received any REC sales proceeds attributable to Washington consumers and does not anticipate receiving any such sales proceeds.

The Commission sees no benefit in continuing to require Pacific Power to make annual reports that simply repeat that the Company is not receiving, and does not anticipate receiving, proceeds from the sale of RECs attributable to Washington. Accordingly, the Commission on its own motion is considering whether to relieve Pacific Power of the obligation to make the annual report compliance filings required in Orders 6, 13, and 16. The Commission seeks comment from the parties on this issue.

**THE COMMISSION GIVES NOTICE That parties may file comments by 5:00 p.m. on Friday, May 18, 2018, on whether the Commission should relieve Pacific Power of the obligation to file the annual reports on REC sales proceeds that the Commission required in Orders 6, 13, and 16.**

*/s/ Gregory J. Kopta*

GREGORY J. KOPTA  
Administrative Law Judge