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State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

May 17, 2018

**SENT VIA UTC WEB PORTAL**

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

Re: *Washington Utilities and Transportation Commission v. Pacific Power & Light Co.*,  
Docket UE-100749, Comments of Public Counsel Unit in response to the Commission's  
Notice of Opportunity to Comment on Requirement to File Annual Reports on Proceeds  
from Sale of Renewable Energy Credits

Dear Mr. Johnson:

Public Counsel files these comments pursuant to the Utilities and Transportation Commission's (Commission) Notice of Opportunity to Comment (Notice) in Docket UE-100749. The Commission, on its own motion, is considering whether to relieve Pacific Power & Light (Pacific Power or Company) of its obligation to submit an annual compliance filing, as required by Orders 6, 13, and 16, to report the proceeds attributable to Washington customers from sales of its Renewable Energy Credits (RECs).

Public Counsel agrees with the Commission that there is no benefit in continuing to require Pacific Power to make annual reports that state that the Company is not receiving, nor anticipates receiving, proceeds from the sale of RECs. It is possible, however, that the status of Pacific Power's RECs may change in the future, and the Commission should not completely relieve the Company of its obligation to submit these reports. Public Counsel recommends that the



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Commission instead modify its previous orders to allow Pacific Power to forgo the submission of a report in years that no RECs were sold or are not anticipated to be sold but require the Company to submit a report if REC sales recommence.

Sincerely,



NINA M. SUETAKE  
Assistant Attorney General  
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