



Bob Ferguson

ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division

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Via Electronic Mail

May 18, 2018

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, Washington 98504-7250

Re: *Washington Utilities and Transp. Commission v. Pacific Power & Light Company*
Docket UE-100749

Dear Mr. Johnson:

On May 3, 2018, the Washington Utilities and Transportation Commission (Commission) issued in this docket a Notice of Opportunity to Comment on whether the Commission should relieve Pacific Power of the obligation to file annual reports on Renewable Energy Credit (REC) sales proceeds that the Commission required in Orders 6, 13, and 16. The Commission raised this question on its own motion because 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.

Staff supports relieving Pacific Power of the obligation to file annual reports on REC sales proceeds. Pacific Power represents in its cover letter to this year's compliance filing that its Washington-allocated RECs will be insufficient to meet this compliance requirement going forward. Its 2017 Renewable Energy Report supports this representation. As a result, Staff anticipates that Washington-allocated RECs each year will be used for compliance and not available for sale. Accordingly, no Washington-allocated REC revenue is anticipated in the short- or medium-term. If this circumstance changes, any REC sales proceeds can be accounted for and allocated appropriately to customers in a general rate case.

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In addition to its support of the Commission's motion here, Staff would like to express its general support for discontinuing compliance filings that are no longer relevant. Staff encourages Pacific Power, and other public service companies, to make similar motions to the Commission motion here when they identify a compliance filing that is no longer necessary or relevant.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher M. Casey", written over a horizontal line.

CHRISTOPHER M. CASEY
Assistant Attorney General

CMC/klg
cc: Parties