

UTC Comment form for Energy Independence Act Rulemaking, WAC 480-109, Docket UE-131723

Submit this form by 5 PM Monday, Dec. 2, 2013 via the Commission's Web portal at www.utc.wa.gov/e-filing or by e-mail to records@utc.wa.gov.

Comments on behalf of: Industrial Customers of Northwest Utilities Commenter: Joshua D. Weber E-mail: jdw@dvclaw.com Phone: 503.241.7242

Name of Organization or "self"

In the first column, fill in the section or subsection of interest in the rule. In the next columns provide the specific text, proposal for change, and rationale.

Comment 1	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109-040(1)(b)(ii)		Industrial Customers of Northwest Utilities ("ICNU") supports the removal of the Council Calculator as a method for development of a utility's conservation potential assessment.	The calculator is unnecessary, outdated, and not used by any utility.

Comment 2	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109-010(2)(a)		ICNU has no specific suggestions at this time, but will review and comment on any changes suggested by other parties.	

Comment 3	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109-040(1)(a)		ICNU has no suggested text, but is interested in any suggestions of other parties.	ICNU believes consistent standards and reports could be useful. Conservation Resources Advisory Group and other advisory groups may be best situated to develop any such standards.

Comment 4	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109-040(1)(d)		<p>ICNU recommends that the Parties and the Commission develop a uniform methodology for determining “incremental costs.” In addition to capacity and energy, incremental costs should include the cost of balancing and ancillary services required to integrate variable renewable resources into a utility’s generation fleet. The methodology adopted by the Commission should apply to all utilities regulated by the Commission.</p>	<p>ICNU believes that any integration costs of variable renewables must be included in incremental costs. If integration costs are not included, then the Commission’s methodology will not reflect the true cost of renewable resources. These integration costs should also be transparent because utilities are currently recovering them from customers.</p> <p>The current varied methods for calculating incremental costs used by each utility prevents the Commission, stakeholders, and policy makers from developing a clear and accurate understanding of how renewable targets are functioning.</p>

Comment 5	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109-040		<p>ICNU supports efforts to make methods or documentation regarding incremental efficiency resources from hydroelectric plants consistent between state departments.</p>	

Comment 6	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109-040		ICNU will review and comment individually on any proposals to place specific requirements articulated in Commission Orders into the rules.	In response to Commissioner Goltz's question, ICNU is not opposed, in principle, to codifying in rule requirements and/or conditions for approval of utility targets or reports that the Commission has established by order.

Comment 7	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109- <u> </u>			

Comment 8	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109- <u> </u>			

Comment 9	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109- 			

Comment 10	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109- 			