

July 17, 2019

**VIA ELECTRONIC FILING**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503

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**RE: Advice 19-03—Replacement Pages**

On June 13, 2019, Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, submitted revised tariff sheets for Schedule 135—Net Metering Service. In response to feedback from Washington Utilities and Transportation Commission staff, Pacific Power is submitting revised tariff sheets for Schedule 135 and a revised Interconnection Agreement for Net Metering Service.

The company's current Schedule 135 tariff assigns an Aggregation Basic Charge to aggregated meters that receive credits from a designated meter that is physically attached to a net metering system. This additional Basic Charge is \$7.75 per meter for residential customers. Instead of an additional Basic Charge being assessed to these meters, the company proposes that aggregated meters pay a \$3 Aggregation Charge, which is based on cost.

For Pacific Power's billing system, processing net metering aggregation is a manual process that requires incremental employee time to enable a customer's choice to aggregate meters under the net metering program for billing purposes. To develop the proposed Aggregation Charge, the company analyzed the average time for handling the billing for an aggregated meter, and calculated the charge based on the cost to perform this service. It is fair, reasonable, and in the public interest that the customer who causes this cost should pay for it instead of all customers generally. Additionally, by reducing the cost from an additional Basic Charge to the Aggregation Charge, customers currently participating in net metering aggregation will benefit and pay a lower charge. Lowering this charge decreases the barriers for customers to participate in this program and is consistent with the state policies of encouraging investment in renewable energy resources and continuing the diversification of the energy resources used in this state.<sup>1</sup>

Please direct questions to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

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<sup>1</sup> See RCW 80.60.005

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Sincerely,

/s/

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Enclosures

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