



## Department of Commerce

Innovation is in our nature.

January 22, 2013

### Energy Independence Act (EIA) **Advisory Opinion**

F.H. Stoltze Land & Lumber Co.  
Chuck Roady  
P.O. Box 1429  
Columbia Falls, MT 59912  
croady@stoltzelumber.com

**RE: Stoltze Biomass Combined Heat & Power Facility (Flathead County, Montana)**

Mr. Roady:

F.H. Stoltze Land & Lumber Co. requested an advisory opinion, pursuant to RCW 19.285.045, as to whether the Stoltze Biomass Combined Heat & Power Facility (the "Facility") would qualify as an "eligible renewable resource" under RCW 19.285.040(2)(a) and whether the Facility would qualify as "distributed generation" under RCW 19.285.040(2)(b). The opinion that follows is limited to the Facility described in the application and Stoltze's response to requests for additional documentation.

Commerce received the application on November 5, 2012 and determined the need for more detail. Stoltze supplemented its application and on December 4, 2012, Commerce confirmed the application was sufficient and initiated the 90-day review period provided for in RCW 19.285.045(2). No comments were received from interested parties during the 30-day public comment period ending January 4, 2012. The attorney general completed legal review on January 14, 2013. Commerce consulted with Washington Utilities and Transportation Commission (UTC) staff in review of the application; however, this does not represent an advisory opinion of the UTC.

#### **Advisory Opinion**

Based on the information in the application and Stoltze's subsequent response to information requests, it is the opinion of Commerce that:

1. Electricity generated by the Facility qualifies as an eligible renewable resource for the purposes of RCW 19.285.040(2)(a), so long as, and to the extent that, the Facility is fueled by biomass energy that meets the definition in RCW 19.285.030(3).
2. The eligible renewal resource qualifies as distributed generation for the purposes of RCW 19.285.040(2)(b).

#### **Analysis and Consultation**

The application states that the Facility is a 2.5 MW combined heat and power facility located in Columbia Falls, Montana and that the Facility will use biomass energy to generate electricity. The biomass feedstock will be sawmill byproducts.

### **Qualification as an Eligible Renewable Resource**

The Facility qualifies as an eligible renewable resource based on the following representations:

1. The Facility is located in Flathead County, Montana, which is in the Pacific Northwest. RCW 19.285.030(11)(a)(i).
2. The Facility's feedstock of sawmill byproducts consists of "organic by-products of pulping and the wood manufacturing process" which qualify as biomass energy. RCW 19.285.030(3)(a).
3. The Facility's feedstock will not include material excluded from the definition of biomass energy, such as: (i) wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol, or copper-chrome-arsenic; (ii) wood from old growth forests; or (iii) municipal solid waste. RCW 19.285.030(3)(b).

This conclusion is based and conditioned on the applicant's representation that the Facility will be fueled exclusively by biomass energy and will not use any of the materials listed in RCW 19.285.030(3)(b).

### **Qualification as Distributed Generation**

The Facility qualifies as distributed generation for purposes of RCW 19.285.040(2)(b) based on the following representations:

1. The Facility is an eligible renewable resource.
2. The electrical capacity of the Facility is 2.5 MW, which is less than 5 MW. RCW 19.285.030(10).
3. The Facility is not part of an integrated cluster of generating facilities with an aggregate capacity of more than 5 MW. RCW 19.285.030(10).

An additional necessary condition is that a Washington utility owns or has contracted for the generation and the associated renewable energy credits of the Facility or has contracted to purchase the associated renewable energy credits.

If Stoltze sells renewable energy credits from its biomass project to a Washington State investor owned utility (IOU), the UTC shall determine what documentation is required to support the IOU's claims for eligibility, and may conduct its own additional analysis. If the circumstances of RCW 34.05.240 are met, Stoltze may petition the UTC for a declaratory order determining whether the project is an eligible renewable resource.

## **Relevant Sections of the Energy Independence Act**

### **RCW 19.285.030**

**(3)(a)** "Biomass energy" includes: (i) Organic by-products of pulping and the wood manufacturing process; (ii) animal manure; (iii) solid organic fuels from wood; (iv) forest or field residues; (v) untreated wooden demolition or construction debris; (vi) food waste and food processing residuals; (vii) liquors derived from algae; (viii) dedicated energy crops; and (ix) yard waste.

**(3)(b)** "Biomass energy" does not include: (i) Wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol, or copper-chrome-arsenic; (ii) wood from old growth forests; or (iii) municipal solid waste.

(10) "Distributed generation" means an eligible renewable resource where the generating facility or any integrated cluster of such facilities has a generating capacity of not more than five megawatts.

(11) "Eligible renewable resource" means: (a) Electricity from a generation facility powered by a renewable resource other than freshwater that commences operation after March 31, 1999, where: (i) The facility is located in the Pacific Northwest; or (ii) the electricity from the facility is delivered into Washington state on a real-time basis without shaping, storage, or integration services; (b) Incremental electricity produced as a result of efficiency improvements completed after March 31, 1999, to hydroelectric generation projects owned by a qualifying utility and located in the Pacific Northwest or to hydroelectric generation in irrigation pipes and canals located in the Pacific Northwest, where the additional generation in either case does not result in new water diversions or impoundments; and (c) Qualified biomass energy.

(20) "Renewable resource" means: (a) Water; (b) wind; (c) solar energy; (d) geothermal energy; (e) landfill gas; (f) wave, ocean, or tidal power; (g) gas from sewage treatment facilities; (h) biodiesel fuel as defined in RCW 82.29A.135 that is not derived from crops raised on land cleared from old growth or first-growth forests where the clearing occurred after December 7, 2006; or (i) biomass energy.

**RCW 19.285.040**

(2)(b) A qualifying utility may count distributed generation at double the facility's electrical output if the utility: (i) Owns or has contracted for the distributed generation and the associated renewable energy credits; or (ii) has contracted to purchase the associated renewable energy credits.

If you have questions, please contact Meg O'Leary at [meg.oleary@commerce.wa.gov](mailto:meg.oleary@commerce.wa.gov) or (360) 725-3121.

Regards,

  
\_\_\_\_\_  
**Tony Usibelli, Director, State Energy Office**  
WASHINGTON STATE DEPARTMENT OF COMMERCE

## Blackmon, Glenn (COM)

---

**From:** Blackmon, Glenn (COM)  
**Sent:** Tuesday, December 17, 2013 4:46 PM  
**To:** Usibelli, Tony (COM)  
**Cc:** O'Leary, Meg (COM)  
**Subject:** RE: Stoltze Lumber - addition of WA-eligible indicator

<corrected to say the plant is in Montana>

On January 22, 2013 Commerce issued an [advisory opinion](#) that the Stoltze Lumber biomass generating facility in Montana was an eligible renewable resource under the Washington Energy Independence Act.

At that time, Stoltze Lumber has not registered the project as a generating unit in WREGIS, and Commerce was not yet designating projects as Washington-eligible in its role as state administrator for WREGIS.

The Stoltze project is now registered in WREGIS, and I added the Washington indicator to its record in WREGIS. As a result, RECs created from this project will now carry the Washington-eligible tag. The basis for this designation is the original opinion from January. Stoltze did not submit a new application and was not required to pay an additional advisory opinion fee.

Glenn Blackmon  
WA Department of Commerce – State Energy Office  
Olympia, WA  
360 725-3115



APPLICATION | Energy Independence Act (EIA) Advisory Opinion

What is the EIA advisory opinion process? Through this process, Commerce helps determine whether an electric generation project or conservation resource proposed by consumer-owned utilities or individuals qualifies to meet a target under RCW 19.285.040. The final decision regarding whether to adopt the advisory opinion on the eligibility of a project or resource for a qualifying utility is made by the utility's governing board. Investor-owned utilities seeking a formal opinion can petition the Washington Utilities and Transportation Commission (UTC) for a declaratory order. For more details, refer to Senate Bill 6414 and Energy Independence Act Chapter 19.285 RCW.

How long does it take? What will it cost? The 90-day process begins when Commerce receives a completed application. Basic inquiries: Onetime \$1,250 application fee (checks payable to Department of Commerce) covers basic technical and legal consulting services required by the statute and typically results in a signed advisory opinion issued within 90 days of receipt of complete application. Inquiries requiring additional consultation: Onetime \$1,250 application fee plus a variable fee (\$62.50 per hour for Commerce review plus any additional consultant fees) will be charged for applications requiring additional analysis. Commerce will provide a cost estimate. The signed advisory opinion is typically issued within 90 days of receipt of complete application. Commerce will notify applicant if opinion process is anticipated to take more than 90 days and will provide a time estimate for completion.

How do I apply? Applications are accepted on a rolling basis beginning June 7, 2012. Complete this form and include any supporting documentation that will help us understand your proposed project or resource. Obtain a director-level signature and email to EIA@commerce.wa.gov. Direct questions to EIA@commerce.wa.gov.

EIA ADVISORY OPINION APPLICATION FORM – 2012

Table with application details including date (October 26, 2012), project name (Stoltze Biomass Combined Heat & Power Facility), inquiry type (Renewables), legal references (RCW 19.285.030, etc.), organization (F.H. Stoltze Land & Lumber Co.), contact name (Chuck Roady), phone (406-892-7000), email (croady@stoltzelumber.com), and mailing address (P.O. Box 1429 Columbia Falls, MT 59912).



# Department of Commerce

Innovation is in our nature.

If your inquiry relates to **Renewables**, complete this section.

Facility County:	Flathead
Facility State:	Montana
Utility to which Facility is interconnected:	Flathead Electric Cooperative
Balancing authority or reporting entity:	Bonneville Power Administration
Date Facility Commenced Operation:	Expected COD 10/1/13
Generator Technology:	Steam turbine-generator
Nameplate Capacity:	2.5MW
Multi-Fuel Generator? (Yes / No)	No
Eligible Renewable Resource Fuel Type:	Biomass
Other Fuels, if applicable:	N/A
Customer Sited Distributed Generation? (Yes / No)	Yes

**Describe your question.** Provide sufficient detail to ensure an efficient and comprehensive analysis. Add lines or attach supporting documents as necessary. Stoltze Land & Lumber is constructing a 2.5MW nameplate biomass-fueled combined heat & power facility at its sawmill in Columbia Falls, MT, with the entire output sold to Flathead Electric Cooperative(FEC), a BPA customer. Through its agreement with FEC, Stoltze is able to sell the Renewable Energy Credits (REC's) into Washington state as Distributed Generation, allowing the credits to be doubled by the purchasing utility when used for Renewable Energy Standard (RES) compliance. The fuel for the facility is mill byproducts from the sawmill.

Stoltze wishes to have a verification done that the following are all true with respect to its facility:

1. The facility is located in the Pacific Northwest
2. The fuel used allows the facility to be an eligible renewable resource
3. The size of the facility is such that its output qualifies as Distributed Generation
4. The REC's sold from the facility would qualify for doubling when used for RES compliance by a Washington utility

The purpose of this inquiry is to obtain an EIA Advisory Opinion that can be supplied to utilities which may be considering the purchase of REC's from the facility.

**What is your interpretation based on the Energy Independence Act?** If you believe your project or resource qualifies to meet a target under RCW 19.285.040, explain why.

The Stoltze project is of a size (2.5MW), location (Flathead County, MT), and fuel (biomass from mill byproducts) that allow the project to be an Eligible Renewable Resource and the REC's produced from the facility to count as Distributed Generation when used for compliance with the EIA by a Washington utility.



# Department of Commerce

Innovation is in our nature.

**Include any other relevant project information necessary to support our efficient analysis.**

N/A

*I certify that the information provided on this application is accurate and I have the appropriate signature authority to initiate the EIA advisory opinion process on behalf of my organization.*

Charles W. Rorady for: F.H. Stolte LUMBER Co.

Print your name here

Charles W. Rorady Vice President

Sign here



# F.H. STOLTZE LAND & LUMBER COMPANY

*Lumber Manufacturers*

Box 1429 Columbia Falls, MT 59912  
Phone (406) 892-7005 Fax (406) 892-1612  
[www.stoltzelumber.com](http://www.stoltzelumber.com)

December 18, 2012

Meg O'Leary and Chuck Murray  
State Energy Office  
Washington Department of Commerce  
1011 Plum St SE  
PO Box 42525  
Olympia, WA 98504-2525



Dear Ms. O'Leary and Mr. Murray,

Please consider the following as response to your inquiry to confirm the fuel source for the F.H. Stoltze Land & Lumber Co. biomass fired CHP plant is compliant with RCW 19.285.030 renewable resource and qualified biomass definitions:

Bark, sawdust, shavings and wood chips (mill residuals) that are produced in the processing of raw logs into lumber at our Stoltze facility, will be the primary biomass fuel supply. Procurement of sawlogs to supply the Stoltze sawmill is certified to the Sustainable Forestry Initiative® (SFI®) Fiber Sourcing Standards 2010-2014. The SFI program has 14 principles designed to achieve sustainable forestry. Detailed procurement records are maintained as is additional documentation sufficient to meet the rigors of third party certification through SFI. Any additional fuel over and above the mill residuals will be procured under the SFI Fiber Sourcing process already in place for sawlog procurement. Please note, we will not utilize any fuel from wood treated with chemicals or preservatives and/or municipal waste.

Historically, +/- 60% of the sawlogs for the Stoltze mill are sourced from private lands. +/-30% is sourced from US Forest Service and an additional +/-10% from State of Montana Trust lands. In 2011, we purchased a significant percentage of our total sawlog volume from forest land third party certified as sustainable through either the American Tree Farm System (ATFS) or SFI. This includes roughly 20% sourced from Stoltze company lands which are certified through ATFS.

The Stoltze SFI certified procurement system includes specific and documented measures to ensure contractors and landowners receive information on management of Forests of Exceptional Conservation Value (FECV's), forests which could include forest stands with old growth characteristics. Old growth forests are neither defined nor identified on private lands in Montana. Between wide spread stand replacing fire activity in 1910 and 1929 and widespread forest management over the last 100 years, private lands within our sourcing area are generally second growth, younger stands exhibiting few if any old growth characteristics. USFS and



Member Since 1966



Charter Member

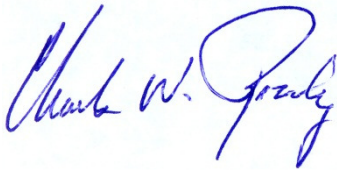


Montana State Trust Lands are specifically managed with objectives to conserve and promote old growth stand characteristics across their landscapes.

Stoltze supports and promotes sustainable forest management on all lands and is committed to responsible fiber sourcing practices through a process of using certified logging professionals, BMP training programs, and educational outreach to landowners and wood suppliers on critical wildlife habitat, threatened and endangered species, FECV's and the importance of biodiversity across the landscape.

Please do not hesitate to contact me with additional questions or request for information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chuck W. Roady". The signature is fluid and cursive, with the first name "Chuck" being the most prominent.

Chuck Roady  
Vice President and General Manager



STATE OF WASHINGTON  
DEPARTMENT OF COMMERCE  
1011 Plum Street SE • PO Box 42525 • Olympia, Washington 98504-2525 • (360) 725-4000  
[www.commerce.wa.gov](http://www.commerce.wa.gov)

August 15, 2013

Robert Buchan  
Cosmo Specialty Fibers, Inc.  
PO Box 539  
Cosmopolis WA 98537

Energy Independence Act (EIA) Advisory Opinion

**RE: Application 2013-008 Cosmo Specialty Fibers Cogeneration**

Dear Mr. Buchan:

Cosmo Specialty Fibers, Inc. submitted an application for an advisory opinion pursuant to RCW 19.285.045, which allows a person proposing a renewable resource to obtain an advisory opinion on whether the resource qualifies to meet a target under RCW 19.285.040. Cosmo has asked if the Cosmo Specialty Fibers Cogeneration facility (the "Facility") qualifies as an eligible renewable resource.

Cosmo submitted the application on July 8, 2013, and at the request of Commerce, provided supplemental information on July 15, 2013. On July 16, 2013, Commerce determined that the application was complete and initiated the 90-day review. No comments were received during the 30-day public comment period ending August 15, 2013.

The attorney general representing Commerce completed legal review on August 13, 2013.

**Advisory Opinion**

Based on the information in the application, it is the opinion of Commerce that electricity generated by the Facility qualifies as an eligible renewable resource for the purposes of RCW 19.285.040(2)(a), to the extent that the Facility is fueled by biomass energy that meets the definition in RCW 19.285.030(3). The Facility is a multi-fuel generator, and its electricity output is not an eligible renewable resource to the extent that it is fueled by diesel or other ineligible fuel sources.

### **Analysis and Consultation**

The Facility is a 17.2 MW steam turbine-generator facility located in Grays Harbor County, Washington. It uses biomass energy to generate electricity. Feedstocks include wood waste and organic by-products of pulping.

The Facility uses recycled diesel fuel in its operations. RCW 19.285.040(2)(g) permits a generating facility to use a combination of fossil and combustible renewable resources and to count a percentage of the electricity output in direct proportion to the percentage of the total heat value represented by the heat value of the renewable resources. The Facility is registered in the Western Renewable Energy Generation Information System (WREGIS) as a multi-fuel facility, and Cosmo documents its output based on eligible and ineligible fuel sources. Cosmo submitted records demonstrating that the use of fossil fuels is accounted for in the creation of renewable energy credits by WREGIS.

A second potential issue for Cosmo's application is the date of commercial operation of the Facility. RCW 19.285.030(11)(a) defines an eligible renewable resource as a "generation facility powered by a renewable resource other than freshwater that commences operation after March 31, 1999." The mill at the Cosmo Specialty Fibers site operated prior to 1999. However, the mill did not operate between 2006 and 2011, and the application includes information showing that Cosmo made extensive upgrades and replacements to the boilers, turbines and other components of the generating facility before starting commercial operation in 2011. This repowering of the generating facility should be used in determining the date at which it commenced operation.

### **Qualification as an Eligible Renewable Resource**

The Facility qualifies as an eligible renewable resource based on the following representations:

1. The Facility is located in Grays Harbor County, Washington, which is in the Pacific Northwest. RCW 19.285.030(11)(a)(i).
2. The Facility commenced operation after March 31, 1999. RCW 19.285.030(11)(a).
3. The Facility's feedstocks consist of organic by-products of pulping and the wood manufacturing process, which is defined as biomass energy. RCW 19.285.030(3)(a).
4. The Facility's feedstocks will not include material excluded from the definition of biomass energy, such as: (i) wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol, or copper-chrome-arsenic; (ii) wood from old growth forests; or (iii) municipal solid waste. RCW 19.285.030(3)(b).
5. The Facility documents its use of renewable and fossil feedstocks through WREGIS and receives renewable energy credits in direct proportion to the percentage of the total heat value represented by the heat value of the renewable resources. RCW 19.285.040(2)(g).

### **Designation in WREGIS**

As the Washington program administrator for WREGIS, Commerce will designate the Cosmo Specialty Fibers Cogeneration project (WREGIS generating unit IDs W2233 and W2242) as an eligible renewable facility in WREGIS.

Robert Buchan  
Cosmo Specialty Fibers, Inc.  
Application 2013-008 Cosmo Specialty Fibers Cogeneration  
Page 3 of 4

**Consultation**

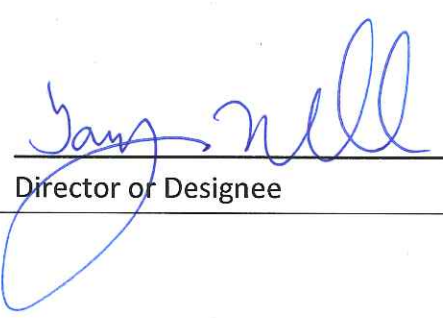
In reviewing this application, Commerce consulted with the staff of the Washington Utilities and Transportation Commission (UTC). The opinion expressed here is solely that of Commerce, as provided by RCW 19.285.045. Entities proposing to sell renewable energy or credits to an investor-owned utility may petition for a declaratory order from the UTC.

If you have questions regarding this advisory opinion, please contact Glenn Blackmon at [glenn.blackmon@commerce.wa.gov](mailto:glenn.blackmon@commerce.wa.gov) or (360) 725-3115.

Regards,



Tony Usibelli  
Director, State Energy Office

<b>WREGIS Certification</b>			
It is the opinion of the Washington Department of Commerce that the facility identified in this application meets the statutory legal standard for an eligible renewable resource as defined in RCW 19.285.030, based on the factors set out below. The facility will be designated in WREGIS as an eligible renewable resource under the Washington Energy Independence Act:			
<input checked="" type="checkbox"/>	The fuel source for the facility is identified in RCW 19.285.030 as renewable energy:		
<input type="checkbox"/>	Wind	<input type="checkbox"/>	Wave, ocean, or tidal power
<input type="checkbox"/>	Solar energy	<input type="checkbox"/>	Gas from sewage treatment facilities
<input type="checkbox"/>	Geothermal energy	<input type="checkbox"/>	Biodiesel fuel as defined in RCW 82.29A.135 that is not derived from crops raised on land cleared from old growth or first-growth forests where the clearing occurred after December 7, 2006
<input type="checkbox"/>	Landfill gas	<input checked="" type="checkbox"/>	Biomass energy
<input checked="" type="checkbox"/>	The facility commenced operation after March 31, 1999, as required by RCW 19.285.030.		
<input checked="" type="checkbox"/>	The facility is located in the Pacific Northwest, or the electricity from the facility is delivered into Washington state on a real-time basis without shaping, storage, or integration services, as required by RCW 19.285.030.		
Washington Certification Number: <b>WA2013-008</b>			
<b>WASHINGTON DEPARTMENT OF COMMERCE</b>			
 _____ Director or Designee		8/15/13 _____ Date	



# Department of Commerce

Innovation is in our nature.

[commerce.wa.gov/wregis](http://commerce.wa.gov/wregis)

Washington State

Energy Independence Act

Application for Advisory Opinion and  
Renewable Energy Facility (WREGIS)  
Certification

*All information provided in this application or any supplemental or additional materials is subject to public disclosure.*

FACILITY NAME: **Nine Canyon Wind Project**  
WREGIS Generating Unit ID: **684**

A separate Washington application is required for each generating unit with a separate WREGIS GU ID. Applicant must select Washington in WREGIS generating unit registration.

## Section 1: Agency Action Requested

Advisory Opinion and WREGIS Certification  Advisory Opinion Only

## Section 2: Applicant Information

Applicant Contact: **Jennifer Knighten**

Title: **Project Specialist**

Applicant Phone: **509-585-3677**

Applicant E-mail: **jlknighten@energy-northwest.com**

Applicant Company Name: **Energy Northwest**

Company Address: **POB 968 MD 1030**

City: **Richland**

State/Province: **WA**

Zip Code: **99352**

Country: **USA**

## Section 3: Facility Information

### Facility Owner

Name of Facility Owner:

OR  The Facility Owner is the same as the Applicant.

Address: **POB 968 MD 1030**

City/State/ZIP: **Richland, Wa 99352**

Contact Name, Phone, and Email: **Jennifer Knighten, 509-585-3677, jlknighten@energy-northwest.com**

### Facility Identification and Location

Unit Name: **Nine Canyon Wind Project**

Facility Name: **Nine Canyon Wind Project**

Unit location (street address, legal description, or GPS coordinates):

**92308 S. Nine Canyon Rd.**

City: **Kennewick**

County: **Benton County**

State/Province: **WA**

Zip: **99337**

Country: **USA**

Provide a description of the facility.

**Nine Canyon Wind Project consists of 49 Siemens 1.3 MW wind turbines, for a combined capacity of 63.7 MW. Nine Canyon Wind Project is owned and operated by Energy Northwest, a joint operating agency in the State of Washington.**

## Facility Identification Numbers

WREGIS Generating Unit ID: **684**

WA2014-005 Nine Canyon Wind ~~Other~~ External ID:

EIA Utility Code:

EIA Plant Code: **7936**

**Section 4: Facility Eligibility**

**A. Facility Profile**

Nameplate Capacity (MW): **63.7**

If this value will change, please explain: **n/a**

Commercial Operation Date (COD): **9 / 1 / 2002**

Is your facility considered repowered by WREGIS?  Yes  No

If yes, please explain:

**B. Facility Fuel**

Indicate each energy source used by the facility. For definitions, refer to RCW 19.285.030. For multi-fuel generating facilities indicate all fuels used.

<input checked="" type="checkbox"/>	Wind	<input type="checkbox"/>	Wave power
<input type="checkbox"/>	Solar energy	<input type="checkbox"/>	Ocean power
<input type="checkbox"/>	Geothermal energy	<input type="checkbox"/>	Tidal power
<input type="checkbox"/>	Landfill gas	<input type="checkbox"/>	Gas from sewage treatment facility
<input type="checkbox"/>	Biomass energy (must complete Section 5)	<input type="checkbox"/>	Biodiesel fuel (must complete Section 6)
<input type="checkbox"/>	Other (please specify):		

Will the facility use any fossil fuel or other non-qualifying fuel?  Yes  No

- Type of fossil fuel or other non-qualifying fuel:
- Average annual amount of non-qualifying fuel used (percent of net heat input):

**Section 5: Biomass Energy Supplement (complete only if "biomass energy" is checked in Section 4)**

**Allowed Fuel Sources.** Indicate each source of biomass energy used by the facility.

<input type="checkbox"/>	Organic by-products of pulping and the wood manufacturing process	<input type="checkbox"/>	Food waste and food processing residuals
<input type="checkbox"/>	Animal manure	<input type="checkbox"/>	Liquors derived from algae
<input type="checkbox"/>	Solid organic fuels from wood	<input type="checkbox"/>	Dedicated energy crops
<input type="checkbox"/>	Forest or field residues	<input type="checkbox"/>	Yard waste
<input type="checkbox"/>	Untreated wooden demolition or construction debris		

**Prohibited Fuel Sources.** The following materials will NOT be used as a source of biomass energy by the facility.

<input type="checkbox"/>	Wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol, or copper-chrome-arsenic	<input type="checkbox"/>	Wood from old growth forests
		<input type="checkbox"/>	Municipal solid waste

**Legacy Biomass.** The Washington Energy Independence Act allows a biomass energy facility commencing operation before March 31, 1999 to qualify as an eligible renewable resource in certain circumstances. Contact Commerce to obtain application requirements.

**Section 6: Biodiesel Fuel Supplement (complete only if "biodiesel fuel" is checked in Section 4)**

The biodiesel fuel used by the facility meets each of the identified conditions:

- |                          |   |
|--------------------------|---|
| <input type="checkbox"/> | The fuel (a) is a mono alkyl ester of long chain fatty acids derived from vegetable oils or animal fats for use in compression-ignition engines and (b) meets the requirements of the American society of testing and materials specification D 6751 in effect as of January 1, 2003. |
| <input type="checkbox"/> | The fuel is NOT from crops raised on land cleared from old growth or first-growth forests where the clearing occurred after December 7, 2006  |

**Section 7: Eligibility for Washington Multipliers (Optional)**

The facility qualifies for the following multipliers under the Washington Energy Independence Act:

- |                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>Distributed Generation.</b> The facility has a generating capacity of 5 MW or less and is not part of any integrated cluster of facilities with an aggregate generating capacity of 5 MW or more.       |
| <input type="checkbox"/> | <b>Apprentice Labor.</b> The facility commenced operation after December 31, 2005 and in construction used an apprenticeship program approved by the Washington State Apprenticeship and Training Council. |

**NOTE:** Commerce requests optional multiplier eligibility from facility owners for informational purposes only. Owners seeking certification of a facility as eligible for a multiplier should contact Commerce for application requirements.

**Section 8: Reservation**

The Washington Department of Commerce makes a determination of resource eligibility under the Washington Energy Independence Act based on the information provided by the applicant and does not independently verify that information. An applicant must promptly notify Commerce of any changes to the information submitted for certification that may affect the facility's eligibility. Commerce reserves the right to modify or withdraw a designation if it determines that the information supplied by the applicant was incomplete or inaccurate.

**Section 9: Attestation**

I declare that the information provided in this application and any supplemental forms and attachments are true and correct to the best of my knowledge, that the information contained in this submission is consistent with information on file with WREGIS unless otherwise indicated, that no information materially affecting the facility's eligibility has been withheld, and that I am authorized to file this submission on the facility owner's behalf.

Signature: 

Date Signed: 4/15/2014

Authorized Officer/Agent: **Matt Weyh**

Officer Title and Company: **Project Supervisor, Energy Northwest**

Name of Facility: **Nine Canyon Wind Project**



**Application Checklist for Submission** WA2014-005 Nine Canyon Wind Project

Applicants must select the Washington program administrator in the generating unit's WREGIS static data.

Applicants should ensure that the following documents are provided:

1. Electronic copy of general RPS application, including a signed attestation page.
2. WREGIS "static data." A printout of your generator account profile screen in WREGIS.
3. Optional project background documentation. Background documentation can be submitted or published in regulatory settings (FERC or state commission filings) or informal forums (websites, articles or factsheets).
4. Payment of advisory opinion fee of \$1,250. A separate application and application fee are required for each generating unit. However, if a facility owner has multiple WREGIS generating unit IDs for a single facility and all the static characteristics of the facility (other than the generating capacity) are identical, it may request that Commerce treat the combined generating units as a single application. The owner must document at the time of application that all GU IDs are part of a single facility in a single location. If GU IDs are added later, a separate application will be required.

To submit your facility for certification, e-mail the application and any supplemental materials listed above to ([wregis@commerce.wa.gov](mailto:wregis@commerce.wa.gov)). Submit payment of the advisory opinion fee to:

Department of Commerce  
Attn: State Energy Office  
P.O. Box 42525  
Olympia, WA 98504-2525

Commerce will post each application on its website. Applications are subject to a public comment period.

**Section 10: Advisory Opinion and WREGIS Certification (to be completed by Commerce)**

It is the opinion of the Washington Department of Commerce that the facility identified in this application meets the statutory legal standard for an eligible renewable resource as defined in RCW 19.285.030, based on the factors set out below. The facility will be designated in WREGIS as an eligible renewable resource under the Washington Energy Independence Act:

Facility Name:		WREGIS GU ID:	
----------------	--	---------------	--

<input checked="" type="checkbox"/>	The fuel source for the facility is identified in RCW 19.285.030 as renewable energy:		
<input checked="" type="checkbox"/>	Wind	<input type="checkbox"/>	Wave, ocean, or tidal power
<input type="checkbox"/>	Solar energy	<input type="checkbox"/>	Gas from sewage treatment facilities
<input type="checkbox"/>	Geothermal energy	<input type="checkbox"/>	Biodiesel fuel as defined in RCW 82.29A.135 that is not derived from crops raised on land cleared from old growth or first-growth forests where the clearing occurred after December 7, 2006
<input type="checkbox"/>	Landfill gas	<input type="checkbox"/>	Biomass energy

<input checked="" type="checkbox"/>	The facility commenced operation after March 31, 1999, as required by RCW 19.285.030.
-------------------------------------	---

<input checked="" type="checkbox"/>	The facility is located in the Pacific Northwest, or the electricity from the facility is delivered into Washington state on a real-time basis without shaping, storage, or integration services, as required by RCW 19.285.030.
-------------------------------------	--

Washington Certification Number: **WA2014-005**

WASHINGTON DEPARTMENT OF COMMERCE

*Yang Hill* 5/12/14  
 Director or Designee Date


[Logout](#)
[My Account](#)
[Customize My Page](#)

Energy Northwest - ninecanyon

4/29/2014 8:02:17 AM

[Change Password](#)

## Generator Information

### Facility ID, Name and Location Information

WREGIS GU ID:	684
Generating Unit Name: *	<input type="text" value="Nine Canyon Wind Proj"/>
External Unit ID: *	<input type="text" value="EIA 860 Plant Code - 7936"/> <small>(optional for class I and class J generators)</small> <input type="button" value="View External Unit ID Info"/>
Facility Owner Name: *	<input type="text" value="Energy Northwest"/>
Primary Facility Name: *	<input type="text" value="Nine Canyon Wind Proj"/>
Secondary Facility Name:	<input type="text"/>
County: *	<input type="text" value="Benton"/>
Country: *	<input type="text" value="US"/>
State/Province: **	<input type="text" value="WASHINGTON"/> - <input type="text" value="Select One"/> <input type="text" value="WA"/>

### Engineering Information

Commenced Operation Date: *	<input type="text" value="09/01/2002"/> <small>(format: MM/DD/YYYY)</small>
Nameplate Capacity (MW): *	<input type="text" value="63.700"/> <small>(format: x.xxx)</small>
Capacity Factor: *	<input type="text" value="34"/> <small>(either Capacity Factor or Maximum Annual Energy is required)</small>
Maximum Annual Energy: *	<input type="text"/> <small>(either Capacity Factor or Maximum Annual Energy is required)</small>
Repowered Indicator:	<input type="radio"/> Yes <input checked="" type="radio"/> No
Repower Date: **	<input type="text"/> <small>(format: MM/YYYY)</small>
Facility Outside US-Defined Protected Areas:	<input type="radio"/> Yes <input checked="" type="radio"/> No

### Company Information

Company Name: *	<input type="text" value="Energy Northwest"/>
Company Street Address1: *	<input type="text"/>

WA2014-005 Nine Canyon Wind Project

	<input type="text" value="92308 S. Nine Canyon I"/>
<b>Company Street Address2:</b>	<input type="text"/>
<b>Company City: *</b>	<input type="text" value="Kennewick"/>
<b>Company Country: *</b>	<input type="text" value="US"/>
<b>Company State/Province: ****</b>	WASHINGTON <input type="text" value="Select One"/> · <input type="text" value="WA"/>
<b>Company Zip/Postal: *</b>	<input type="text" value="99337"/>
<b>Company Telephone: *</b>	<input type="text" value="509-585-3677"/> (format: if US and Canada 123-456-7890 / Mexico 011-52-12-3456-7890/all other Countries free text)
<b>Company Fax:</b>	<input type="text" value="509-585-7131"/> (format: if US and Canada 123-456-7890 / Mexico 011-52-12-3456-7890/all other Countries free text)
<b>Company Web Site URL:</b>	<input type="text" value="www.energy-northwest."/> (format: www.apx.com)
<b>Mailing Address1: *</b>	<input type="text" value="92308 S. Nine Canyon I"/> <input type="button" value="Same As Street Address"/>
<b>Mailing Address2:</b>	<input type="text"/>
<b>Mailing City: *</b>	<input type="text" value="Kennewick"/>
<b>Mailing Country: *</b>	<input type="text" value="US"/>
<b>Mailing State/Province: ****</b>	WASHINGTON <input type="text" value="Select One"/> · <input type="text" value="WA"/>
<b>Mailing Zip/Postal: *</b>	<input type="text" value="99337"/> (format: if US and Mexico 12345 / Canada a1b2c3/all other Countries free text)

**Facility Operator Information**

<b>Contact Job Title:</b>	<input type="text" value="Technical Support Spec"/>
<b>Contact Name: *</b>	<input type="text" value="Jennifer Knighten"/>
<b>Contact Mailing Address1: *</b>	<input type="text" value="92308 S. Nine Canyon I"/> <input type="button" value="Same As Company Mailing Address"/>
<b>Contact Mailing Address2:</b>	<input type="text"/>
<b>Contact City: *</b>	<input type="text" value="Kennewick"/>
<b>Contact Country: *</b>	<input type="text" value="US"/>
<b>Contact State/Province: ****</b>	WASHINGTON · <input type="text" value="Select One"/> <input type="text" value="WA"/>
<b>Contact Zip/Postal: *</b>	<input type="text" value="99337"/> (format: if US and Mexico 12345 / Canada a1b2c3/all other Countries free text)
<b>Contact Telephone: *</b>	<input type="text" value="509-585-3677"/> (format: if US and Canada 123-456-7890 / Mexico 011-52-12-3456-7890/all other Countries free text)

WA2014-005 Nine Canyon Wind Project

<b>Contact Email: *</b>	<input type="text" value="jlknighten@energy-nortl"/> (format: abc@apx.com)
<b>WREGIS Generator Class and Fuel Type / Energy Source Information</b>	
<b>WREGIS Generation Classification - Generation Reported to Balancing Authority on a unit-specific basis: *</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>WREGIS Generation Classification (cont): ***</b>	<input type="text" value="Wholesale Generation"/>
<b>WREGIS Generation Reporting Classification: *</b>	<input type="text" value="A"/>
<b>Generating Unit in WECC Region Declaration Indicator: *</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Utility to which generating unit is interconnected: *</b>	<input type="text" value="Bonneville Power Administration"/>
<b>Qualifying Facility (QF): *</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>Generation Technology / Prime Mover: *</b>	<input type="text" value="Wind"/>
<b>Fuel Type / Energy Source: *</b>	<input checked="" type="radio"/> Single Fuel <input type="radio"/> Multi Fuel <input type="text" value="Wind"/>
<b>Reporting Entity, State/Provincial/Voluntary Admin Access, and Sub-Account Assignment</b>	
<b>Reporting Entity: *</b>	<input type="text" value="Bonneville Power Administration"/>
<b>Reporting Entity Unit ID: *</b>	<input type="text" value="W684"/> (If Self-Reporting, leave this field blank.)
<b>State/Provincial/Voluntary Program Administrator:</b>	<input type="text" value="California Energy Commission"/> <input type="text" value="Colorado Public Utilities Commission"/> <input type="text" value="Green-e Energy"/> <input type="button" value="Edit State/Provincial/Voluntary Program Administrator"/>
<b>Active Sub-Account Selection: *</b>	<input type="text" value="Nine Canyon - 580"/>
<b>Ownership and Assignment of Registration Rights Information</b>	
<b>Facility Ownership Type: *</b>	Electric Wholesale Generator
<b>Assignment of Registration Rights:</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <a href="#">Assignment of Registration Rights document</a>
<b>Assignment of Registration Rights Effective Date: **</b>	<input type="text"/> (format: MM/DD/YYYY)
<b>Court-or Regulator's Assignment of Registration Rights:</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>Court-or Regulator's Assignment of Registration Rights Effective Date: **</b>	<input type="text"/> (format: MM/DD/YYYY)
<b>Metering Information</b>	
<b>Generating Unit Aggregate</b>	

WA2014-005 Nine Canyon Wind Project

<b>Metering: *</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Primary Generator: *</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Number of Generating Units Aggregating on this Meter:</b>	<input type="text" value="2"/> (readonly)
<b>Revenue Meter ID: *</b>	<input type="text" value="2683\2685\3189"/>
<b>Revenue Meter Suffix:</b>	<input type="text" value="2"/> (readonly)
<b>Revenue Meter County: *</b>	<input type="text" value="Benton"/>
<b>Revenue Meter Country: *</b>	<input type="text" value="US"/>
<b>Revenue Meter State/Province: ****</b>	WASHINGTON Select One <input type="text" value="WA"/>
<b>Optional Generating Unit Registration</b>	
<b>California Supplemental Energy Payment Received:</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>Facility Receives State/Provincial Public Benefit Fund Support Indicator:</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>Federal Tax Credits Received Indicator:</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>Hydroelectric Facility</b>	
<b>FERC Hydro License Date:</b>	<input type="text"/> (format: MM/DD/YYYY)
<b>FERC Hydro License Status (If no date provided above):</b>	Select One
* Required Field ** Required Field if "Yes" is checked above *** Required Field if "No" is checked above **** Required if US, Canada or Mexico	
<input type="button" value="Next"/> <input type="button" value="Cancel"/>	

[Privacy Policy](#)



**Department of Commerce**  
Innovation is in our nature.

[commerce.wa.gov/eia](http://commerce.wa.gov/eia)

**Washington State  
Energy Independence Act**

**Application for Advisory Opinion and  
Renewable Energy Facility (WREGIS)  
Certification**

*All information provided in this application or any supplemental or additional materials is subject to public disclosure.*

FACILITY NAME: **Sierra Pacific Burlington**  
WREGIS Generating Unit ID (if already registered): **W1491 & W2042**

A separate Washington application is required for each generating unit with a separate WREGIS GU ID. Applicant must select Washington in WREGIS generating unit registration.

**Section 1: Agency Action Requested**

Advisory Opinion and WREGIS Certification  Advisory Opinion Only

**Section 2: Applicant Information**

Applicant Contact: **David Branchcomb** Title: **Director, Power Contracting**  
Applicant Phone: **(530) 378-8412**  
Applicant E-mail: **DBranchcomb@spi-ind.com**  
Applicant Company Name: **Sierra Pacific Industries**  
Company Address: **19794 Riverside Ave.**  
City: **Anderson** State/Province: **CA**  
Zip Code: **96007** Country: **USA**

**Section 3: Facility Information**

**Facility Owner**

Name of Facility Owner:  
**OR**  The Facility Owner is the same as the Applicant.

Address:

City/State/ZIP:

Contact Name, Phone, and Email:

**Facility Identification and Location**

Unit Name: **Sierra Pacific Burlington**

Facility Name: **Sierra Pacific Burlington**

Unit location (street address, legal description, or GPS coordinates):

**14353 McFarland Rd.**

City: **Mt. Vernon**

County: **Skagit**

State/Province: **WA**

Zip: **98273**

Country: **USA**

Provide a description of the facility.

The **Sierra Pacific Burlington** facility is a **28 MW biomass cogeneration** facility located near **Mt. Vernon, Washington** that includes a mill onsite for wood manufacturing and is registered as a eligible renewable resource. The facility is located within, and is interconnected to, the **Puget Sound Energy** balancing authority. Organic by-products from the wood manufacturing process are used as the fuel source for the facility.

**Facility Identification Numbers**WREGIS Generating Unit ID: **W1491 & W2042**

Other External ID:

EIA Utility Code: **15500**EIA Plant Code: **56406****Section 4: Facility Eligibility****A. Facility Profile**Nameplate Capacity (MW): **28**

If this value will change, please explain:

Commercial Operation Date (COD): **3 / 15 / 2007**Is your facility considered repowered by WREGIS?  Yes  No

If yes, please explain:

**B. Facility Fuel**Indicate each energy source used by the facility. For definitions, refer to [RCW 19.285.030](#). For multi-fuel generating facilities indicate all fuels used.

<input type="checkbox"/>	Wind	<input type="checkbox"/>	Wave power
<input type="checkbox"/>	Solar energy	<input type="checkbox"/>	Ocean power
<input type="checkbox"/>	Geothermal energy	<input type="checkbox"/>	Tidal power
<input type="checkbox"/>	Landfill gas	<input type="checkbox"/>	Gas from sewage treatment facility
<input checked="" type="checkbox"/>	Biomass energy (must complete Section 5)	<input type="checkbox"/>	Biodiesel fuel (must complete Section 6)
<input type="checkbox"/>	Water (must complete Section 7)	<input type="checkbox"/>	Other (please specify):

Will the facility use any fossil fuel or other non-qualifying fuel?  Yes  No

- Type of fossil fuel or other non-qualifying fuel: **Natural Gas for start ups**
- Average annual amount of non-qualifying fuel used (percent of net heat input): **< 1%**

**Section 5: Biomass Energy Supplement** (complete only if "biomass energy" is checked in Section 4)**Allowed Fuel Sources.** Indicate each source of biomass energy used by the facility.

<input checked="" type="checkbox"/>	Organic by-products of pulping and the wood manufacturing process	<input type="checkbox"/>	Food waste and food processing residuals
<input type="checkbox"/>	Animal manure	<input type="checkbox"/>	Liquors derived from algae
<input checked="" type="checkbox"/>	Solid organic fuels from wood	<input type="checkbox"/>	Dedicated energy crops
<input checked="" type="checkbox"/>	Forest or field residues	<input type="checkbox"/>	Yard waste
<input type="checkbox"/>	Untreated wooden demolition or construction debris		

**Prohibited Fuel Sources.** The following materials will NOT be used as a source of biomass energy by the facility.

<input checked="" type="checkbox"/>	Wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol, or copper-chrome-arsenic	<input checked="" type="checkbox"/>	Wood from old growth forests
		<input checked="" type="checkbox"/>	Municipal solid waste

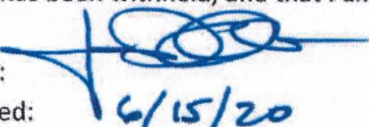
**Legacy Biomass.** The Washington Energy Independence Act allows a biomass energy facility commencing operation before March 31, 1999 to qualify as an eligible renewable resource in certain circumstances. Contact Commerce to



<b>Section 6: Biodiesel Fuel Supplement</b> (complete only if "biodiesel fuel" is checked in Section 4)	
The biodiesel fuel used by the facility meets each of the identified conditions:	
<input type="checkbox"/>	The fuel (a) is a mono alkyl ester of long chain fatty acids derived from vegetable oils or animal fats for use in compression-ignition engines and (b) meets the requirements of the American society of testing and materials specification D 6751 in effect as of January 1, 2003.
<input type="checkbox"/>	The fuel is NOT from crops raised on land cleared from old growth or first-growth forests where the clearing occurred after December 7, 2006.
<b>Section 7: Water/Hydroelectric Power</b> (complete only if "water" is checked in Section 4)	
The facility uses water as a fuel in the following manner:	
<input type="checkbox"/>	<b>Incremental Hydro.</b> Incremental electricity produced as a result of efficiency improvements completed after March 31, 1999, to hydroelectric generation projects owned by a qualifying utility and located in the Pacific Northwest where the additional generation does not result in new water diversions or impoundments.
	Date efficiency improvement completed:
	Method of measuring incremental generation:
<input type="checkbox"/>	Incremental generation is separately metered or measured.
<input type="checkbox"/>	Incremental generation is modeled each year based on actual stream flows.
<input type="checkbox"/>	Incremental generation is modeled as a fixed percentage of total generation. Fixed percentage:        %
<input type="checkbox"/>	Incremental generation is modeled as a fixed generation amount. Fixed amount:        megawatt-hours
	Note: If any box but the first is checked, the facility must register in WREGIS as a multi-fuel facility. Non-incremental generation will be classified as Large Hydro (LHN) and excluded from certificate creation.
<input type="checkbox"/>	<b>Canal or pipe.</b> Hydroelectric generation from a project completed after March 31, 1999, where the generation facility is located in irrigation pipes, irrigation canals, water pipes whose primary purpose is for conveyance of water for municipal use, and wastewater pipes located in Washington where the generation does not result in new water diversions or impoundments.
<b>Section 8: Eligibility for Washington Multipliers (Optional)</b>	
The facility qualifies for the following multipliers under the Washington Energy Independence Act:	
<input type="checkbox"/>	<b>Distributed Generation.</b> The facility has a generating capacity of 5 MW or less and is not part of any integrated cluster of facilities with an aggregate generating capacity of 5 MW or more.
<input type="checkbox"/>	<b>Apprentice Labor.</b> The facility commenced operation after December 31, 2005 and in construction used an apprenticeship program approved by the Washington State Apprenticeship and Training Council.
<b>NOTE:</b> Commerce requests optional multiplier eligibility from facility owners for informational purposes only. Owners seeking certification of a facility as eligible for a multiplier should contact Commerce for application requirements.	
<b>Section 9: Reservation</b>	
The Washington Department of Commerce makes a determination of resource eligibility under the Washington Energy Independence Act based on the information provided by the applicant and does not independently verify that information. An applicant must promptly notify Commerce of any changes to the information submitted for certification that may affect the facility's eligibility. Commerce reserves the right to modify or withdraw a designation if it determines that the information supplied by the applicant was incomplete or inaccurate.	

### Section 10: Attestation

I declare that the information provided in this application and any supplemental forms and attachments are true and correct to the best of my knowledge, that the information contained in this submission is consistent with information on file with WREGIS unless otherwise indicated, that no information materially affecting the facility's eligibility has been withheld, and that I am authorized to file this submission on the facility owner's behalf.

Signature: 

Date Signed: 6/15/20

Authorized Officer/Agent: **Jon Gartman**

Officer Title and Company: **Secretary / Sierra Pacific Industries**

Name of Facility: **Sierra Pacific Burlington**

### Application Checklist for Submission

Applicants must select the Washington program administrator in the generating unit's WREGIS static data.

Applicants should ensure that the following documents are provided:

1. Electronic copy of entire application, including a signed attestation page.
2. WREGIS "static data" if the facility is already registered in WREGIS. A printout of your generator account profile screen in WREGIS.
3. Optional project background documentation. Background documentation can be submitted or published in regulatory settings (FERC or state commission filings) or informal forums (websites, articles or factsheets).
4. Payment of advisory opinion fee of **\$1,250**. A separate application and application fee are required for each generating unit. However, if a facility owner has multiple WREGIS generating unit IDs for a single facility and all the static characteristics of the facility (other than the generating capacity) are identical, it may request that Commerce treat the combined generating units as a single application. The owner must document at the time of application that all GU IDs are part of a single facility in a single location. If GU IDs are added later, a separate application will be required.

To submit your facility for certification, e-mail the application and any supplemental materials listed above to ([wregis@commerce.wa.gov](mailto:wregis@commerce.wa.gov)). Submit payment of the advisory opinion fee to:

Department of Commerce  
Attn: State Energy Office  
P.O. Box 42525  
Olympia, WA 98504-2525

Commerce will post each application on its website. Applications are subject to a public comment period.

**Advisory Opinion and WREGIS Certification (to be completed by Commerce)**

It is the opinion of the Washington Department of Commerce that the facility identified in this application meets the statutory legal standard for an eligible renewable resource as defined in RCW 19.285.030, based on the factors set out below. The facility will be designated in WREGIS as an eligible renewable resource under the Washington Energy Independence Act:

Facility Name:	Sierra Pacific Burlington	WREGIS GU ID:	W1491, W2042
----------------	---------------------------	---------------	--------------

<input checked="" type="checkbox"/>	The fuel source for the facility is identified in RCW 19.285.030 as renewable energy:		
<input type="checkbox"/>	Wind	<input type="checkbox"/>	Wave, ocean, or tidal power
<input type="checkbox"/>	Solar energy	<input type="checkbox"/>	Gas from sewage treatment facilities
<input type="checkbox"/>	Geothermal energy	<input type="checkbox"/>	Biodiesel fuel
<input type="checkbox"/>	Landfill gas	<input checked="" type="checkbox"/>	Biomass energy
<input type="checkbox"/>	Water (incremental efficiency hydro)	<input type="checkbox"/>	Water (pipe or canal)

The facility commenced operation after March 31, 1999, as required by RCW 19.285.030.

The facility is located in the Pacific Northwest, or the electricity from the facility is delivered into Washington state on a real-time basis without shaping, storage, or integration services, as required by RCW 19.285.030.

Additional Provisions:

Washington Certification Number: WA2020-005

**WASHINGTON DEPARTMENT OF COMMERCE**

  
 Director or Designee

7/2/2020  
 Date



STATE OF WASHINGTON  
**UTILITIES AND TRANSPORTATION COMMISSION**  
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
(360) 664-1160 • TTY (360) 586-8203

July 27, 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: Pacific Power & Light Annual Renewable Portfolio Standard Compliance Report  
**Docket UE-160777**

Dear Mr. Johnson:

In Order 01 of the above mentioned docket, the Commission determined that Pacific Power and Light (Pacific Power or Company) had complied with the 2016 renewable portfolio standard (RPS) target calculation and reporting requirements. The Commission ordered Pacific Power to file a report no later than June 1, 2018, that listed the certificate numbers for every renewable energy credit (REC) that the Company retired in the Western Renewable Energy Generation Information System (WREGIS), along with details about which certificates were used for its voluntary renewable energy programs for 2016.

**Staff Analysis of Pacific Power's 2016 Final RPS Compliance Report**

In its July 27, 2016, revised filing, Pacific Power correctly calculated its 2016 RPS target of 370,166 MWh, and identified a mix of wind- and incremental hydro-based RECs from 2015 and 2016 that it planned to use to meet this target. Table 1 below displays the mix of resources that Pacific Power planned to deploy to meet the target.

**Table 1: Pacific Power's 2016 Renewable Resource Target and Compliance Plan**

<b>2016 Target (MWh)</b>	<b>Incremental Hydro (MWh)</b>	<b>2015 Generation and RECs</b>	<b>2016 Generation and RECs</b>	<b>Total Compliance Resources (MWh)</b>
370,166	1,903	215,961	152,302	370,166

On May 29, 2018, Pacific Power filed its final RPS compliance report for 2016. Commission staff (Staff) has reviewed the compliance report and determined that Pacific Power has met its 2016 RPS target. Table 2 below details the resources Pacific Power used to meet the target.

**Table 2: Summary of 2016 Pacific Power RCW 19.285.040 Compliance**

Facility Name	Facility Type	Vintage Year 2015	Vintage Year 2016	Total
Pavant	Solar	316		316
Goodnoe Hills	Wind	5,383	18,292	23,675
Leaning Juniper I	Wind	15,187	16,552	31,739
Marengo	Wind	24,062	29,087	53,149
Marengo II	Wind	11,102	13,918	25,020
Campbell Hill	Wind	23,680	27,276	50,956
Dunlap I	Wind	27,359	31,741	59,100
Glenrock I	Wind	23,306	11,571	34,877
Rolling Hills	Wind	5,468		5,468
Top of the World	Wind	45,911		45,911
Bennett Creek Wind Farm	Wind	8,656		8,656
Hot Springs Wind Farm	Wind	8,028		8,028
Nine Canyon Wind Project	Wind	2,500		2,500
Lower Snake River – Phalen Gulch	Wind	1,300		1,300
Elkhorn Valley Wind Farm	Wind	4,468		4,468
Fighting Creek LFGTE Plant	Biogas	730		730
Hidden Hollow Energy	Biogas	12,501		12,501
JC Boyle	Incremental Hydro		235	235
Lemolo 1	Incremental Hydro		1,113	1,113
Lemolo 2	Incremental Hydro		95	95
Prospect 2	Incremental Hydro		329	329
<b>TOTAL</b>		<b>219,957</b>	<b>150,209</b>	<b>370,166</b>

As part of its 2016 RPS compliance, Pacific Power has retired unbundled RECs purchased from a variety of plants. A portion of these RECs (20,515) were produced from solar, wind, and biogas facilities located either in the Pacific Northwest or in another state in which Pacific Power serves retail customers: Pavant, Nine Canyon, Fighting Creek, Hidden Hollow, and Elkhorn Valley. The Department of Commerce has determined that three of these facilities (Nine Canyon,

Fighting Creek, and Elkhorn Valley) are eligible renewable resources, and has marked them as eligible in WREGIS. Pavant—a solar facility in Utah—and Hidden Hollow—a biogas plant in Idaho—are registered as renewable resources in WREGIS, though the Department of Commerce has not marked them as eligible to use for RPS compliance in Washington.

Staff has reviewed information on these plants, believes they meet the requirements as eligible renewable resources under the EIA, and recommends the Commission approve Pacific Power's use of RECs acquired from them to fulfill its RPS compliance obligations.

### **Conclusion**

For 2016, Pacific Power has fully complied with the reporting requirements contained in Order 01, entered August 12, 2016. The Commission should approve the eligibility of Pavant, Nine Canyon, Fighting Creek, Hidden Hollow, and Elkhorn Valley and the use of RECs acquired from these resources for RPS compliance.

Sincerely,

Andrew Rector  
Regulatory Analyst