

March 12, 2018

VIA ELECTRONIC FILING

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

RE: Docket U-161024—Pacific Power & Light Company’s Response to Joint Recommendations filed by Puget Sound Energy, Northwest and Intermountain Power Producers Coalition, Renewable Energy Coalition, Renewable Northwest, Northwest Energy Coalition, and Climate Solutions

Pacific Power & Light Company (Pacific Power), a division of Pacific Power, submits these comments in response to a joint recommendation made by a subset of parties in this proceeding. As part of this rulemaking, the Washington Utilities and Transportation Commission (Commission) is considering changes to rules associated with the Commission’s implementation of the Public Utility Regulatory Policies Act (PURPA).

In the PURPA work-stream of this proceeding, parties filed comments in April 2017, the Commission held a workshop in May 2017, and Staff led a workshop in September 2017. Pacific Power has been an active participant throughout this process. While there are areas of disagreement among parties in this proceeding, following the September 2017 workshop, there appeared to be consensus regarding the discrete issue of qualifying facility (QF) contracting procedures and timelines. Pacific Power was therefore surprised to see that only a subset of parties filed a joint recommendation. Pacific Power received no notice from any party regarding this filing, nor did any party reach out to Pacific Power to seek to work collaboratively on this joint recommendation. Pacific Power only learned of this recommendation a few days after it was filed.

This joint recommendation by only a select group of parties appears to be an end-run around the open and collaborative process set forth by the Commission and staff in this proceeding. For this reason, Pacific Power urges staff and the Commission to disregard the filing and instead use an open and inclusive process in this rulemaking. Pacific Power believes that an open and inclusive process ultimately produces superior results and mitigates against the risk of an approach that does not consider what is in the best interests of each utility’s customers.

Pacific Power seeks to continue to be a part of this rulemaking process and have productive discussions with staff and parties. Pacific Power has serious concerns with the joint recommendation set forth by the subset of parties in this proceeding. Specifically, Pacific Power has serious concerns with the 15-year contract length, eligibility cap, capacity and energy rates, time between contract execution and initial deliveries, and the renewable price stream; all important issues that Pacific Power would like an opportunity to address in a constructive manner with all parties.

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To the extent that Staff and the Commission are considering the joint recommendation by only a select group of parties in this proceeding, it should provide all parties an opportunity to engage in this process. For this reason, if the Commission is considering this joint recommendation, Pacific Power believes that there should be an opportunity to respond to this new proposal, some items which were neither discussed in workshops nor included in the original list of questions that formed the basis of the April 2017 comments.

Please direct inquiries to me at (503) 813-5410.

Sincerely,

 /s/

Ariel Son

Regulatory Affairs Manager

Pacific Power & Light Company

825 NE Multnomah Street, Suite 2000

Portland, OR 97232

(503) 813-5410

ariel.son@pacificorp.com