

Topic / Requirement	Relevant Chapter 480-106 WAC	Avista	Puget Sound Energy	Pacific Power
Filing components	whole chapter			
Contracting procedures in tariff	030(2)(a)	Included as attachment; unclear whether attachment is part of tariff	Clearly described for large QFs in Schedule 92; not clear for small QFs	Included
Schedule of estimated avoided costs for small QFs	030(3)	Included	Included	Included
Info required for draft executable contracts for small QFs	030(4)	Included as attachment; unclear whether attachment is part of tariff	Not included	Included
Standard contract provisions for small QFs	030(4)	Included	Included	Included
Info required for large QFs to obtain contracts	030(5)	Included as attachment, but Schedule 62 applies to small QFs only	Included	Included
Non-binding term sheets and limited contract provisions for large QFs	030(5)	Not yet reviewed; not noted in tariff	Not yet reviewed	Not yet reviewed
Avoided cost rate methodology for large QFs	050(5)	Not yet included	Included	Contained in cover letter; not yet in tariff
QF rate options for large QFs	050(3)	Schedule 62 applies to small QFs only	Not addressed in tariff	Included
As-available - energy only, valued at time of delivery	050(3)(a)	Not yet filed; Schedule 62 for small QFs only	Not addressed in tariff	Called "non-firm;" 85% derate not substantiated
Committed - energy and capacity, valued at time of delivery	050(3)(b)(i)	Not yet filed; Schedule 62 for small QFs only	Not addressed in tariff	time-of-delivery rate does not include capacity valuation
Committed - energy and capacity, valued at time of LEO/contract	050(3)(b)(ii)	Not yet filed; Schedule 62 for small QFs only	Not addressed in tariff	Included
Rate options and required fixed rates for small QFs in schedule of estimated avoided costs	050(4)	Included	Included	Included
15 years for new QFs starting on date of contract execution; no less than 12 years from commercial operation	050(4)(a)(i)	Included	Included	Included
10 years for existing QFs	050(4)(a)(ii)	Not yet included	Included	Not yet included
5 years for RWC 80.80.040 non-compliant QFs	050(4)(a)(iii)	Not yet included	Included	Not yet included
Standard rate for small QFs: rate options	050(4)(b)			
As-available	050(4)(b)(i)	85% derate not substantiated	Mostly implemented	Called "non-firm;" 85% derate not substantiated
Committed - valued at time of delivery	050(4)(b)(ii)(A)	Short term power rate offered does not align with rule	Mostly implemented	time-of-delivery rate does not include capacity valuation
Committed - valued at time of LEO/contract	050(4)(b)(ii)(B)	Included	Included	Included

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Schedule of Estimated Avoided Costs	040(1); 050(4)(a)			
Avoided cost of energy based 20-year on market forecast: source of forecast	040(a)	2019 IRP draft	2019 IRP draft	Internal forward price curve updated quarterly
Adjustments				
On-peak / Off-peak	040(a)	Yes	No	Yes
Seasonal	040(a)	Yes; monthly energy shaping factors	No seasonal adjustments	Yes, summer and winter
Differentiation by fuel type	040(2)	Yes	No	Yes; tracking and fixed-tilt
Treatment of QF-generated RECs	050(4)(c)	Specified in tariff that RECs are not included in PURPA purchases	Rule language in Schedule 91, but not Schedule 92; tariff and PPA requires QF to make RECs available for purchase	Rule language included in tariff
Integration costs	050(4)(d)	Not included	Not included	Included
Schedules for QF types				
wind		Yes	Yes	Yes
solar		Yes	Yes	Yes; tracking and fixed-tilt
baseload		Yes	Yes	Yes
renewable + storage		No	No	No
On-peak / Off-peak		Yes	No	Yes
Avoided cost of capacity	040(b)			
Year of capacity need		2027	2023; no peaker proxy in current filing	2021; Peaker proxy 2019-2020, but implementation does not comply with rule
Next planned capacity resource	040(b)	gas peaker	flow battery; avoided capacity calculation based on all planned resources	Using 2021 online date for 2017 Oregon solar RFP; not using 2017 IRP as required in rule
Capacity payment adjustments				
Levelization		Levelized; capacity payments based on year of QF commercial operation	Levelized across all planned capacity additions; does not include peaker proxy for 2019-2022	n/a; capacity needed in 2019
Capacity contribution adjustment		Included	Included	Included
System peak capacity assessment approach		from IRP; methodology not clearly defined	From IRP; effective load carrying capacity	From IRP; not adjusted for WCA
Capacity factor estimates		From IRP	Not used	From IRP
Capitalized energy cost adjustment		Not used	Not used	Used; results in capacity valuation of \$0