

June 30, 2015

Mr. Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive
Olympia, WA 98504-7250

Re: Comments of Renewable Northwest and Northwest Energy Coalition on Docket UE-151145: June 4, 2015 Notice of Opportunity to File Written Comments on 2015 Renewable Resource Target Pursuant to RCW 19.285.040 and WAC 480-109-040.

Renewable Northwest (“Renewable NW”) and the NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on the Avista Corporation’s (“Avista’s”) June 1, 2015, filing pertaining to compliance with the January 1, 2015 renewable energy targets set forth in Washington’s Energy Independence Act (“I-937”).

We commend Avista for acquiring sufficient eligible renewable energy to meet the 2015 target, and are pleased that they intend to meet the target through acquiring renewable energy rather than an alternative compliance mechanism. The renewable energy acquired since the passage of I-937 has built on our legacy hydropower endowment through efficiency investments in hydroelectric generators and new renewable energy projects in Washington, diversifying our energy portfolio, cleaning our air, creating new jobs and leading to more stable energy prices for ratepayers.

In previous years, Renewable Northwest and the Coalition have focused on the two- step compliance review and the need for the June 1st report to focus on the resources acquired for the current year. The Commission’s rules adopted in March 2015 significantly clarified the process. Despite the rule change, Avista does not appear to have changed its practice to reflect the focus of the amended process rules. Avista’s June 1, 2015, report continues to focus on the 2014 compliance year. The purpose of the report on June 1, 2015, as outlined in WAC 480-109-210, is primarily to report on the resources that the utility had in place to meet its renewable resource obligation for the 2015 compliance year. With Avista’s report primarily focused on 2014, it is difficult to understand how the company is positioned to meet its target for the 2015 compliance year. However, because sufficient information on the 2015 year appears at the end of the report, we do not oppose approval of the filing.

We appreciate the transparency of Avista’s incremental cost calculation. One noticeable improvement from the previous year is the company’s inclusion of an adjustment to account for the value of Renewable Energy Credits transferred from Idaho to Washington. Secondly, we acknowledge the fact that the company now includes negative incremental costs for renewable resources that were cheaper than an alternative resource.

We support the Commission approving Avista's June 1, 2015, filing for the above-referenced docket, though we would appreciate the Commission reiterating the compliance year focus for the report. We appreciate your consideration of these joint comments, and look forward to answering any questions at the July 30, 2015 Open Meeting.

Sincerely,

Kelly Hall, Renewable Northwest
Megan Decker, Renewable Northwest
Joni Bosh, NW Energy Coalition
Wendy Gerlitz, NW Energy Coalition