

January 15, 2010

## VIA ELECTRONIC FILING

Washington Utilities & Transportation Commission 1300 S. Evergreen Park Drive SW P.O. Box 47250 Olympia, WA 98504-7250

Attention:

David W. Danner

**Executive Director and Secretary** 

Re:

Advice No. 10-01 - Proposed Modifications to Schedule 70 and 73

Schedule 70 – Renewable Energy Rider – Optional

Schedule 73 – Renewable Energy Rider – Optional Bulk Purchase Option

Dear Mr. Danner:

Pursuant to Washington Law, including without limitation RCW 80.28.050 and RCW 80.28.060 and WAC 480-80-121, PacifiCorp, d.b.a. Pacific Power ("PacifiCorp" or "the Company") submits for filing the following proposed tariff sheets. The Company respectfully requests that the proposed tariff revisions become effective on February 26, 2010.

Fifth Revision of Sheet No. 70.1 Schedule 70 Renewable Energy Rider – Optional

Third Revision of Sheet No. 70.3 Schedule 73 Renewable Energy Rider – Optional

**Bulk Purchase Option** 

Through this filing, the Company is requesting the addition of a specific generation technology, pipeline or irrigation canal hydroelectric systems, to the list of resources that are eligible for support under the Blue Sky program. PacifiCorp's Blue Sky program allows customers in Washington the opportunity to support the development of renewable energy beyond what is included in the Company's general resource portfolio. Through the Blue Sky program, the Company purchases renewable energy credits ("RECs") to match customer subscriptions. Funds remaining after purchasing RECs to satisfy customer subscriptions and covering program administrative costs may be used to fund community based renewable energy projects. Customer support for the program has been considerable with National Renewable Energy Laboratory ranking the program #3 nationally in 2008 among utility green pricing programs for renewable energy sales and total number of customer participants. 

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The Renewable Energy section in Schedules 70 and 73 list the renewable energy technologies eligible for support through the Blue Sky program. The Company has recently become aware of a hydro generation technology that is not eligible for support through the program under current

<sup>1</sup> http://www.nrel.gov/news/press/2009/679.html

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program tariffs. Turbines installed in water pipelines and irrigation canals are able to take advantage of energy that would otherwise be wasted. Many water and irrigation systems utilize pressure reducing valves to control pressure as water flows from higher to lower elevation zones. These valves can be replaced with or substituted by hydro turbines which accomplish the same task and convert the reduction in pressure to electricity. These turbines have no negative impact on water quality relative to the pressure reducing valves and therefore should be considered equivalent to other Blue Sky eligible hydro resources with regard to environmental impact. In addition, generation systems using this technology are certifiable by Green-e Energy.

Under the current program tariffs, hydro generation projects are eligible for program support only if they are certified as low impact<sup>2</sup> or are wave or tidal action projects. While pipeline and irrigation canal generation systems are certifiable as low impact hydroelectric generation by LIHI, the administrative burden and cost to obtain certification of each of these projects is often prohibitive for smaller facilities. The Company believes that by adding this generation technology to the list of program eligible resources, development of and investment in this clean and renewable energy technology will be advanced. Further, the Company believes that adding these facilities to the list of Blue Sky program eligible resources is in alignment with the program's objective to enable customers the opportunity to support the further development of renewable energy resources in the western region.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): <u>datarequest@pacificorp.com</u>

By regular mail: Data Request Response Center

PacifiCorp

825 NE Multnomah Blvd., Suite 2000

Portland, OR 97232

Informal questions should be directed to Cathie Allen, Washington regulatory affairs manager, at 503-813-5934.

Sincerely,

andrea L. Kelly/ca

Vice President, Regulation

Enclosures

<sup>&</sup>lt;sup>2</sup> Hydro generation projects are certified as low impact by the Low Impact Hydropower Institute (LIHI).

## NOTICE PACIFIC POWER

Pursuant to Washington Law (including without limitation RCW 80.28.050 and –060) and the Washington Utilities and Transportation Commission's ("Commission") Rules & Regulations (including without limitation WAC 480-80-121), Pacific Power has filed with the Commission an original tariff schedule for electric service in the State of Washington.

## Overview

The purpose of this filing is to revise Pacific Power's currently effective Schedule 70 – Renewable Energy Rider – Optional, and Schedule 73 – Renewable Energy Rider – Optional Bulk Purchase Option

Through this filing, the Company is requesting the addition of a specific generation technology, pipeline or irrigation canal hydroelectric systems, to the list of resources that are eligible for support under the Blue Sky program.

Unless suspended by the Commission, these tariffs will become effective February 26, 2010.

DATED: January 15, 2010

PACIFIC POWER

Andrea L. Kelly Vice President, Regulation

## Attachment B

The proposed tariff sheets to be revised in the Company's currently effective Tariff WN-U-74 are designated as follows:

| Fifth Revision of Sheet No. 70.1 | Schedule 70 | Renewable Energy Rider – Optional                         |
|----------------------------------|-------------|---|
| Third Revision of Sheet No. 70.3 | Schedule 73 | Renewable Energy Rider – Optional<br>Bulk Purchase Option |