

ATTORNEY GENERAL OF WASHINGTON

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July 13, 2020

Mark L. Johnson, Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE P.O. Box 47250 Olympia, WA 98405-7250

RE: In the Matter of the Petition of PacifiCorp, d/b/a Pacific Power & Light Company, for a Declaratory Order Approving the Avoided Cost Methodology for Power Purchases from Large Qualified Facilities per WAC 480-106-050(5)

Docket UE-200573

Dear Mr. Johnson:

This letter is in response to Pacific Power & Light Company's (PacifiCorp) petition for Commission approval of its "avoided cost methodology for qualifying facilities (QF) with capacities greater than five megawatts in accordance with WAC 480-106-050(5)." Petition at ¶1.

Commission Staff is not aware of any analysis demonstrating concerns with the Company's filing. In fact, Staff anticipates PacifiCorp's cost methodology to be similar to that of Puget Sound Energy's large QF methodology. Finally, Staff here in no way presupposes any outcomes with regard to any future complaints filed either under or against PacifiCorp's tariff.

Respectfully,

/s/ Harry Fukano, WSBA No. 52458 Assistant Attorney General Office of the Attorney General Utilities and Transportation Division P.O. Box 40128 Olympia, WA 98504-0128 (360) 664-1225 harry.fukano@utc.wa.gov

HOF:klg cc: Parties

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