

UTC Comment form for Energy Independence Act Rulemaking, WAC 480-109, Docket UE-131723

Submit this form by 5 PM Monday, Dec. 2, 2013 via the Commission’s Web portal at www.utc.wa.gov/e-filing or by e-mail to records@utc.wa.gov.

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Name of Organization or “self”

In the first column, fill in the section or subsection of interest in the rule. In the next columns provide the specific text, proposal for change, and rationale.

Comment 1	Current Text	Proposed Text	Rationale for proposed change
Regarding WAC 480-109-007(9)(b)	(b) Incremental electricity produced as a result of efficiency improvements completed after March 31, 1999, to hydroelectric generation projects owned by a qualifying utility and located in the Pacific Northwest or to hydroelectric generation in irrigation pipes and canals located in the Pacific Northwest, where the additional generation in either case does not result in new water diversions or impoundments.	(b) Incremental electricity produced as a result of efficiency improvements completed after March 31, 1999, to hydroelectric generation projects owned by a qualifying utility and located in the Pacific Northwest or to hydroelectric generation in irrigation pipes and canals located in the Pacific Northwest, where the additional generation in either case does not result in new water diversions or impoundments. Once the commission or the department has determined the amount of incremental electricity produced by the generation facility, that amount or a utility’s share of that amount, can be used by a utility to meet its renewable energy target obligations under WAC 480-109-020; it does not need further determination by the other entity.	Administrative Efficiency and Consistency – Once one state government entity determines the amount of incremental electricity produced as a result of efficiency improvements for a hydroelectric generation project, it should not be necessary for an additional state government entity to determine the same amount again.