**BEFORE THE WASHINGTON**

**UTILITIES AND TRANSPORTATION COMMISSION**

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| In the Matter of  PACIFIC POWER & LIGHT COMPANY  Petition for a One-Time Exemption from the Provisions of WAC 480-109-200(3). | DOCKET UE-131063  PACIFICORP’S PETITION FOR WAIVER |

# I. INTRODUCTION

1. In accordance with WAC 480-07-110(2) and WAC 480-07-370(b), Pacific Power & Light Company, a division of PacifiCorp (Pacific Power or Company), petitions the Washington Utilities and Transportation Commission (Commission) for an order waiving the requirements of WAC 480-109-200(3) and authorizing the Company to use eligible hydropower generation resources that are not registered in the Western Renewable Energy Generation Information System (WREGIS) towards compliance with the Company’s 2013 Energy Independence Act (EIA) renewable resource target.

# II. BACKGROUND

*2.*  Pacific Power is an electric utility and public service company doing business in the state of Washington under RCW 80.04.010, and its public utility operations, retail rates, service, and accounting practices are subject to the Commission’s jurisdiction. PacifiCorp also provides retail electricity service under the name Pacific Power in Oregon and California and under the name Rocky Mountain Power in Idaho, Utah, and Wyoming. The Company’s principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon, 97232.

*3.* Pacific Power’s name and address:

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| Pacific Power Washington Dockets  825 NE Multnomah Street, Suite 2000  Portland, OR 97232  [washingtondockets@pacificorp.com](mailto:washingtondockets@pacificorp.com) | Etta Lockey  Senior Counsel  825 NE Multnomah Street, Suite 1800  Portland, OR 97232  Phone: (503) 813-5701  [etta.lockey@pacificorp.com](mailto:etta.lockey@pacificorp.com) |

In addition, the Company respectfully requests that all data requests be addressed to:

By e-mail (preferred) [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail Data Request Response Center

PacifiCorp

825 NE Multnomah Street, Suite 2000

Portland, OR 97232

Informal inquiries may be directed to Ariel Son, Manager, Regulatory Projects, at (503) 813‑5410.

# III. THE BASIS FOR A WAIVER

*4.* In General Order R-578, the Commission adopted new rule language regarding registration in WREGIS of facilities used to comply with Washington’s EIA. Specifically, WAC 480-109-200(3) now requires that “[a]ll eligible hydropower generation and all renewable energy credits used for utility compliance with the renewable resource target must be registered in WREGIS, regardless of facility ownership.” In the order adopting the new rule language, the Commission stated that a utility unable to comply with the WREGIS registration requirement when submitting a 2013 compliance report “may provide documentation and request a one-time exemption from [WAC 480-109-200(3)].”[[1]](#footnote-1)

Pacific Power is unable to comply with the WREGIS registration requirement set forth in WAC 480-109-200(3). In the Company’s 2013 Washington Energy Independence Act Final Renewable Compliance Report, filed concurrently with this petition, the Company reports the use of the Wanapum Dam hydro facility towards compliance with Pacific Power’s renewable resource target. At this time, however, Grant County Public Utility District (Grant PUD) has not registered the Wanapum Dam facility in WREGIS. The Company respectfully requests the Commission provide a one-time exemption from the requirements of WAC 480-109-200(3) and allow Pacific Power to use the output from the Wanapum Dam facility towards its renewable resource target for 2013. The Company continues to work with Grant PUD to ensure that the Wanapum Dam and Priest Rapids Dam facilities are registered in WREGIS before the Company submits its final renewable compliance report for 2014.

Consistent with the Commission’s directive in General Order R-578, the Company provides the following confidential documentation associated with the output of the Wanapum Dam:

* Attachment A: Letter outlining contract attributes for Wanapum Dam/Priest Rapids
* Attachment B: Purchaser allocations for 2013
* Attachment C: Wanapum 2012 and 2013 summary of incremental hydrogeneration volumes

If the Commission does not grant Pacific Power a one-time exemption from the requirements of WAC 480-109-200(3), then the Company will use alternative RPS-eligible RECs to fulfill the 631-REC shortfall.

# IV. CONCLUSION

*5.* Pacific Power respectfully requests that the Commission grant the Company a waiver from the requirements of WAC 480-109-200(3) and authorize the Company to use the output of the Wanapum Dam towards compliance with the Company’s renewable resource target for 2013.

Respectfully submitted this 1st day of June, 2015.

By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Etta Lockey

Senior Counsel

Pacific Power & Light Company

1. *In the Matter of Amending, Adopting, and Repealing Rules in WAC 480-109 Relating to the Energy Independence Act*, General Order R-578, Docket UE-131723 at n.54 (Mar. 13, 2015). [↑](#footnote-ref-1)