

**BEFORE THE**  
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of	)	DOCKET UE-151162
	)	
Pacific Power and Light Company,	)	COMMENTS OF BOISE WHITE
2015 Renewable Resources Report.	)	PAPER, L.L.C.
_____	)	

1                   Pursuant to the Washington Utilities and Transportation Commission’s (the “Commission”) notice of opportunity to file written comments, Boise White Paper, L.L.C. (“Boise”) submits the following comments regarding the Pacific Power and Light Company (“Pacific Power” or the “Company”) 2015 Renewable Resources Report (“RRP”).

2                   In general, Boise is supportive of the methodologies employed by the Company to calculate the incremental cost of complying with Washington’s renewable portfolio standard. Accordingly, Boise recommends that the Commission accept the Company’s renewable resource target calculation contained in the RRP.

3                   Specifically, Boise is supportive of using realistic assumptions for the least-cost substitute resource when making comparisons to the levelized cost of the eligible renewable resource, as defined in RCW 19.285.050(1)(b). Based on the Company’s 2015 Integrated Resource Plan, market purchases will be used to fulfill nearly all of the Company’s short-term energy and capacity needs. As such, these market purchases should be the least-cost substitute resource in the Company’s incremental costs calculations.

4

Boise also agrees with the Company's proposal to treat the incremental cost as zero for renewable energy from owned hydro and purchase power agreements. To the extent that construction of incremental hydro capacity is more cost effective than the substitute resource, then the Company would have undertaken construction of the incremental hydro project regardless of Washington's renewable portfolio standard. Thus, there is no incremental cost or benefit derived from these resources directly attributable to RCW 19.285—meaning there is no need to account for them in the RRP analysis.

5

Boise appreciates this opportunity to provide comments on Pacific Power's 2015 RRP. Boise recommends that the Commission determine that the Company is in compliance with its renewable resource target and issue a decision accepting the RRP. Boise looks forward to any continued discussion with the Commission and parties on this matter.

Dated this 30th day of June, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Jesse E. Cowell*

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