

June 30, 2015

Mr. Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive  
Olympia, WA 98504-7250

**Re: Comments of Renewable Northwest and NW Energy Coalition on Docket UE-151162: June 4, 2015 Notice of Opportunity to File Written Comments on 2015 Renewable Resource Target Pursuant to RCW 19.285.040 and WAC 480-109-040.**

Renewable Northwest (“Renewable NW”) and the NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on the PacifiCorp June 1, 2015, filing pertaining to compliance with the January 1, 2015 renewable energy targets set forth in Washington’s Energy Independence Act (“I-937”).

We commend PacifiCorp for acquiring sufficient eligible renewable energy to meet the 2015 target, and are pleased that they intend to meet the target through acquiring renewable energy rather than an alternative compliance mechanism. The renewable energy acquired since the passage of I-937 has built on our legacy hydropower endowment through efficiency investments in hydroelectric generators and new renewable energy projects in the region, diversifying our energy portfolio, creating new jobs, and leading to more stable energy prices for customers.

In previous years, Renewable Northwest and the Coalition have commented extensively on the process for review of compliance filings. The Commission’s rules adopted in March 2015 significantly clarified the process, and we are pleased that PacifiCorp complied with the requirement to report on the resources in place by January 1 to meet the renewable resource obligation for 2015. However, PacifiCorp’s report would benefit from more clarity about transfers of system renewables not ordinarily allocated to Washington customers.

We are unable to review anything more than PacifiCorp’s qualitative description of its incremental cost analysis, because the analysis is confidential and not accessible to interested parties through the open meeting review. Based on the qualitative description and results, our only concern lies with PacifiCorp’s representation of eligible resource that are cheaper than non-eligible resources. We continue to believe that if an eligible renewable resource is less expensive than an alternative resource, the incremental cost calculation should include a negative cost (i.e., a savings) for that resource. With PacifiCorp’s low incremental cost from the cost cap, we simply note this concern for future reference.

We support the Commission approving PacifiCorp’s June 1, 2015, filing in the above-referenced docket. We appreciate your consideration of these joint comments, and look forward to answering any questions at the July 30, 2015 Open Meeting.

Sincerely,

Kelly Hall, Renewable Northwest  
Megan Decker, Renewable Northwest  
Joni Bosh, NW Energy Coalition  
Wendy Gerlitz, NW Energy Coalition