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April 1, 2019

Washington Utilities and Transportation Commission
1300 S. Evergreen Parkway Dr. S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket U-161024, Comments of OneEnergy Renewables

Dear Commissioners,

OneEnergy Renewables (“OneEnergy”) submits these comments on the proposed rules for standard power purchase agreements (“PPAs”) with PURPA qualifying facilities in Docket U-161024. We previously submitted comments on the draft rules in this docket.

We continue to strongly support adoption of the proposed rules. However, we also continue to have concerns about implementation of the program (assuming the Commission adopts the rules).

First, we request the Commission order the utilities to file estimated avoided cost pricing within 30 days after the rules are final. Proposed rule WAC 480-106-040 will require regular filings by November 1 of each year, but we recommend that regular schedule commence in 2020. There is no basis to wait until November 1, 2019 for the initial avoided cost filing.

We also request the Commission set prompt deadlines for the utilities to file tariffs and make available standard power purchase agreements for review and execution by qualifying facilities.

Last, we wish to note an issue which, while not directly related to the proposed rules, will very likely impair implementation of this program: PacifiCorp is significantly delayed in processing interconnection applications.

For example, OneEnergy has interconnection applications pending with PacifiCorp under queue numbers Q1071 (filed 10/5/2018), Q1072 (also filed 10/5/2018), and Q1084 (filed 11/5/2018). Feasibility Study Agreements for these projects were fully executed with PacifiCorp on 12/11/2018, 12/11/2018 and 1/7/2019, respectively. Each of the feasibility study agreements requires the utility to provide OneEnergy with a feasibility study report within 30 business days of the execution of the Feasibility Study Agreements barring any unusual circumstances. PacifiCorp notified OneEnergy within days of signature of the feasibility study agreements that they would be unable to provide the studies within the outlined timelines “due to a

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significant number of Interconnection Requests proposing to interconnect in the same geographical area.” There are seven (7) active interconnection requests for projects in Yakima County in PacifiCorp’s interconnection queue as of the April 1, 2019, three (3) of which are OneEnergy’s requests. Responding to a OneEnergy request for an update on 2/26/2019, PacifiCorp did not have any new information on the study timelines. As of this letter, PacifiCorp has not provided an update to OneEnergy regarding its interconnection requests. We hope the Commission will play a role in resolving these queue delay issues.

We appreciate the opportunity to submit these comments.

Sincerely,

WILLIAM EDDIE, CEO
503-232-3852 | [D](#)



Attachment A

OneEnergy Development, LLC Affiliates

Bobolink Solar, LLC
Cormorant Solar, LLC
Flycatcher Solar, LLC
Kingfisher Solar, LLC
OE Longspur Solar, LLC
OE Meadowlark Solar, LLC
OE Merlin Solar, LLC
Sandpiper Solar, LLC
Shearwater Solar, LLC
Siskin Solar, LLC
Tanager Solar, LLC
Turnstone Solar, LLC
Vireo Solar, LLC
Waxwing Solar, LLC
Whimbrel Solar, LLC