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State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Additionally,

July 12, 2019

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland square Loop S.E.  
P.O. Box 47250  
Lacey, WA 98503-7250

**Re: Comments of NW Energy Coalition on Docket UE- 190445: June 7, 2018 Notice of Opportunity to Comment on Electric Utility Energy Independence Act Reports Concerning Conservation and Renewable Portfolio Standards Pursuant to RCW 19.285.070 and WAC 480-109**

NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on Avista Corporation’s (“Avista” or “the Company”) June 21, 2019 revised filing detailing the eligible renewable resources acquired for compliance with the renewable resource targets set forth in Washington’s Energy Independence Act (“I-937”).

We applaud Avista for meeting the 2019 target by acquiring renewable energy rather than through an alternative compliance mechanism. I-937 continues to drive renewable energy investments that diversify Washington’s energy portfolio, leading to a more reliable grid, rate stability, job creation, and progress towards state emissions goals.

However, as in the Company’s 2016, 2017 and 2018 compliance reports, Avista’s most recent report information on incremental costs as confidential, challenging the public’s ability to constructively analyze and comment on the compliance report. Additionally, it may well be time to rethink the long-held assumption that Mid-C resources or a CCCT are adequate for calculating non-eligible costs. At the very least, non-eligible resources should include the social cost of carbon, per sections 14 and 15 of 2SSB 5116.

We have repeatedly requested more transparency on incremental costs, but this detail remains unaddressed. The remainder of Avista’s report and compliance efforts for 2019 are solid; consequently, we suggest the Commission endorse the current report. However, we request that the Commission address and provide more instruction to Avista, in this filing or through a separate process, that requires more explicit transparency in the next report with respect to incremental cost assumptions and calculations

We appreciate the opportunity to submit these comments for your consideration.

Sincerely,

Joni Bosh, NW Energy Coalition

