December 29, 2014

***VIA ELECTRONIC FILING***

Steven V. King

Executive Director and Secretary

Washington Utilities and Transportation Commission

1300 S. Evergreen Park Drive SW

PO Box 47250

Olympia, WA 98504-7250

**RE: Advice 14-08—Schedule 37—Avoided Cost Purchases from Cogeneration and Small Power Production**

Dear Mr. King:

Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits this filing in compliance with RCW 80.28.050, RCW 80.28.060, WAC 480-107-055 and WAC 480-107-095, and the Washington Utilities and Transportation Commission’s (Commission) Rules and Regulations. The Company requests an effective date of January 29, 2015.

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| --- | --- | --- |
| Fourth Revision of Sheet No. 37.2 | Schedule 37 | Avoided Cost Purchases from Cogeneration and Small Power Production |

The Company’s current avoided cost prices and Schedule 37 became effective February 28, 2014. Since that time resource requirements, natural gas prices, and market prices have changed, as have the Company’s avoided costs. This filing updates the Company’s estimated avoided cost prices and Schedule 37 based on the costs that the Company would expect to pay “but for” the Qualifying Facility resource.

The following attachments are included with this filing:

Attachment A: Summary of the Company’s Avoided Cost Calculation Methodology

Attachment B: Summary Page of Tariffs

Attachment C: Proposed Tariff Sheet No. 37.2

It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to:

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

By regular mail: Data Request Response Center

 PacifiCorp

 825 NE Multnomah Street, Suite 2000

 Portland, Oregon, 97232

Informal questions should be directed to Natasha Siores, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6583.

Sincerely,

R. Bryce Dalley

Vice President, Regulation

Enclosures

**ATTACHMENT A**

**PACIFIC POWER & LIGHT COMPANY**

**AVOIDED COST CALCULATION**

**WASHINGTON - DECEMBER 2014**

**ATTACHMENT B**

**ATTACHMENT C**