

July 14, 2017

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-170694: June 13, 2017 Notice of Opportunity to File Written Comments on 2017 Renewable Resource Targets Pursuant to RCW 19.285.070 and WAC 480-109-210(3).

Renewable Northwest and the NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on the Pacific Power June 1, 2017 filing pertaining to compliance renewable energy targets set forth in Washington’s Energy Independence Act (“I-937”).

We commend Pacific Power for acquiring sufficient eligible renewable energy to meet the 2017 target, and are pleased that the company intends to meet the target through acquiring renewable energy rather than an alternative compliance mechanism. However, we continue to have concerns regarding reporting on the incremental cost calculations.

In previous years, Renewable Northwest and the Coalition have commented on the lack of detailed information provided on the incremental cost calculation in Pacific Power’s I-937 compliance reports. The company’s chosen method of reporting hinders the public’s ability to analyze the validity of the incremental cost calculations. We encourage the company to include this information, as other companies have done and continue to do, in future reports. Pacific Power’s filing is largely redacted, with the majority of the information marked as confidential. In our view, the redacted report lacks much of the information required by the reporting rules in WAC 480-109-210, and makes it difficult for the general public to analyze the incremental cost calculations. Because Pacific Power’s incremental costs are very low, we simply note this as a concern, but request that the company provide more detailed information in future reports.

We recommend that the Commission approve the June 1, 2017 filing in the above-referenced docket, but further recommend that the Commission direct Pacific Power to increase transparency in its 2018 report with respect to its renewable resource costs and incremental cost calculations. We appreciate your consideration of these joint comments, and look forward to answering any questions at the August 10, 2017 Open Meeting.

Sincerely,

Amanda Jahshan, Renewable Northwest
Dina Dubson Kelley, Renewable Northwest
Joni Bosh, NW Energy Coalition
Wendy Gerlitz, NW Energy Coalition