

July 22, 2016

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 Northwest Energy Coalition on Docket UE- 160777:
June 3, 2016 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 and the NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on the PacifiCorp June 1, 2016 filing pertaining to compliance with the January 1, 2016 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 2016 target, and are pleased that the company intends to meet the target through acquiring renewable energy rather than an alternative compliance mechanism. Furthermore, the Commission’s rules adopted in March 2015 clarified that the result of the incremental cost calculation may be a negative number; we applaud the company for properly accounting for the negative incremental cost of resources in the 2016 report.

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 PacifiCorp’s I-937 compliance reports. The initial 2016 filing contained information on the company’s renewable resource costs, but failed to provide any details on the substitute resource cost assumptions. Upon request, Renewable Northwest and the Coalition received a qualitative description of the assumptions behind the substitute resource costs and referenced assumptions in PacifiCorp’s past IRPs. The company’s qualitative description provided helpful information to our organizations regarding the assumptions, but not including this information in the compliance report would hinder the general public’s ability to analyze the validity of the incremental cost calculations. We encourage the company to include this information in future reports.

PacifiCorp’s original filing that contained information on the renewable resource costs was later replaced by a redacted version 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 again, hinders the general public’s ability to analyze the incremental cost calculations. Because PacifiCorp’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, 2016 filing in the above-referenced docket, but further recommend that the Commission direct PacifiCorp to increase transparency in its 2017 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 12, 2016 Open Meeting.

Sincerely,

Kelly Hall, Renewable Northwest
Dina Dubson Kelley, Renewable Northwest
Joni Bosh, NW Energy Coalition
Wendy Gerlitz, NW Energy Coalition