



Via WUTC's Electronic Webportal

June 11, 2010

Mr. David W. Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Subject: Docket No. UE-100849
Examine whether the Commission should consider adopting new regulations relating to the acquisition of renewable resources by Washington's investor-owned electric utilities.
Comments of ADAGE LLC

Dear Mr. Danner:

ADAGE LLC ("ADAGE") appreciates the opportunity to participate in the process whereby the Washington Utilities and Transportation Commission (the "Commission") considers whether adoption of new regulations relating to the acquisition of renewable resources by Washington's investor-owned electric utilities ("IOUs") should be considered. In response to the Commission's Notice of Opportunity to File Statements of Issues and Written Comments to the proposed rule dated May 21, 2010 in Docket No. UE-100849, ADAGE offers the following statement of issues for the Commission to consider:

- Consider, when analyzing power purchase contracts from IOUs, measuring and crediting the positive "externalities" of certain renewable energy projects, such as: a) sustained local economic impact and b) benefit of offering baseload (e.g. non-intermittent) capacity.
- Certain renewable energy projects provide significant sustained local positive economic impacts that are in the range of several tens of millions of dollars and hundreds of jobs annually, while delivering baseload capacity.
- Consider whether such positive externalities of certain renewable energy projects can be credited in the evaluation of new power purchase contracts within the existing statutory and regulatory frameworks.

Thank you for the opportunity to offer ADAGE's viewpoint on these issues. ADAGE looks forward to further discussions during this review. Please direct any questions regarding these comments to the undersigned at 301.841.2460.

Sincerely,

A handwritten signature in cursive script that reads "Stefano Ratti".

Stefano Ratti
Vice President, Business Operations, ADAGE LLC