



April 20, 2007

VIA EMAIL

Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Dear Ms. Washburn:

**Re: Rulemaking to Implement Initiative Measure No. 937
Docket No. UE-061895**

Powerex Corp. is submitting these comments in response to the Commission's March 30, 2007 Notice of Opportunity to File Written Comments which asks for additional public comment on the initial draft rules.

Powerex is the wholly-owned marketing subsidiary of the British Columbia Hydro and Power Authority ("BC Hydro"), a provincial Crown Corporation owned by the Government of British Columbia. Powerex sells power at wholesale in the United States, from a portfolio of resources including the Canadian Entitlement resources made available under the Columbia River Treaty, BC Hydro system surplus resources, and various other power resources acquired from other sellers within the United States. Powerex has been a reliable energy supplier in the Pacific Northwest since 1988.

supply.
flexibility.
commitment.

Powerex filed comments in response to the Commission's January 30, 2007 Notice of Opportunity to File Written Comments, and participated in the Commission's March 26, 2007 stakeholder workshop.

Powerex has reviewed the initial draft rules, and supports section WAC 480-109-020(3) of the rules which clarifies that a renewable resource within the Pacific Northwest may receive integration services from sources outside of the Pacific Northwest and remain eligible to count towards a utility's renewable resource target.

Powerex looks forward to continuing to participate in this proceeding, and appreciates the opportunity to file comments on the initial draft rules. Please call me at (604) 895-7030 regarding any questions on this matter.

Yours truly,

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