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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

July 12, 2019

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
P.O. Box 47250
Lacey, Washington 98503-7250

Re: Comments of Northwest Energy Coalition on Docket UE-190448: June 10, 2019 Notice of Opportunity to Comment on Electric Utility Energy Independence Act Reports Concerning Conservation and Renewable Portfolio Standards Pursuant to RCW 19.285.070 and WAC 480-109

The NW Energy Coalition (“the Coalition”) appreciates the opportunity to comment on the Pacific Power May 31, 2019 filing pertaining to compliance with renewable energy targets set forth in Washington’s Energy Independence Act (“I-937”). We recommend that the Commission approve the Company’s June 1, 2018 filing in the above- referenced docket at this time.

While we commend Pacific Power for acquiring sufficient eligible renewable energy to meet the 2019 target, and are pleased that PAC intends to meet the target by acquiring renewable energy rather than through an alternative compliance mechanism, we continue to have concerns regarding the Company’s reporting on the incremental cost calculations as well as questions on some aspects of the report.

In our responses to previous reports, we have commented repeatedly that the amount of redacted and confidential information included within the Company’s filing does not simply hinder, but actually makes it impossible for the public to be able to analyze the validity of the incremental cost calculations. The redacted report simply lacks much of the information required by the reporting rules in WAC 480-109-210. It is not possible to verify why Pacific Power’s incremental costs remain low, or exactly how much of which resources will be acquired. It is not at all clear why PAC considers nearly all the current information confidential, while other utilities do not. At the very minimum, the Annual Report should contain a summary of each resource, the number of MWhs, the one year incremental cost and what resources and their values were used to calculate those costs.

Further, there are some troubling inconsistencies in the small amount of non-redacted information. For example, on page 5 of the report PAC states they will use wind and hydroelectric resources to meet the 2019 targets, yet on page 7 the information PAC reported to the Department of Commerce shows PAC will rely on solar as well, and on page 11 solar resources are listed, but the RECS from only *some* solar resources are provided.

We have, over the past several compliance periods, repeatedly requested that Pacific Power include more detailed information in their reports, and we have been repeatedly disappointed. This lack of transparency does not comport with the intent or spirit of Energy Independence Act and stands at odds with the level of detail provided by the two other IOUs. We recommend that the

Commission withhold approval of the 2019 filing in the above-referenced docket, and request that the Commission direct Pacific Power to increase transparency in this current report with respect to its cost calculations, and provide specifics about the resources that will be used to meet the requirements of the law.

We look forward to reviewing a more transparent report.

Sincerely,

Joni Bosh, NW Energy Coalition