

July 19, 2018

Mr. Mark L. Johnson
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 E-180500: June 7, 2018 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

Renewable Northwest and the NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on the Pacific Power (“the Company”) June 1, 2018 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.

We commend Pacific Power for acquiring sufficient eligible renewable energy to meet the 2018 target, and are pleased that the company intends to meet the target by acquiring renewable energy rather than through an alternative compliance mechanism. However, we continue to have concerns regarding the Company’s reporting on the incremental cost calculations.

As we have commented in the past, the amount of redacted and confidential information included within the Company’s filing hinders the public’s ability to analyze the validity of the incremental cost calculations. Additionally, the redacted report lacks much of the information required by the reporting rules in WAC 480-109-210. Because Pacific Power’s incremental costs remain low, we, again, note this as a concern, and request that future reporting includes more detailed information from the Company.

We recommend that the Commission approve the June 1, 2018 filing in the above-referenced docket, and suggest that the Commission direct Pacific Power to increase transparency in its 2019 report with respect to its incremental cost calculations. We appreciate the opportunity to submit these joint comments for your consideration.

Sincerely,

Amanda Jahshan, Renewable Northwest

Joni Bosh, NW Energy Coalition

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COMMISSION