

November 6, 2013

VIA ELECTRONIC FILING

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Attn: Steven V. King
Executive Director and Secretary

**RE: Docket No. UE-131883 – Comments
Investigation of the costs and benefits of distributed generation and the effect of
distributed generation on utility provision of electric service**

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) submits the following comments in accordance with the Washington Utilities and Transportation Commission's (Commission) Notice of Recessed Open Meeting and Notice of Opportunity to Submit Written Comments (Notice) issued in Docket UE-131883 on October 15, 2013.

In the Notice, the Commission requested written comments on the issue of distributed generation, and provided a list of specific questions directed to the investor owned utilities. The Company addresses each of these questions in detail below.

- 1. The total number of net metering customer, the total capacity of installed generation of the net metering customers as of October 31, 2013 on the company's system, and the company's net metering cap as of January 1, 2014**

Net Metering as of October 31, 2013	
Customers	126
Installed Capacity	873 kW

Net Metering Capacity Cap as of January 1, 2014	
0.5% of 1996 Peak Demand	4,550 kW

- 2. A description of DG interconnected to the company's distribution system that is not enrolled in the net metering program, including the aggregated capacity for each generation type as of October 31, 2013.**

Currently, all distributed generation systems interconnected to the Company's distribution system are enrolled in the net metering program.


- 3. Aggregated on a company-wide basis, the number of net metering credits that expired under RCW 80.60.030(5), on April 30 in 2011 and 2012, and the aggregate number of net metering credits awarded per month in 2011 and 2012.**

Expired Net Metering Credits	
April 30, 2011	1,669 kWh
April 30, 2012	4,222 kWh

Monthly Net Metering Credits (kWh)		
Month	2011	2012
January	1063	3645
February	609	2093
March	373	1822
April	1430	667
May	0	270
June	0	352
July	7	632
August	198	14
September	54	239
October	549	4769
November	1476	6244
December	4239	3645

PacifiCorp appreciates the opportunity to provide comments and encourages the Commission to take these into account when finalizing these rules. If you have any questions regarding these comments, please contact me at (503) 813-6051.

Sincerely,


William R. Griffith
Vice President, Regulation