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Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: Docket UE-210183—PacifiCorp’s Comments on July 18, 2025 draft rules

The Washington Utilities and Transportation Commission (Commission) issued CR-102 and a Notice of Opportunity to Submit Written Comments on July 18, 2025 (Notice). In this notice, the Commission requested responses to updated text related to the interpretation of “use” when implementing chapter 19.405 RCW. PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp) respectfully submits its responses to the Commission’s specific questions and comments on the interpretation of statutory language.

PacifiCorp supports the updated rules, which continue to recognize the statutorily required four-year approach to demonstrate compliance with the Clean Energy Transformation Act (CETA), and allow for resources to both participate in organized markets and potentially be claimed for CETA compliance.

I. PacifiCorp supports language in WAC 480-100-650, requests clarification

PacifiCorp supports the language in WAC 480-100-650(3)(l), which requires renewable energy credit (REC) and non-power attribute (NPA) information to be included in the utility’s annual clean energy progress report. Based on the CR 101 Comment Summary, it appears that the Commission intends for the new requirement in WAC 480-100-650(3)(l) to break out, rather than report, the information on a monthly basis. This section could be modified to be more clear:

(l) Beginning July 1, 2026, and each year thereafter, the following information disaggregated on at least a monthly basis, in megawatt hours:

II. PacifiCorp appreciates that the proposed rules will reflect longstanding cost-based allocation methodologies

As stated in PacifiCorp’s November 27, 2024, and April 25, 2025, comments, PacifiCorp does not have concerns with this language so long as “supplying” respects PacifiCorp’s multistate cost allocation methodology. PacifiCorp appreciates Staff’s response in the CR 101 comment summary that confirmed that the Commission “expects that a cost allocation methodology will be sufficient for determining that a utility is in compliance with the 100 percent renewable or nonemitting standard.”

III. PacifiCorp supports the Commission's continued recognition of the importance of market resource allocation frameworks

PacifiCorp supports the Commission's support for using RECs and NPAs for primary compliance if market allocation to the utility occurs because of the centralized electricity market's resource allocation framework. PacifiCorp and other stakeholders have worked for months to develop CAISO's Accounting and Reporting Straw Proposal, which is an important step forward to better account for resources—and emissions—serving Washington customers.

PacifiCorp supports the Commission, Washington Department of Ecology, and Washington Department of Commerce to continue implementing this framework in all energy, fuel mix, and greenhouse gas reporting to ensure customers, stakeholders, and regulators are using the same standards to evaluate energy and emissions associated with serving Washington customers.

IV. Conclusion

PacifiCorp appreciates the Commission's work in this docket and the ability to comment on the proposed rules.

Please direct inquiries to Ariel Son, Regulatory Affairs Manager, at ariel.son@pacificorp.com, or (971) 242-6299.

Sincerely,

/s/ Robert Meredith

Robert Meredith

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