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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of a Significant Energy Resource Decision and Voluntary Request for Approval of Resource Decision

Docket No. 17-035-40

**COMMENTS OF
WESTERN RESOURCE ADVOCATES
ON REPORTING REQUIREMENTS**

Western Resource Advocates (“WRA”) submits these comments on PacifiCorp’s proposed reporting system for information relating to its approved new wind and transmission projects in accordance with the September 4, 2018 Notice of Filing and Comment Period of the Utah Public Service Commission (“Commission”).

On August 31, 2018, PacifiCorp filed with the Commission a proposed reporting system for information relating to its approved new wind and transmission projects (“Compliance Filing”), pursuant to the requirements of the Commission’s June 22, 2018 Order in this docket. WRA is providing brief recommendations specifically related to PacifiCorp’s proposed reporting treatment for “the realized value of RECs [renewable energy credits] sold associated with the generation from the wind projects.” Compliance Filing, page 1. PacifiCorp has proposed reporting, on an annual, project level basis, the number of RECs sold, REC vintage, REC price,

and REC revenue. Compliance Filing, *Attachment A, Proposed Reporting System for the Combined Projects*, page 11. WRA supports the inclusion of this information in the report. WRA recommends that PacifiCorp also provide on the same basis the entities to whom RECs were sold, as well as whether any RECs were retired (instead of sold), and on whose behalf they were retired. This will provide a more complete picture of the disposition of the renewable attributes of the wind projects, their value to PacifiCorp ratepayers, and insight into the projects' contribution to compliance with state renewable portfolio standards. This information can also help assure that the renewable attributes are not double-counted, or double-claimed, which could present a liability risk to PacifiCorp associated with those sales.

Dated this 1st day of October 2018.

Respectfully submitted,



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CERTIFICATE OF SERVICE
Docket No. 17-035-40

I hereby certify that a true and correct copy of the foregoing was served by email this 1st day of October 2018 on the following:

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