



STATE OF WASHINGTON

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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November 3, 2014

Steve Crow, Executive Director  
Northwest Power and Conservation Council  
851 SW Sixth Ave, Suite 1100  
Portland Oregon, 97204-1348

Dear Mr. Crow:

This letter provides comments as requested in the Northwest Power and Conservation Council's (NWPCC or Council) September 2014 issue paper "Proposed High Level Indicators of Progress on the Pacific Northwest Electric Power Planning and Conservation Act's Power Plan Goals." We understand that the NWPCC intends to establish metrics for tracking progress on the Council's Seventh Power Plan. Specifically the High Level Indicators track progress on the region consistent with the Pacific Northwest Electric Power Planning and Conservation Act (Northwest Power Act) which is intended:

- To encourage conservation and efficiency in the use of electric power,
- To encourage the development of renewable resources within the Pacific Northwest, and
- To assure the Pacific Northwest of an adequate, efficient, economical and reliable power supply.<sup>1</sup>

The Washington Utilities and Transportation Commission (Commission) supports the Council's use of high-level indicator metrics to track the region's progress toward achieving goals of the Northwest Power Act. Recently, the Commission proposed similar metrics to help track Washington investor-owned utilities' progress toward meeting the policy goals of the state's Energy Independence Act, to "increas[e] energy conservation" and "protect clean air and water."<sup>2</sup> The Commission's proposed rule includes an Energy and Emissions Intensity Metrics reporting section that requires companies to report for the preceding ten years the following metrics:

- (a) MWh per residential customer,
- (b) MWh per commercial customer,

<sup>1</sup> Northwest Power Act, 94 Stat. 2697 §2(1)(A) (Dec. 5, 1980).

<sup>2</sup> The proposed UTC rule is available at:

<http://www.utc.wa.gov/layouts/CasesPublicWebsite/CaseItem.aspx?item=document&id=99&year=2013&docketNumber=131723>

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- (c) MWh per capita,
- (d) Million tons of CO2 emissions, and
- (e) Comparison of annual million tons of CO2 emissions to 1990 emissions.

The Council also lists metrics that it is considering but not proposing to adopt.<sup>3</sup> The Commission supports the collection and presentation of these metrics in the 7<sup>th</sup> Power Plan even though the Council is not proposing the metrics for adoption. As with the metrics the Council is proposing to adopt, these additional metrics provide a view of the regional system which is useful for policy and planning purposes. As an example, the “average regional hydroelectric generation per unit of available water” can help indicate if water is being spilled, and therefore hydroelectric generation displaced, due to renewable generation. This is an important metric for indicating the opportunity for the development of additional regional energy storage.

In summary, the Commission supports the Council’s use of high level indicator metrics to gauge the progress of fulfilling the goals of the Northwest Power Act.

Sincerely,



Steven V. King  
Executive Director and Secretary

cc: Tom Karier  
Phil Rockefeller

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<sup>3</sup> Indicators Issues Paper, Page 6.