

November 25, 2015

VIA ELECTRONIC FILING

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504 – 7250

RE: Compliance Filing—Order 04 in Docket UE-144160—Schedule 37—Avoided Cost Purchases from Cogeneration and Small Power Purchases

In accordance with RCW 80.28.050, 80.28.060, WAC 480-107-095, and Order 04 in Docket UE-144160, Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits for filing a copy of proposed tariffs applicable to Pacific Power's electric service in the state of Washington. The Company respectfully requests an effective date of November 29, 2015.

Fourth Revision of Sheet No. 37.2 Schedule 37 Avoided Cost Purchases from Cogeneration and Small Power Production

In compliance with Order 04 in Docket UE-144160, this filing updates the Company's estimated avoided cost prices and Schedule 37 based on the costs that the Company would expect to pay "but for" the Qualifying Facility resource, including separate avoided cost rates for energy and capacity consistent with the terms and requirements of the order.

The following attachments are included with this filing:

- Attachment A: Summary of the Company's avoided cost calculation methodology
- Attachment B: Summary Page of Tariffs
- Attachment C: Proposed Tariff Schedule 37

Please direct any informal inquiries regarding this filing to Natasha Soares, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6583.

Sincerely,



R. Bryce Dalley
Vice President, Regulation

Enclosures

ATTACHMENT A

**PACIFIC POWER & LIGHT COMPANY
AVOIDED COST CALCULATION**

WASHINGTON - NOVEMBER 2015

Washington Utilities and Transportation Commission rule WAC 480-107-055, related to schedules of estimated avoided costs, states that avoided costs should be based on:

- (a) The most recent project proposals received pursuant to an RFP issued under these rules;
- (b) Estimates included in utility's current integrated resource plan filed pursuant to WAC 480-100-23;
- (c) The results of the utilities most recent bidding process;
- (d) Current projected market prices for power.

The starting point for the avoided cost calculation in this filing is the load and resource balance from the Company's 2013 Integrated Resource Plan (IRP) Update, filed on March 31, 2014. The avoided cost prices are then developed consistent with the west control area allocation methodology adopted by the Washington Utilities and Transportation Commission in Docket No. UE-061546.

Loads and Resources

Table 1 presents the Company's west control area loads and resource balance. Table 1 shows an energy balance with a surplus of 345 aMW in 2015 declining to a deficit of 111 aMW in 2024. The winter peak has a capacity deficit of 124 MW in 2015 increasing to a deficit of 858 MW in 2024. The summer peak has a capacity deficit of 191 MW in 2015 increasing to 732 in 2024.

Avoided Cost Calculation

Resource deficiency period is assumed to begin when the load and resource balance is short in both energy and capacity on annual basis. Based on the load and resource balance shown in **Table 1**, the avoided cost calculation is separated into two distinct periods: (1) the Short Run – a period of resource sufficiency (2015 through 2020); and (2) the Long Run – a period of resource deficiency (2021-2024).

1. Short Run Avoided Costs

During periods of resource sufficiency, the company's avoided energy costs are based on the displacement of purchased power and existing thermal resources as modeled by the company's GRID model. The model input data includes the monthly load and resource data, which are the basis for the annual summary of loads and resources shown in **Table 1**. To calculate short-run avoided costs, two production cost studies are prepared, where the only difference between the two studies is an assumed 50 aMW resource modeled at zero cost. The outputs of the production cost model run are provided as **Table 2**.

Winter capacity costs in this period are based on a three-month capacity purchase using the cost of a simple cycle combustion turbine (SCCT). The annual value as shown in **Table 3** is one-fourth of the capacity cost of a simple cycle combustion turbine.

2. Long Run Avoided Costs

During the resource deficiency period, avoided costs are the fixed and variable costs of a combined cycle combustion turbine (CCCT).¹

Long Run Avoided Costs use the peak credit method to separate the non-fuel costs of the proxy CCCT into capacity and energy components. Under the method, non-fuel costs associated with the construction of a CCCT that exceed the cost of a SCCT are designated as capitalized energy and added to the variable production (fuel) cost of the CCCT in the total avoided energy costs. **Table 3** shows the capitalized energy costs.

The fuel cost of the CCCT defines the avoided variable energy costs. **Table 4** shows the CCCT fuel cost and the total avoided energy costs.

Because energy generated by a qualifying facility may vary, avoided costs at 75%, 85% and 95% capacity factors are prepared to illustrate the impact of differing generation levels. These calculations are shown in **Table 5**.

Avoided energy costs are differentiated between on-peak and off-peak periods. To make this calculation, the Company applies all capacity costs to meet on-peak prices. On an annual basis, approximately 57% of all hours are on-peak and 43% are off-peak. **Table 6** shows the calculation of on-peak and off-peak avoided energy prices.

For informational purposes, **Table 7** shows a comparison between the avoided costs currently in effect in Washington and the proposed avoided costs in this filing.

Table 8 shows the calculation of the total fixed costs and fuel costs of the CCCT and SCCT that are used in **Table 3** and **Table 4**.

Gas Price Forecast

The electricity and natural gas prices used in this filing are from the Company's Official Forward Price Curve dated September 30, 2014. Both the electricity and natural gas prices are inputs to the Company's GRID model in the calculation of the proposed short-run avoided energy costs in this filing. Natural gas prices are also used to calculate the fuel costs of the CCCT proxy resource for the Long Run avoided costs, as shown in **Table 9**.

¹ CCCT (Dry "J" Adv 1x1) - West Side Options (1500) as modeled for the 2013 IRP Update. Fuel costs are from the Company's September 2014 Official Forward Price Curve.

Table 1
Loads and Resources
2015 through 2024

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
aMW										
Net Load	2,306	2,302	2,308	2,310	2,316	2,313	2,313	2,317	2,324	2,330
Long Term Sales	180	179	180	180	180	179	180	180	180	179
Short Term Firm Sales	-	-	-	-	-	-	-	-	-	-
Total Requirements	2,486	2,481	2,488	2,490	2,495	2,493	2,493	2,497	2,504	2,510
Long Term Purchases	290	166	61	53	24	25	24	16	22	10
Short Term Firm Purchase	41	-	-	-	-	-	-	-	-	-
Thermal Generation	2,022	2,020	2,017	2,017	2,017	2,018	2,017	2,014	2,012	2,012
Other Generation	551	551	549	550	551	551	479	479	478	479
Reserves	(73)	(79)	(80)	(83)	(87)	(88)	(101)	(103)	(104)	(103)
Total Resources after Reserves	2,831	2,658	2,548	2,538	2,506	2,505	2,419	2,406	2,407	2,399
Surplus / (Deficit)	345	176	60	48	10	13	(73)	(91)	(97)	(111)
Percent Surplus / (Deficit)	13.9%	7.1%	2.4%	1.9%	0.4%	0.5%	-2.9%	-3.6%	-3.9%	-4.4%
Peak (July)										
Net Load	3,343	3,347	3,353	3,360	3,363	3,365	3,369	3,376	3,385	3,394
Long Term Sales	-	-	-	-	-	-	-	-	-	-
Short Term Firm Sales	-	-	-	-	-	-	-	-	-	-
Total Requirements	3,343	3,347	3,353	3,360	3,363	3,365	3,369	3,376	3,385	3,394
Long Term Purchases	321	51	59	55	10	13	10	18	19	10
Short Term Firm Purchase	-	-	-	-	-	-	-	-	-	-
Thermal Generation	2,034	2,032	2,029	2,029	2,029	2,029	2,029	2,027	2,024	2,024
Other Generation	979	962	979	973	971	969	798	792	810	801
Reserves	(183)	(181)	(168)	(168)	(168)	(164)	(162)	(172)	(172)	(173)
Total Resources after Reserves	3,151	2,864	2,899	2,890	2,843	2,848	2,675	2,665	2,681	2,662
Surplus / (Deficit)	(192)	(482)	(454)	(470)	(520)	(517)	(694)	(711)	(705)	(732)
Percent Surplus / (Deficit)	-5.7%	-14.4%	-13.6%	-14.0%	-15.5%	-15.4%	-20.6%	-21.1%	-20.8%	-21.6%
Peak (January)										
Net Load	3,662	3,651	3,655	3,660	3,667	3,667	3,669	3,676	3,686	3,697
Long Term Sales	-	-	-	-	-	-	-	-	-	-
Short Term Firm Sales	-	-	-	-	-	-	-	-	-	-
Total Requirements	3,662	3,651	3,655	3,660	3,667	3,667	3,669	3,676	3,686	3,697
Long Term Purchases	355	315	76	70	40	45	39	(8)	34	20
Short Term Firm Purchase	175	-	-	-	-	-	-	-	-	-
Thermal Generation	2,105	2,102	2,099	2,099	2,099	2,099	2,099	2,096	2,093	2,093
Other Generation	1,104	1,096	1,099	1,087	1,098	1,104	923	918	924	914
Reserves	(200)	(200)	(186)	(189)	(188)	(187)	(182)	(188)	(188)	(188)
Total Resources after Reserves	3,539	3,314	3,088	3,067	3,048	3,061	2,880	2,819	2,863	2,839
Surplus / (Deficit)	(124)	(337)	(567)	(593)	(619)	(607)	(789)	(857)	(823)	(858)
Percent Surplus / (Deficit)	-3.4%	-9.2%	-15.5%	-16.2%	-16.9%	-16.5%	-21.5%	-23.3%	-22.3%	-23.2%
month offset	-	13	26	39	52	65	78	91	104	117

Table 2

Avoided Energy - \$/MWH

Year	Winter Season				Summer Season						Winter Season	
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec

GRID Production Cost Model Study

2015	\$38.26	\$35.68	\$32.09	\$26.45	\$23.13	\$21.03	\$31.50	\$36.16	\$36.02	\$34.13	\$35.55	\$39.69
2016	\$39.99	\$36.90	\$34.04	\$27.45	\$23.90	\$22.31	\$31.25	\$39.72	\$39.19	\$36.02	\$37.86	\$41.87
2017	\$42.36	\$39.21	\$36.30	\$29.09	\$26.01	\$24.13	\$33.36	\$42.10	\$41.54	\$38.37	\$40.20	\$44.03
2018	\$45.21	\$41.90	\$38.91	\$31.78	\$28.69	\$26.81	\$36.24	\$44.80	\$44.02	\$41.18	\$42.91	\$46.71
2019	\$47.81	\$44.49	\$41.35	\$34.68	\$31.25	\$29.01	\$39.22	\$47.39	\$46.58	\$43.81	\$45.48	\$49.25
2020	\$50.20	\$46.90	\$43.74	\$37.04	\$33.26	\$31.78	\$41.62	\$49.44	\$49.22	\$46.25	\$49.75	\$51.86
2021	\$51.89	\$49.01	\$43.34	\$39.04	\$34.33	\$36.51	\$46.36	\$52.06	\$50.09	\$48.12	\$54.62	\$54.34
2022	\$53.72	\$51.19	\$42.83	\$41.12	\$36.19	\$41.34	\$50.81	\$55.21	\$51.04	\$50.17	\$56.33	\$57.70
2023	\$54.99	\$52.25	\$43.40	\$43.66	\$38.86	\$42.94	\$53.80	\$57.90	\$53.01	\$53.60	\$60.15	\$60.99
2024	\$60.66	\$57.38	\$46.18	\$45.58	\$39.25	\$41.75	\$54.96	\$61.35	\$55.21	\$55.14	\$61.53	\$63.52

Annual Seasonal Average

Year	Winter Season	Summer Season	Annual Average
2015	\$34.64	\$30.35	\$32.48
2016	\$36.39	\$32.08	\$34.12
2017	\$38.56	\$34.27	\$36.40
2018	\$41.27	\$36.97	\$39.10
2019	\$43.88	\$39.56	\$41.70
2020	\$46.61	\$41.94	\$44.14
2021	\$48.72	\$44.59	\$46.64
2022	\$50.49	\$47.47	\$48.97
2023	\$52.59	\$50.04	\$51.30
2024	\$55.82	\$51.31	\$53.39

Source: GRID Production Cost Computer Model Study - Dated 2014, December 2

Table 3
Capitalized Energy Costs

Year	Combined Cycle CT Fixed Costs	Simple Cycle CT Fixed Costs	Capitalized Energy Costs	Capitalized Energy Costs 52.3% CF
	(\$/kW-yr)	(\$/kW-yr)	(\$/kW-yr)	(\$/MWH)
	(a)	(b)	(c) ((a) - (b))	(d) (c)/(8.760 x 52.3%)

Avoided Resource

Fixed Cost x 3 Months

2015	\$29.95
2016	\$30.40
2017	\$30.95
2018	\$31.54
2019	\$32.11
2020	\$32.71

CCCT Proxy Resource

Fixed Cost

2021	\$133.64	\$133.48	\$0.16	\$0.00
2022	\$136.34	\$136.15	\$0.19	\$0.00
2023	\$139.08	\$138.88	\$0.20	\$0.00
2024	\$142.00	\$141.80	\$0.20	\$0.00

Columns

- (a) Table 8 Column (f) - Table 8 Page 2
- (b) Table 8 Column (f) - Table 8 Page 1
- (d) 52.3% CCCT Energy Weighted Capacity Factor - Table 8 Page 3

Table 4
Total Avoided Energy Cost

Year	Gas Fuel Costs Delivered	Energy Cost	Capitalized Energy Costs 52.3% CF	Total Avoided Energy Cost
	(\$/MMBtu)	(\$/MWH)	(\$/MWH)	(\$/MWH)
	(a)	(b)	(c)	(d)
		(a) x 6.550		(b) + (c)

Avoided Resource

2015				\$32.48
2016				\$34.12
2017				\$36.40
2018				\$39.10
2019				\$41.70
2020				\$44.14

CCCT Proxy Resource

2021	\$5.16	\$33.80	\$0.00	\$33.80
2022	\$5.60	\$36.68	\$0.00	\$36.68
2023	\$5.80	\$37.99	\$0.00	\$37.99
2024	\$6.01	\$39.37	\$0.00	\$39.37

Columns

- (a) Table 8 Page 2 Column (g)
- (b) Table 8 Page 2 Column (i) Heat rate 6.550 MMBtu/MWh
- (c) Table 3 Column (d)
- (d) For 2021-2024 - Table 2

Table 5
Total Avoided Cost

Year	Avoided Firm Capacity Costs	Total Avoided Energy Cost	Total Avoided Costs At Stated Capacity Factor		
			75%	85%	95%
	(\$/kW-yr)	(\$/MWH)	(\$/MWH)	(\$/MWH)	(\$/MWH)
	(a)	(b)	(c)	(d)	(e)
			$(b)+(a)/(8.76 \times 0.75)$	$(b)+(a)/(8.76 \times 0.85)$	$(b)+(a)/(8.76 \times 0.95)$

Avoided Resource

2015	\$29.95	\$32.48	\$37.04	\$36.50	\$36.08
2016	\$30.40	\$34.12	\$38.75	\$38.20	\$37.77
2017	\$30.95	\$36.40	\$41.11	\$40.56	\$40.12
2018	\$31.54	\$39.10	\$43.90	\$43.34	\$42.89
2019	\$32.11	\$41.70	\$46.59	\$46.01	\$45.56
2020	\$32.71	\$44.14	\$49.12	\$48.53	\$48.07

CCCT Proxy Resource

2021	\$133.48	\$33.80	\$54.11	\$51.72	\$49.84
2022	\$136.15	\$36.68	\$57.40	\$54.97	\$53.04
2023	\$138.88	\$37.99	\$59.13	\$56.64	\$54.68
2024	\$141.80	\$39.37	\$60.95	\$58.41	\$56.40

Columns

- (a) Table 3 Column (b)
- (b) Table 4 Column (d)

Table 6
Illustrative Base Load - On- & Off Peak- Avoided Cost Prices (1)

Year	Avoided Firm Capacity Costs	Capacity Cost Allocated to On-Peak Hours	Total Avoided Energy Cost	On-Peak 4,993 Hours (3)	Off-Peak 3,767 Hours (2)
	(\$/kW-yr)	(\$/MWH)	(\$/MWH)	(\$/MWH)	(\$/MWH)
	(a)	(b)	(c)	(d)	(e)
		(a) / (8.76 x 91.8% x 57%)		(b) + (c)	(b)

Avoided Resource

2015	\$29.95	\$6.53	\$32.48	\$39.01	\$32.48
2016	\$30.40	\$6.63	\$34.12	\$40.75	\$34.12
2017	\$30.95	\$6.75	\$36.40	\$43.15	\$36.40
2018	\$31.54	\$6.88	\$39.10	\$45.98	\$39.10
2019	\$32.11	\$7.00	\$41.70	\$48.70	\$41.70
2020	\$32.71	\$7.14	\$44.14	\$51.28	\$44.14

CCCT Proxy Resource

2021	\$133.48	\$29.12	\$33.80	\$62.92	\$33.80
2022	\$136.15	\$29.70	\$36.68	\$66.38	\$36.68
2023	\$138.88	\$30.30	\$37.99	\$68.29	\$37.99
2024	\$141.80	\$30.94	\$39.37	\$70.31	\$39.37

Columns

- (a) Table 3 Column (b)
- (b) Table 8 91.8% is the on-peak capacity factor of the Proxy Resource
- (c) Table 4 Column (d)

Notes

- (1) Total Avoided Costs at Stated Capacity Factor are provided for illustrative purposes and are not used for QF pricing.
- (2) Off-Peak is the average annual energy only cost including capitalized energy
- (3) On-Peak is average annual energy plus capacity costs

Table 7
Comparison between Proposed and Current Avoided Costs

Year	Total Avoided Costs with Capacity Costs included at 85.0% Capacity Factor		
	Proposed (1) Avoided Costs (\$/MWH) (a)	Current Avoided Costs (\$/MWH) (b)	Difference (\$/MWH) (c) (a) - (b)
2015	\$36.50	\$35.93	\$0.57
2016	\$38.20	\$37.74	\$0.46
2017	\$40.56	\$39.74	\$0.82
2018	\$43.34	\$41.65	\$1.69
2019	\$46.01	\$44.51	\$1.50
2020	\$48.53	\$47.64	\$0.89
2021	\$51.72	\$50.48	\$1.24
2022	\$54.97	\$57.63	(\$2.66)
2023	\$56.64	\$62.06	(\$5.42)
2024	\$58.41		

9 Year (2015 to 2023) Levelized Prices (Nominal) @ 6.882% Discount Rate (2)

\$/MWH	\$45.11	\$44.99	\$0.12
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Columns

- (a) Table 5 Column (d)
- (b) Avoided Costs Approved by the Commission January 30, 2014

Note: (1) Avoided costs are presented at expected levels. Actual prices received by QFs will depend upon actual generation levels.
(2) Discount Rate - 2013 IRP Update Discount Rate

Table 8
Total Cost of Displaceable Resources

Year	Estimated Capital Cost \$/kW	Capital Cost at Real Levelized Rate \$/kW-yr	Fixed O&M \$/kW-yr	Variable O&M \$/MWh	Total O&M at Expected CF \$/kW-yr	Total Resource Fixed Costs \$/kW-yr
	(a)	(b)	(c)	(d)	(e)	(f)

SCCT Frame "F"x1 - West Side Options (1500')

2012	\$699	\$55.56	\$41.29	\$9.39	\$58.56	\$114.12
2013		\$56.34	\$41.87	\$9.52	\$59.38	\$115.72
2014		\$57.30	\$42.58	\$9.68	\$60.39	\$117.69
2015		\$58.33	\$43.35	\$9.85	\$61.47	\$119.80
2016		\$59.20	\$44.00	\$10.00	\$62.40	\$121.60
2017		\$60.27	\$44.79	\$10.18	\$63.52	\$123.79
2018		\$61.42	\$45.64	\$10.37	\$64.72	\$126.14
2019		\$62.53	\$46.46	\$10.56	\$65.89	\$128.42
2020		\$63.72	\$47.34	\$10.76	\$67.13	\$130.85
2021		\$64.99	\$48.29	\$10.98	\$68.49	\$133.48
2022		\$66.29	\$49.26	\$11.20	\$69.86	\$136.15
2023		\$67.62	\$50.25	\$11.42	\$71.26	\$138.88
2024		\$69.04	\$51.31	\$11.66	\$72.76	\$141.80

Source: (a)(c)(d) Plant Costs - 2013 IRP - Table 6.1 & 6.2

(b) = (a) x 0.07954 Payment Factor

(e) = (d) x (8.76 x 21%) + (c)

(f) = (b) + (e)

SCCT Frame "F"x1 - West Side Options (1500')	
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197	MW Plant capacity
\$699	Plant capacity cost - in \$/kW
\$8.08	Fixed O&M & Capitalized O&M
<u>\$33.21</u>	Fixed Pipeline
\$41.29	Fixed O&M including Fixed Pipeline & Capitalized O&M (\$/kW-Yr)
\$9.39	Variable O&M Costs including O&M Capitalized in \$/MWh
7.954%	Payment Factor
21%	Capacity Factor
36.8%	Capacity Factor - On-peak 21.0% / 57% (percent of hours on-peak)

Table 8
Total Cost of Displaceable Resources

Year	Estimated Capital Cost \$/kW	Capital Cost at Real Levelized Rate \$/kW-yr	Fixed O&M \$/kW-yr	Variable O&M \$/MWh	Total O&M at Expected CF \$/kW-yr	Total Resource Fixed Costs \$/kW-yr	Fuel Cost \$/MMBtu	Total Resource Energy Cost \$/MWh	Total Resource Costs \$/MWh
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)

CCCT (Dry "J" Adv 1x1) - West Side Options (1500')

2012	\$918	\$72.39	\$31.06	\$2.36	\$41.87	\$114.26			
2013		\$73.41	\$31.49	\$2.39	\$42.44	\$115.85			
2014		\$74.66	\$32.03	\$2.43	\$43.16	\$117.82			
2015		\$76.00	\$32.61	\$2.47	\$43.93	\$119.93			
2016		\$77.14	\$33.10	\$2.51	\$44.60	\$121.74			
2017		\$78.53	\$33.70	\$2.56	\$45.43	\$123.96			
2018		\$80.02	\$34.34	\$2.61	\$46.30	\$126.32			
2019		\$81.46	\$34.96	\$2.66	\$47.15	\$128.61			
2020		\$83.01	\$35.62	\$2.71	\$48.04	\$131.05			
2021		\$84.67	\$36.33	\$2.76	\$48.97	\$133.64	\$5.16	\$33.80	\$62.97
2022		\$86.36	\$37.06	\$2.82	\$49.98	\$136.34	\$5.60	\$36.68	\$66.44
2023		\$88.09	\$37.80	\$2.88	\$50.99	\$139.08	\$5.80	\$37.99	\$68.35
2024		\$89.94	\$38.59	\$2.94	\$52.06	\$142.00	\$6.01	\$39.37	\$70.36

**Table 8
Total Cost of Displaceable Resources**

Sources, Inputs and Assumptions

- Source: (a)(c)(d) Plant Costs - 2013 IRP - Table 6.1 & 6.2
 (b) = (a) x 0.07886 Payment Factor
 (e) = (d) x (8.76 x 52.3%) + (c)
 (f) = (b) + (e)
 (g) -
 (h) = 6,550 MMBtu/MWH x (g)
 (i) = (f) / (8.76 x 'Capacity Factor') + (h)

CCCT (Dry "J" Adv 1x1) - West Side Options (1500')

CCCT Statistics	MW	Percent	Cap Cost	Fixed
CCCT (Dry "J" 1x1)	425	90.8%	\$962	\$31.29
CCCT Duct Firing (Dry "J" 1x1)	43	9.2%	\$486	\$28.74
Capacity Weighted	468	100.0%	\$918	\$31.06

CCCT Statistics	MW	CF	aMW	Percent	Variable	Heat Rate
CCCT (Dry "J" 1x1)	425	56.0%	238	97.2%	\$2.43	6,495
CCCT Duct Firing (Dry "J" 1x1)	43	16.0%	7	2.8%	0.08	8,611
Energy Weighted	468	52.3%	245	100.0%	\$2.36	6,550

Rounded

CCCT	Duct Firing	Plant Costs - 2013 IRP - Table 6.1 & 6.2
425	43	MW Plant capacity
\$962	\$486	Plant capacity cost
\$9.61	\$0.00	Fixed O&M & Capitalized O&M
\$21.68	\$28.74	Fixed Pipeline
\$31.29	\$28.74	Fixed O&M including Fixed Pipeline & on-going capital cost
\$2.43	\$0.08	Variable O&M Costs & Capitalized Variable O&M (\$/MWh)
6,495	8,611	Heat Rate in btu/kWh
7.886%	7.886%	Payment Factor
56%	16%	Capacity Factor
	52.3%	Energy Weighted Capacity Factor
	91.8%	Capacity Factor - On-peak 52.3% / 57% (percent of hours on-peak)

Company Official Inflation Forecast Dated September 2014 Forecast

2012		2021	2.0%	2030	1.9%
2013	1.4%	2022	2.0%	2031	1.9%
2014	1.7%	2023	2.0%	2032	1.9%
2015	1.8%	2024	2.1%	2033	2.0%
2016	1.5%	2025	2.0%	2034	1.9%
2017	1.8%	2026	2.0%	2035	2.0%
2018	1.9%	2027	2.0%	2036	2.0%
2019	1.8%	2028	1.9%	2037	2.0%
2020	1.9%	2029	1.9%	2038	2.0%

Table 9
Natural Gas Price - Delivered to Plant
\$/MMBtu

Year	Burnertip East Side Gas Fuel Cost
	(a)
2021	\$5.16
2022	\$5.60
2023	\$5.80
2024	\$6.01

Source

Offical Market Price Forecast dated September 2014

ATTACHMENT B

The proposed tariff sheet to be revised in Pacific Power & Light Company's currently effective Tariff WN U-75 are designated as follows:

Fourth Revision of Sheet No. 37.2 Schedule 37 Avoided Cost Purchases from Cogeneration and Small Power Production

ATTACHMENT C

Schedule 37
COGENERATION AND SMALL POWER PRODUCTION

TERMS AND CONDITIONS: (continued)

6. The Company will purchase the entire output from the Seller's facility, or if the Seller wishes to reduce his net delivery and billing from the Company, the Company will purchase the net output from the Seller's facility. The metering configuration to measure such purchases will be specified in the Power Purchase Agreement and/or Interconnection Agreement.
7. The Avoided Cost rates are fixed for five years. However, these rates are recalculated every year and applicable to any seller that enters into power purchase agreement with PacifiCorp in that year.

GENERAL RULES AND PROVISIONS:

Service under this schedule is subject to the General Rules and Provisions contained in this tariff.

AVOIDED COST RATES:

Deliveries During Calendar Year	Capacity Payment \$/kW - Month	Energy Payment \$/MWH
2015	\$2.50	\$32.48
2016	\$2.53	\$34.12
2017	\$2.58	\$36.40
2018	\$2.63	\$39.10
2019	\$2.68	\$41.70
2020	\$2.73	\$44.14
2021	\$11.12	\$33.80
2022	\$11.35	\$36.68
2023	\$11.57	\$37.99
2024	\$11.82	\$39.37


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(C)(D)(I)

Issued: November 25, 2015
Advice No. UE-144160

Effective: November 29, 2015

Issued by Pacific Power & Light Company

By:  R. Bryce Dalley

Title: Vice President, Regulation

~~Third~~ Fourth Revision of Sheet No. 37.2
 Canceling ~~Second~~ Third Revision of Sheet No. 37.2

Schedule 37
COGENERATION AND SMALL POWER PRODUCTION

TERMS AND CONDITIONS: (continued)

6. The Company will purchase the entire output from the Seller's facility, or if the Seller wishes to reduce his net delivery and billing from the Company, the Company will purchase the net output from the Seller's facility. The metering configuration to measure such purchases will be specified in the Power Purchase Agreement and/or Interconnection Agreement.
7. The Avoided Cost rates are fixed for five years. However, these rates are recalculated every year and applicable to any seller that enters into power purchase agreement with PacifiCorp in that year.

GENERAL RULES AND PROVISIONS:

Service under this schedule is subject to the General Rules and Provisions contained in this tariff.

AVOIDED COST RATES:

Deliveries During Calendar Year	Capacity Payment \$/kW - Month	Energy Payment \$/MWH
<u>2015</u> 2014	<u>\$2.50</u> \$2.45	<u>\$32.48</u> \$29.62
<u>2016</u> 2015	<u>\$2.53</u> \$2.49	<u>\$34.12</u> \$31.92
<u>2017</u> 2016	<u>\$2.58</u> \$2.53	<u>\$36.40</u> \$33.67
<u>2018</u> 2017	<u>\$2.63</u> \$2.57	<u>\$39.10</u> \$35.60
<u>2019</u> 2018	<u>\$2.68</u> \$2.61	<u>\$41.70</u> \$37.44
<u>2020</u> 2019	<u>\$2.73</u> \$2.66	<u>\$44.14</u> \$40.22
<u>2021</u> 2020	<u>\$11.12</u> \$2.71	<u>\$33.80</u> \$43.28
<u>2022</u> 2021	<u>\$11.35</u> \$2.76	<u>\$36.68</u> \$46.04
<u>2023</u> 2022	<u>\$11.57</u> \$2.81	<u>\$37.99</u> \$53.10
<u>2024</u> 2023	<u>\$11.82</u> \$2.86	<u>\$39.37</u> \$57.45

Issued: December 26, 2013~~November 25, 2015~~ Effective: February 28, 2014~~November 29, 2015~~
 Advice No. 43-14UE-144160

Issued by Pacific Power & Light Company

By: R. Bryce Dalley
 Griffith

By: _____ William R.
 Title: Vice President, Regulation