

May 1, 2013

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

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

Attention: Steven V. King
Acting Executive Director and Secretary

RE: Docket UE-100749—Renewable Energy Revenue May 1 Compliance Filing

Dear Mr. King:

In the joint letter submitted by PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company), Washington Utilities and Transportation Commission (Commission) Staff, the Industrial Customers of Northwest Utilities, and Public Counsel on February 28, 2013, the Company agreed to submit a compliance filing detailing renewable energy credit (REC) and renewable energy attribute (REA) revenues for the previous calendar year on May 1 of each year (beginning May 1, 2013). Although the Commission has not yet issued an order requiring this compliance filing, the Company is making this filing to inform the Commission and other parties of actual REC and REA revenues from April 1, 2011, through December 31, 2012.¹ This filing includes revenues from April 1, 2011, to December 31, 2012, to provide a comprehensive calculation of the net balance of REC and REA revenues as of December 31, 2012.

Confidential Attachment A shows an accounting of actual revenues from April 1, 2011, through December 31, 2012, calculated in compliance with Orders 10 and 11.² Page 1 of the attachment shows, for the period April 1, 2011, through December 31, 2012, a summary of the Washington allocation of actual revenues (line 1), the Washington allocation of imputed revenues associated with REAs or RECs held for compliance (line 2), an adjustment for Washington's renewable portfolio standard (RPS) compliance requirements (line 3), the amount of credits passed back to customers through Schedule 95 (line 4), and the amount of accumulated interest through April 30, 2013 (line 5). Total Washington-allocated revenues are shown on line 6. As shown in the attachment, and consistent with amounts previously communicated to the Commission and other parties, the Company over-credited customers for REC and REA revenues by approximately \$3.7 million from April 1, 2011, through December 31, 2012.³ Due to the net over-credit to customers, the Commission approved resetting Schedule 95 (Renewable Energy Revenue

¹ Commission Order 06 in this docket required the Company to credit customers for all REC revenues after April 3, 2011, forward. For administrative ease, revenues from the full month of April are included in this filing.

² The Company designates portions of Attachments A as confidential under the Protective Order in this docket, Order 03.

³ This amount includes interest on the balance from December 31, 2012, through April 30, 2013.

Adjustment) to zero cents per kilowatt hour in Order 13 issued February 12, 2013. There has been no change in circumstances since that time; therefore, the Company is not proposing any revision to Schedule 95 in this compliance filing.

Pages 2 and 3 of Confidential Attachment A show the more detailed calculations that are summarized on page 1. The first step in determining Washington-allocated REA or REC revenues is allocating revenues from the sale of REAs or RECs from west control area resources. Lines 1 through 6 show the total revenue from west control area resources. Lines 10 through 15 show Washington's allocation of these revenues using the Control Area Generation West (CAGW) factor.

The second step is the calculation of imputed revenues associated with REAs or RECs held for compliance according to section C of Order 10. Lines 17 through 50 reflect the calculation of Washington's allocation of the value of REAs or RECs held for compliance. These imputation calculations are categorized by renewable generation resource type (wind, small hydro, large hydro, and biomass). The Company allocates Washington its CAGW share of all REAs or RECs held for compliance, and then multiplies that share by an average price based on transactions for that type and vintage of REA or REC.

The third step in the calculation is shown on lines 52 through 55 and reflects an adjustment for Washington's RPS compliance requirement. This calculation uses the same average price assumption for wind RECs as used in the revenue imputation calculation for RECs held for compliance (described above). Total Washington-allocated REA or REC revenues, before interest and credits to customers, are calculated on line 57.

Page 4 shows a summary of the Company's megawatt hours of renewable generation, quantities of RECs and REAs sold, quantities of RECs and REAs held for compliance, and revenues from sales of RECs and REAs for various types of renewable generation (wind, small hydro, large hydro, and biomass) from resources included in the west control area. This page also shows the average price of RECs and REAs used for the revenue imputation calculations shown on pages 2 and 3. Page 5 shows the calculation of interest using the Company's currently approved after-tax weighted average cost of capital of 6.72 percent. Page 6 reflects revenue credits to Washington customers through Schedule 95.

The Company respectfully requests that all formal correspondence and Staff requests regarding this filing be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232

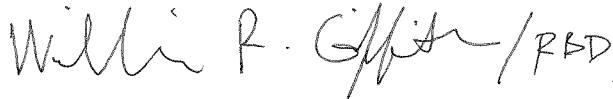
Washington Utilities and Transportation Commission

May 1, 2013

Page 3

Informal questions regarding this filing should be directed to Bryce Dalley at (503) 813-6389 or by e-mail to Bryce.Dalley@PacifiCorp.com.

Sincerely,

Handwritten signature of William R. Griffith, followed by the initials RBD.

William R. Griffith
Vice President, Regulation

Enclosures

cc: UE-100749 Service List

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding by electronic mail and/or Overnight Delivery.

Industrial Customers of Northwest Utilities

Irion Sanger
Melinda Davison
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
ias@dvclaw.com
mjd@dvclaw.com

Washington Utilities & Trans. Comm'n

Don Trotter
1400 S. Evergreen Park Drive S.W.
PO Box 40128
Olympia WA 98504
dtrotter@utc.wa.gov

Office of the Attorney General

Simon ffitc
Sarah Shifley
900 4th Avenue – Suite 2000
Seattle WA 98164
Simonf@atg.wa.gov
Sarah.Shifley@atg.wa.gov

PacifiCorp

Katherine McDowell
419 SW 11th Ave, Suite 400
Portland, OR 97205
katherine@mcd-law.com

The Energy Project

Brad Purdy
Attorney at Law
2019 N. 17th Street
Boise, ID 83702
bmpurdy@hotmail.com

PacifiCorp

Sarah Wallace
Legal Counsel
825 NE Multnomah, Suite 1800
Portland, OR 97232
Sarah.Wallace@pacificorp.com

Wal-Mart

Arthur A. Butler
Ater Wynne LLP
601 Union Street, Suite 1501
Seattle, WA 98101
aab@aterwynne.com

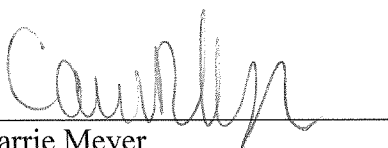
PacifiCorp

Andrea Kelly
Vice President, Regulation
825 NE Multnomah, Suite 2000
Portland, OR 97232
Andrea.kelly@pacificorp.com

RCI

Donald Shoenbeck
Regulatory & Cogeneration Services
900 Washington Street, Suite 780
Vancouver, WA 98660-3455
dws@r-c-s-inc.com

DATED this 1st day of May 2013.



Carrie Meyer
Supervisor, Regulatory Operations

**Summary of Washington-Allocated Revenue from Sale of Renewable Energy Attributes (REAs) and Renewable Energy Credits (RECs)
Docket UE 100749**

(A) (B) (C)

Line	Description	Actual Apr - Dec 2011	Actual 2012	Total	Notes/Formula
1	Washington Allocation of Revenue (WCA Resources)	\$ 2,630,001	\$ 3,958,376	\$ 6,588,377	CONF Attach A Page 3, Line 15
2	Washington Allocation of Imputed Revenue for MWs Held for Compliance (WCA Resources)	\$ 1,867,587	\$ 2,241,803	\$ 4,109,389	CONF Attach A Page 3, Line 50
3	Adjustment for Washington RPS Compliance Requirement	\$ (2,693,196)	\$ (3,584,070)	\$ (6,277,266)	CONF Attach A Page 3, Line 55
4	Less: Credits Passed Back to Customers through Schedule 95 ¹	\$ (3,184,288)	\$ (4,726,012)	\$ (7,910,300)	CONF Attach A Page 6
5	Accumulated Interest through April 2013			\$ (249,366)	CONF Attach A Page 5
6	Total Washington-Allocated Revenue			\$ (3,739,166)	

¹ In addition to the Schedule 95 amounts credited to Washington customers through December 31, 2012, approximately \$920,000 was credited to customers from January 1, 2013, through March 31, 2013. Calendar year 2013 credits will be reflected in the Company's May 1, 2014 compliance filing.

Washington-Allocated Revenue from Sale of Renewable Energy Attributes (REAs) and Renewable Energy Credits (RECs)
 Docket UE-100749

Line	Description	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	Apr - Dec 2011
1	Total Company Booked Revenues (WCA Resources										
2	WCA Wind										
3	WCA Small Hydro										
4	WCA Large Hydro										
5	WCA Biomass										
6	Total Booked Revenues (WCA Resources)	\$ 1,902,660	\$ 1,988,016	\$ 1,882,472	\$ -	\$ -	\$ -	\$ 3,101,276	\$ 1,854,808	\$ 1,096,525	\$ 11,825,757
7	Washington % (CAGW)	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
8											
9											
10	WA Allocated Booked Revenues (WCA Resources										
11	WCA Wind										
12	WCA Small Hydro										
13	WCA Large Hydro										
14	WCA Biomass										
15	Total WA Allocated Booked Revenues (WCA Resources	\$ 423,144	\$ 442,127	\$ 418,654	\$ -	\$ -	\$ -	\$ 689,711	\$ 412,502	\$ 243,863	\$ 2,630,001
16											
17	Imputed Revenue Calculations (Used for RPS Compliance										
18	Held for Compliance (WCA Wind										
19	Washington % (CAGW)	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
20	Washington Allocator										
21	Assumed Percentage Sold	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
22	Washington Allocation Considered Sol										
23	Average Price										
24	WA Allocated Imputed Revenues (WCA Wind										
25											
26	Held for Compliance (WCA Small Hydro										
27	Washington % (CAGW)	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
28	Washington Allocator										
29	Assumed Percentage Sold	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
30	Washington Allocation Considered Sol										
31	Average Price										
32	WA Allocated Imputed Revenues (WCA Small Hydro										
33											
34	Held for Compliance in (WCA Large Hydro										
35	Washington % (CAGW)	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
36	Washington Allocator										
37	Assumed Percentage Sold	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
38	Washington Allocation Considered Sol										
39	Average Price										
40	WA Allocated Imputed Revenues (WCA Large Hydro										
41											
42	Held for Compliance in (WCA Biomass										
43	Washington % (CAGW)	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
44	Washington Allocator										
45	Assumed Percentage Sold	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
46	Washington Allocation Considered Sol										
47	Average Price										
48	WA Allocated Imputed Revenues (WCA Biomass										
49											
50	Total WA Allocated Imputed Revenue	\$ 305,424	\$ 212,542	\$ 259,830	\$ 188,296	\$ 217,186	\$ 122,252	\$ 193,113	\$ 228,340	\$ 140,602	\$ 1,867,587
51											
52	Adjustment for Washington RPS Compliance Requirement										
53	Washington RPS Compliance Requirement (WCA Wind										
54	Average Price										
55	Subtract Revenue for Washington RPS Compliance (WCA Wind	\$ (299,244)	\$ (299,244)	\$ (299,244)	\$ (299,244)	\$ (299,244)	\$ (299,244)	\$ (299,244)	\$ (299,244)	\$ (299,244)	\$ (2,693,196)
56											
57	Total Washington-Allocated Revenue	\$ 429,324	\$ 355,425	\$ 379,240	\$ (110,948)	\$ (82,058)	\$ (176,992)	\$ 583,581	\$ 341,598	\$ 85,221	\$ 1,804,392

Washington-Allocated Revenue from Sale of Renewable Energy Attributes (REAs) and Renewable Energy Credits (RECs)
Docket UE-100749

Line	Description	Jan 2012	Feb 2012	Mar 2012	Apr 2012	May 2012	Jun 2012	Jul 2012	Aug 2012	Sep 2012	Oct 2012	Nov 2012	Dec 2012	Total
1	Total Company Booked Revenues (WCA Resources													
2	WCA Wind													
3	WCA Small Hydro													
4	WCA Large Hydro													
5	WCA Biomass													
6	Total Booked Revenues (WCA Resources													
7		\$ 1,758,258	\$ 1,902,410	\$ 2,425,225	\$ 1,873,269	\$ 1,965,647	\$ 2,077,231	\$ -	\$ -	\$ -	\$ 3,118,893	\$ 1,234,051	\$ 1,289,419	\$ 29,470,168
8	Washington % (CAGW)	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	
9														
10	WA Allocated Booked Revenues (WCA Resources													
11	WCA Wind													
12	WCA Small Hydro													
13	WCA Large Hydro													
14	WCA Biomass													
15	Total WA Allocated Booked Revenues (WCA Resources													
16		\$ 394,450	\$ 426,790	\$ 544,081	\$ 420,252	\$ 440,976	\$ 466,009	\$ -	\$ -	\$ -	\$ 699,698	\$ 276,849	\$ 289,270	\$ 6,588,377
17	Imputed Revenue Calculations (Used for RPS Compliance													
18	Held for Compliance (WCA Wind													
19	Washington % (CAGW)	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	
20	Washington Allocator	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
21	Assumed Percentage Sold													
22	Washington Allocation Considered Sol													
23	Average Price													
24	WA Allocated Imputed Revenues (WCA Wind													
25														
26	Held for Compliance (WCA Small Hydro													
27	Washington % (CAGW)	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	
28	Washington Allocator	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
29	Assumed Percentage Sold													
30	Washington Allocation Considered Sol													
31	Average Price													
32	WA Allocated Imputed Revenues (WCA Small Hydro													
33														
34	Held for Compliance in (WCA Large Hydro													
35	Washington % (CAGW)	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	
36	Washington Allocator	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
37	Assumed Percentage Sold													
38	Washington Allocation Considered Sol													
39	Average Price													
40	WA Allocated Imputed Revenues (WCA Large Hydro													
41														
42	Held for Compliance in (WCA Biomass													
43	Washington % (CAGW)	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	
44	Washington Allocator	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
45	Assumed Percentage Sold													
46	Washington Allocation Considered Sol													
47	Average Price													
48	WA Allocated Imputed Revenues (WCA Biomass													
49														
50	Total WA Allocated Imputed Revenue	\$ 222,883	\$ 186,988	\$ 280,363	\$ 195,271	\$ 237,164	\$ 253,464	\$ 158,901	\$ 135,802	\$ 86,190	\$ 170,272	\$ 122,917	\$ 191,590	\$ 4,109,389
51	Adjustment for Washington RPS Compliance Requirement													
52	Washington RPS Compliance Requirement (WCA Wind													
53	Average Price													
54	Subtract Revenue for Washington RPS Compliance (WCA Win													
55		\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (6,277,266)
56														
57	Total Washington-Allocated Revenue	\$ 318,661	\$ 315,105	\$ 525,771	\$ 316,851	\$ 379,468	\$ 420,800	\$ (139,772)	\$ (162,870)	\$ (212,482)	\$ 571,297	\$ 101,093	\$ 182,187	\$ 2,616,108

		Actual	Actual/Forecast
West Control Area RPS Eligible Wind Generation (MWh)		2011	2012
1	LEANING JUNIPER 1		
2	GOODNOE HILLS		
3	MARENGO		
4	MARENGO II		
5	Total Generation (MWh)		
6	Held for Compliance (MWh)		
7	Available for Sale (MWh)		
8	Actual Sales (MWh)		
9	Retained (MWh)		
10	Total Revenues from Sales		
11	Average Price		
12	% Available for Sale Actually Sold		

		2011	2012
13	COPCO 1		
14	COPCO 2		
15	FALL CREEK		
16	IRON GATE		
17	BEND		
18	CLEARWATER 1		
19	CLEARWATER 2		
20	CONDIT		
21	EAGLE POINT		
22	EAST SIDE		
23	FISH CREEK		
24	PROSPECT 1		
25	PROSPECT 3		
26	PROSPECT 4		
27	SLIDE CREEK		
28	SODA SPRINGS		
29	WALLOWA FALLS		
30	WEST SIDE		
31	Total Generation (MWh)		
32	Held for Compliance (MWh)		
33	Available for Sale (MWh)		
34	Actual Sales (MWh)		
35	Retained (MWh)		
36	Total Revenues from Sales		
37	Average Price		
38	% Available for Sale Actually Sold		

		2011	2012
39	JC BOYLE		
40	LEMOLO 1		
41	LEMOLO 2		
42	MERWIN		
43	PROSPECT 2		
44	SWIFT 1		
45	TOKETEE		
46	YALE		
47	Total Generation (MWh)		
48	Held for Compliance (MWh)		
49	Available for Sale (MWh)		
50	Actual Sales (MWh)		
51	Retained (MWh)		
52	Total Revenues from Sales		
53	Average Price		
54	% Available for Sale Actually Sold		

		2011	2012
55	ROSEBURG FOREST PRODUCTS		
56	Total Generation (MWh)		
57	Held for Compliance (MWh)		
58	Available for Sale (MWh)		
59	Actual Sales (MWh)		
60	Retained (MWh)		
61	Total Revenues from Sales		
62	Average Price		
63	% Available for Sale Actually Sold		

Washington Retail Sales		MWh
65	Calendar Year 2010 (Actual)	3,984,631
66	Calendar Year 2011 (Actual)	4,005,863
67	Calendar Year 2012 (Actual)	4,041,898

Washington RPS Compliance Requirement:		MWh	Reference
69	1/1/12 - 3% (2011 Generation Eligible for Compliance)	119,857	3% of Average 2010 and 2011 Retail Sales
70	1/1/13 - 3% (2012 Generation Eligible for Compliance)	120,716	3% of Average 2011 and 2012 Retail Sales

Washington Revenue Tracker as of 4/29/2013

Interest Rate 6.72% After Tax WACC approved in Washington per UE 111190

Deferral with Interest Calculation YTD Beginning

	Balance	Additions	Amort.	Interest	Ending Balance
Apr-11	-	429,324	(131,614)	834	298,544
May-11	298,544	355,425	(332,649)	1,736	323,056
Jun-11	323,056	379,240	(331,472)	1,943	372,767
Jul-11	372,767	(110,948)	(358,327)	774	(95,735)
Aug-11	(95,735)	(82,058)	(398,043)	(1,880)	(577,716)
Sep-11	(577,716)	(176,992)	(394,302)	(4,835)	(1,153,845)
Oct-11	(1,153,845)	583,581	(359,652)	(5,835)	(935,751)
Nov-11	(935,751)	341,598	(397,908)	(5,398)	(997,459)
Dec-11	(997,459)	85,221	(480,321)	(6,692)	(1,399,251)
Jan-12	(1,399,251)	318,661	(490,037)	(8,316)	(1,578,942)
Feb-12	(1,578,942)	315,105	(429,576)	(9,163)	(1,702,576)
Mar-12	(1,702,576)	525,771	(387,438)	(9,147)	(1,573,389)
Apr-12	(1,573,389)	316,851	(351,667)	(8,908)	(1,617,114)
May-12	(1,617,114)	379,468	(319,690)	(8,888)	(1,566,225)
Jun-12	(1,566,225)	420,800	(343,188)	(8,554)	(1,497,165)
Jul-12	(1,497,165)	(139,772)	(371,566)	(9,816)	(2,018,319)
Aug-12	(2,018,319)	(162,870)	(431,139)	(12,966)	(2,625,295)
Sep-12	(2,625,295)	(212,482)	(393,297)	(16,398)	(3,247,472)
Oct-12	(3,247,472)	571,297	(375,440)	(17,637)	(3,069,252)
Nov-12	(3,069,252)	101,093	(387,775)	(17,991)	(3,373,925)
Dec-12	(3,373,925)	182,187	(445,200)	(19,630)	(3,656,568)
Jan-13	(3,656,568)	-	-	(20,477)	(3,677,045)
Feb-13	(3,677,045)	-	-	(20,591)	(3,697,636)
Mar-13	(3,697,636)	-	-	(20,707)	(3,718,343)
Apr-13	(3,718,343)	-	-	(20,823)	(3,739,166)
		4,420,500	(7,910,300)	(249,366)	

Schedule 95 Revenue Credits to Washington Customers for April 2011 through March 2013

Year/Month	
Apr-11	(131,614)
May-11	(332,649)
Jun-11	(331,472)
Jul-11	(358,327)
Aug-11	(398,043)
Sep-11	(394,302)
Oct-11	(359,652)
Nov-11	(397,908)
Dec-11	(480,321)
Jan-12	(490,037)
Feb-12	(429,576)
Mar-12	(387,438)
Apr-12	(351,667)
May-12	(319,690)
Jun-12	(343,188)
Jul-12	(371,566)
Aug-12	(431,139)
Sep-12	(393,297)
Oct-12	(375,440)
Nov-12	(387,775)
Dec-12	(445,200)
Total	(7,910,300)
Jan-13	(495,982)
Feb-13	(371,212)
Mar-13	(49,794)