



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

October 3, 2014

**VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY**

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: Advice 14-06—Schedule 95—Renewable Energy Revenue Adjustment
Docket UE-100749—Compliance Filing**

Dear Mr. King:

Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits this filing in compliance with RCW 80.28.050, RCW 80.28.060, WAC section 480-100-028, and previous Washington Utilities and Transportation Commission (Commission) orders in Docket UE-100749. The Company requests an effective date of November 16, 2014.

Second Revision of Sheet No. 95.1 Schedule 95 Renewable Energy Revenue Adjustment

This filing requests a rate adjustment to recover \$5.2 million in over-credited revenues from the sale of Renewable Energy Credits (RECs). As previously ordered by the Commission, revenues from the sale of RECs are tracked and credited to customers separately from base rates.¹ The Company's appeal regarding historical REC revenues (January 1, 2009, through April 2, 2011) was resolved through a stipulation and one-time bill credit (Schedule 96) to customers in June 2014.²

Now that the appeal is resolved,³ this filing requests a true up of REC sales proceeds, net of amounts credited to customers, from April 3, 2011, through December 31, 2013.⁴ The Company requests that the \$5.2 million, or 1.6 percent overall, be recovered from customers over a one-year period beginning November 16, 2014. A residential customer using approximately 1,300 kWh per month would see a bill impact of \$1.86 per month. The Company will publish a notice to customers in accordance with WAC 480-100-194 on or before October 16, 2014.

¹ *WUTC v. PacifiCorp, d/b/a Pacific Power & Light Co.*, Docket UE-100749, Order 06, ¶ 204 (Mar. 25, 2011).

² *WUTC v. PacifiCorp*, Docket UE-100749, Order 15 (Jun. 12, 2014).

³ The appeal was resolved through dismissal of the appeal by the Washington State Court of Appeals on July 14, 2014 (No. 44591-3-II) and by the Thurston County Superior Court (No. 12-2-02667-7) on August 7, 2014.

⁴ For administrative ease, revenues for the entire month of April 2011 are reflected in this filing.

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The following attachments are included with this filing:

- Attachment A—Draft Customer Notice
- Attachment B—List of Proposed Tariff Revisions
- Attachment C—Table Showing Bill Impacts
- Confidential Attachment D—REC Revenue Calculation
- Attachment E—Revision to Schedule 95

Background

In Order 06 in Docket UE 100749, the Company’s 2010 general rate case, the Commission ordered Pacific Power to establish a mechanism to credit customers for REC sales proceeds.⁵ The Commission ordered Pacific Power to credit customers \$4.8 million in estimated REC sales proceeds beginning April 3, 2011.⁶ Pacific Power filed a compliance tariff, Schedule 95, crediting the \$4.8 million to customers over twelve months.⁷

In Order 10, the Commission clarified that the mechanism should be based on actual REC sales proceeds rather than a forecasted amount with a true-up.⁸ The Commission also instructed the parties to develop an appropriate mechanism.⁹ On February 28, 2013, the Company, Commission Staff, Public Counsel, and the Industrial Customers of Northwest Utilities (ICNU) filed a joint letter with the Commission discussing the calculation and operation of the REC sales proceeds tracking mechanism.¹⁰ The letter outlined the parties’ agreement regarding calculation of the revenues, the applicable interest rate, and the filing dates.¹¹ The parties agreed to a May 1 filing each year with a rate adjustment, if necessary, on June 1.

Because Pacific Power filed an appeal of Order 10, the Commission did not issue an order approving or rejecting the mechanism.¹² Pacific Power is required, however, to submit annual compliance filings reporting the proceeds from the sale of RECs for the previous calendar year.¹³

During the period April 3, 2011, through December 31, 2012, the Company over-credited customers for REC sales proceeds by approximately \$3.6 million.¹⁴ In a letter filed January 16,

⁵ Order 06, ¶ 203.

⁶ *Id.*, ¶ 204.

⁷ *WUTC v. PacifiCorp*, Docket UE-100749, Compliance Filing Pursuant to Order 06 in Docket UE-100749, Revisions to PacifiCorp’s General Tariffs (Mar. 30, 2011).

⁸ *WUTC v. PacifiCorp*, Docket UE-100749, Order 10, ¶ 58 (Aug. 23, 2012).

⁹ *Id.* ¶¶ 57, 60.

¹⁰ *WUTC v. PacifiCorp*, Docket UE-100749, Joint Letter re: Renewable Energy Credit Tracking Mechanism (Feb. 28, 2014).

¹¹ In a later filing, Commission Staff, Public Counsel, and ICNU affirmed that they “agree with the calculation of REC revenues the Company supplied in its February 28, Compliance Filing.” *WUTC v. PacifiCorp*, Docket UE-100749, Joint Response on Behalf of Commission Staff, Public Counsel and ICNU to the Commission’s Notice Providing Opportunity to File in Compliance with Orders 10 and 11, ¶ 2 (Mar. 22, 2013).

¹² See *WUTC v. PacifiCorp*, Docket UE-100749, Notice of Extension of Deadline for Compliance Filing (Jan. 23, 2014).

¹³ *WUTC v. PacifiCorp*, Docket UE-100749, Order 13, ¶ 8.

¹⁴ See *id.* ¶ 3.

2013, Pacific Power requested that the Commission set Schedule 95 to zero due to this over-credit.¹⁵ On February 12, 2013, the Commission approved the Company's request, effective immediately.

Consistent with the parties' joint proposal, the Company submitted compliance filings on May 1, 2013, and May 1, 2014. In the May 1, 2014 filing, the Company reported an over-credit to customers of approximately \$0.9 million for the sale of RECs in calendar year 2013. The Company did not pursue recovery of the over-credited amounts in the May 1, 2013 or May 1, 2014 compliance filings due to the ongoing controversy and appeal of the Commission's orders. No party commented on these filings or requested that a rate adjustment be implemented associated with the over-credited amounts, nor did any party informally raise concerns with the Company.

The appeal regarding historical REC revenues was resolved through a stipulation and one-time bill credit (Schedule 96) to customers totaling \$13.0 million, implemented in June 2014. The appeal was dismissed by the Washington State Court of Appeals in July 2014 and by the Thurston County Superior Court in August 2014. Now that the appeal is resolved, the Company requests a rate adjustment to true up the amount in the balancing account for the post-April 2011 amounts. Before making this filing, the Company informally notified Commission Staff, Public Counsel, and ICNU of its intent to request recovery of the over-credited amounts.

Calculation of REC Sales Proceeds

Consistent with the calculation of Washington-allocated REC sales proceeds described in the February 28, 2013 joint letter regarding the agreed-upon tracking mechanism, page 1 of Confidential Attachment D shows an accounting of actual proceeds from the sale of RECs from April 3, 2011, through December 31, 2013, calculated in compliance with Orders 10 and 11.¹⁶ Page 1 of the attachment shows a summary of the Washington allocation of actual revenues (line 1), the Washington allocation of imputed revenues associated with 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), the amount of accumulated interest through December 2013 (line 5), and the accumulated interest through calendar year 2014 and the amortization period (line 6). Total Washington-allocated revenues are shown on line 7.

Pages 2 through 4 show the more detailed calculations that are summarized on Page 1. 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)

¹⁵ No party disputed the over-credit. See Order 13, ¶ 6 ("No party disputes that PacifiCorp is over-crediting its customers under the current Schedule 95 or that reducing those credits to zero cents per kilowatt hour is reasonable in light of those over-credits and the REC sales proceeds the Company anticipates receiving in 2013. The Commission agrees and authorizes PacifiCorp to revise Schedule 95 as the Company has proposed.").

¹⁶ The Company designates Attachment D as confidential under the protective order in Docket UE-100749 (Order 03).

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factor from the Commission-approved West Control Area inter-jurisdictional allocation methodology.

Lines 17 through 50 reflect the calculation of Washington's allocation of the value of 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 RECs held for compliance and then multiplies that share by an average price based on transactions for that type and vintage of REC.

Lines 52 through 55 reflect 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. Total Washington-allocated REC sales proceeds, before interest and credits to customers, are calculated on line 57.

Page 5 shows a summary of the Company's megawatt hours of renewable generation, quantities of RECs sold, quantities of RECs held for compliance, and revenues from sales of RECs for various types of renewable generation (wind, small hydro, large hydro, and biomass) from resources included in the west control area. Page 6 shows the calculation of interest using the Company's after-tax weighted average cost of capital.

It is respectfully requested that all formal correspondence and Staff requests regarding this material 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

Informal questions should be directed to Natasha Siores, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6583.

Sincerely,



R. Bryce Dalley
Vice President, Regulation

Enclosures

cc: Service List for Docket UE-100749

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.

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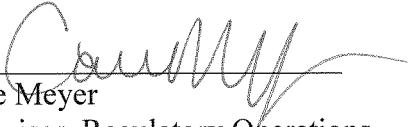
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DATED this 3rd day of October 2014.



Carrie Meyer
Supervisor, Regulatory Operations

Attachment A

Keeping You Informed
Proposed rate change

On October 3, 2014, Pacific Power & Light Company (Pacific Power) submitted an advice filing with the Washington Utilities and Transportation Commission (Commission) requesting a change to Schedule 95, the Renewable Energy Revenue Adjustment tariff.

As part of its normal business practices, Pacific Power sells renewable energy credits (RECs) on the open market. RECs, also known as “green tags,” represent the environmental attributes of the power produced from energy projects. RECs are proof that one megawatt-hour (MWh) of renewable energy was generated.

The Commission ordered Pacific Power to credit proceeds from the sale of RECs to customers. Pacific Power credits these amounts to customers through Schedule 95. In its current filing, Pacific Power seeks to true up amounts already credited to customers with the amount of actual REC sales proceeds received by the company. From April 2011 through December 2013, credits to customers exceeded actual REC sales proceeds received by Pacific Power by \$5.2 million. In its filing, Pacific Power proposes to collect this difference over a one-year period.

If approved by the Commission, this proposed change will result in a temporary increase of \$5.2 million for an overall average increase to Washington customers of approximately 1.6 percent. A residential customer using approximately 1,300 kilowatt-hours (kWh) per month would see a bill impact of \$1.86 per month.

Summary of Proposed Rate Increase for Schedule 95		
Overall increase in dollars		\$5.2 million
Overall increase in percent		1.6%
Type of service	Current rates (¢/kWh)	Proposed rates (¢/kWh)
Residential	0.00	0.143
Commercial/Industrial		
Small general service	0.00	0.129
Medium general service	0.00	0.125
Large general service	0.00	0.118
Public streetlighting	0.00	0.095
Agricultural Pumping service	0.00	0.124

The Commission will examine Pacific Power's request. As a result of this examination, the Commission may determine that the schedule should be accepted as filed, modified, or rejected. If accepted as filed, the rate change would go into effect on November 16, 2014.

You are invited to comment to the Commission. The Commission has the authority to set final rates that may be lower or higher than the Company's request, depending on the outcome of its

examination. You can comment by using the "Submit a Comment" feature on the Commission's website, at utc.wa.gov, or by using the contact information below. Commission staff will make a recommendation to the commissioners at an open meeting in Olympia. These meetings are scheduled every other Tuesday at 9:30 a.m. Please contact the Commission to request to be notified of the scheduled open meeting at which the proposal will be considered by the Commission.

You will have an opportunity to comment in person at this meeting. The Commission is committed to providing reasonable accommodation to participants with disabilities. If you need reasonable accommodation, please contact the Commission at 360-664-1132 or human_resources@utc.wa.gov.

If you are unable to attend the open meeting, the Commission has a bridge line that allows you to participate by telephone. Call 360-664-1234 the day before the open meeting for instructions and to sign in.

Washington Utilities and Transportation Commission

1300 S. Evergreen Park Drive SW
P.O. Box 47250, Olympia, WA 98504-7250
Email: comments@utc.wa.gov
Telephone: 1-888-333-WUTC (9882)

For more information or to contact Pacific Power, please call us toll free at **1-888-221-7070** or write to:

Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

ISSUED: October X, 2014

Pacific Power
A DIVISION OF PACIFICORP

Public Notice Document

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:

Second Revision of Sheet No. 95 Schedule 95 Renewable Energy Revenue Adjustment

Attachment C

**ATTACHMENT C: PRESENT AND PROPOSED RATES
PACIFIC POWER & LIGHT COMPANY
IN WASHINGTON
12 MONTHS ENDED DECEMBER 2013**

Line No.	Description	Curr. Sch. No.	Avg. Cust.	MWH (4)	Revenues (\$000) (5)	Factor 10 Allocator (6)	Proposed Credit (7)	Rate Cents/kWh (9)	
								(8)	(7)/(5)
1	Residential Service	16/17/18	104,635	1,572,835	\$140,088	42.99%	\$2,247	1.6%	0.143
2	Total Residential		104,635	1,572,835	\$140,088		\$2,247	1.6%	
	Commercial & Industrial								
3	Small General Service	24	18,788	543,202	\$48,473	13.44%	\$703	1.4%	0.129
4	Partial Requirements Service	33	0	0	\$0	0.0%	\$0	0.0%	0.125
5	Large General Service <1,000 kW	36	1,054	895,773	\$66,810	21.43%	\$1,121	1.7%	0.125
6	Agricultural Pumping Service	40	5,247	148,533	\$12,666	3.53%	\$184	1.5%	0.124
7	Partial Requirements Service => 1,000 kW	47	1	1,995	\$292		\$5	1.7%	0.118
8	Large General Service => 1,000 kW	48	61	386,902	\$26,036	8.75%	\$452	1.7%	0.118
9	Large General Service => 30,000 kW	48	1	447,982	\$24,941	9.63%	\$504	2.0%	0.112
10	Recreational Field Lighting	54	30	295	\$26	0.00%	\$0	1.0%	0.095
11	Total Commercial & Industrial	25,182	2,424,681	\$179,244			\$2,969	1.7%	
	Public Street Lighting								
12	Outdoor Area Lighting Service	15	2,532	3,355	\$469	0.06%	\$3	0.6%	0.095
13	Street Lighting Service	51	163	3,187	\$621	0.06%	\$3	0.5%	0.095
14	Street Lighting Service	52	15	198	\$34	0.00%	\$0	0.6%	0.095
15	Street Lighting Service	53	217	4,162	\$286	0.08%	\$4	1.4%	0.095
16	Street Lighting Service	57	34	1,743	\$213	0.03%	\$2	0.8%	0.095
17	Total Public Street Lighting	2,961	12,645	\$1,622	0.24%		\$12	0.7%	0.095
18	Total Sales to Standard Tariff Customers	132,778	4,010,161	\$320,954			\$5,228	1.6%	
19	Total AGA				\$652		\$0		
20	Total Sales to Ultimate Consumers	132,778	4,010,161	\$321,606			\$5,228	1.6%	

Confidential Attachment D

Summary of Washington-Allocated Revenue from Sale of Renewable Energy Credits (RECs)
Docket UE 100749
Advice 14-06

Line	Description	Actual Apr - Dec 2011 ¹	Actual 2012 ¹	Actual 2013 ²	Total	Reference
1	Washington Allocation of Revenue (WCA Resources)	\$ 2,630,001	\$ 3,958,376	\$ 306,716	\$ 6,895,093	CONF Attach D, Page 4, Line 15
2	Washington Allocation of Imputed Revenue for MWhs Held for Compliance (WCA Resources)	\$ 1,867,587	\$ 2,241,803	\$ 306,713	\$ 4,416,103	CONF Attach D, Page 4, Line 50
3	Adjustment for Washington RPS Compliance Requirement	\$ (2,693,196)	\$ (3,584,070)	\$ (516,548)	\$ (6,793,814)	CONF Attach D, Page 4, Line 55
	Subtotal Revenue	\$ 1,804,392	\$ 2,616,108	\$ 96,881	\$ 4,517,382	Subtotal Lines 1-3
4	Less: Credits Passed Back to Customers through Schedule 95	\$ (3,184,288)	\$ (4,726,012)	\$ (916,988)	\$ (8,827,288)	CONF Attach D, Page 6
5	Accumulated Interest through December 2013				\$ (477,874)	CONF Attach D, Page 6
6	Accumulated Interest through 2014 and Amortization Period				\$ (440,059)	CONF Attach D, Page 6
7	Total Washington-Allocated Revenue				\$ (5,227,840)	

Note 1 : Reference May 1, 2013 Compliance Filing, Attachment A, Page 1 of 6

Note 2: Reference May 1, 2014 Compliance Filing, Attachment A, Page 1 of 6

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

Washington-Allocated Revenue from Sale of 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	\$ 1,983,016	\$ 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	WA Allocated Booked Revenues (WCA Resources)											
9	WA Wind											
10	WCA Small Hydro											
11	WCA Large Hydro											
12	WCA Biomass											
13	Total WA Allocated Booked Revenues (WCA Resources)		\$ 423,144	\$ 442,127	\$ 418,654	\$ -	\$ -	\$ -	\$ 689,711	\$ 412,502	\$ 243,863	\$ 2,630,001
14	Imputed Revenue Calculations (Used for RPS Compliance)											
15	Held for Compliance in (WCA Wind)		22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
16	Washington % (CAGW)		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
17	Washington Allocation Considered Sold											
18	Average Price											
19	WA Allocated Imputed Revenues (WCA Wind)											
20	Held for Compliance in (WCA Small Hydro) ¹		22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
21	Washington % (CAGW)		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
22	Washington Allocation Considered Sold											
23	Average Price											
24	WA Allocated Imputed Revenues (WCA Wind)											
25	Held for Compliance in (WCA Large Hydro) ¹		22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
26	Washington % (CAGW)		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
27	Assumed Percentage Sold											
28	Washington Allocation Considered Sold											
29	Average Price											
30	WA Allocated Imputed Revenues (WCA Large Hydro)											
31	Held for Compliance in (WCA Large Hydro) ¹		22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
32	Washington % (CAGW)		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
33	Assumed Percentage Sold											
34	Washington Allocation Considered Sold											
35	Average Price											
36	WA Allocated Imputed Revenues (WCA Large Hydro)											
37	Held for Compliance in (WCA Biomass)		22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
38	Washington % (CAGW)		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
39	Assumed Percentage Sold											
40	Washington Allocation Considered Sold											
41	Average Price											
42	WA Allocated Imputed Revenues (WCA Biomass)											
43	Held for Compliance in (WCA Biomass)		22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%	22.2396%
44	Washington % (CAGW)		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 Sold											
47	Average Price											
48	WA Allocated Imputed Revenues (WCA Biomass)											
49	Total WA Allocated Imputed REC Revenues		\$ 305,424	\$ 212,542	\$ 259,830	\$ 188,296	\$ 217,186	\$ 122,252	\$ 193,113	\$ 228,340	\$ 140,602	\$ 1,867,257
50	Adjustment for Washington RPS Compliance Requirement											
51	Washington RPS Compliance Requirement (WCA Wind)											
52	Average Price											
53	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)
54	Total Washington Allocated Revenue		\$ 429,324	\$ 355,425	\$ 379,240	\$ (110,948)	\$ (82,058)	\$ (176,992)	\$ 583,581	\$ 341,508	\$ 85,321	\$ 1,804,392

CONFIDENTIAL PER PROTECTIVE ORDER IN UTC DOCKET UE-100749

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

Washington-Allocated Revenue from Sale of Renewable Energy Credits (RECs)

Docket UE 100749

Confidential Attachment D - Page 3

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	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	WA Allocated Booked Revenues (WCA Resources)													
8	Washington % (CAGW)	\$ 1,758,258	\$ 1,902,410	\$ 2,425,235	\$ 1,873,269	\$ 1,965,647	\$ 2,077,231	\$ -	\$ -	\$ -	\$ 3,118,893	\$ 1,234,051	\$ 1,239,419	\$ 17,644,412
9		22.4342%	22.342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	
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	Imputed Revenue Calculations (Used for RPS Compliance)													
17	Held for Compliance in (WCA Wind)													
18	Washington % (CAGW)	\$ 394,450	\$ 426,790	\$ 544,081	\$ 420,252	\$ 440,976	\$ 466,009	\$ -	\$ -	\$ -	\$ 699,698	\$ 276,849	\$ 289,270	\$ 3,958,376
19		22.4342%	22.342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	
20	Washington Allocation Considered Sold													
21	Average Price	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
22	WA Allocated Imputed Revenues (WCA Wind)													
23	Held for Compliance in (WCA Small Hydro) ¹													
24	Washington % (CAGW)	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	
25		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
26	WA Allocated Imputed Revenues (WCA Wind)													
27	Held for Compliance in (WCA Large Hydro) ¹													
28	Washington % (CAGW)	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	
29		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
30	WA Allocated Imputed Revenues (WCA Small Hydro)													
31	Held for Compliance in (WCA Large Hydro)													
32	Washington % (CAGW)	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	
33		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
34	WA Allocated Imputed Revenues (WCA Large Hydro)													
35	Held for Compliance in (WCA Biomass)													
36	Washington % (CAGW)	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	
37		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
38	WA Allocated Imputed Revenues (WCA Biomass)													
39	Held for Compliance in (WCA Large Hydro)													
40	Washington % (CAGW)	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	
41		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
42	WA Allocated Imputed Revenues (WCA Large Hydro)													
43	Held for Compliance in (WCA Biomass)													
44	Washington % (CAGW)	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	
45		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
46	WA Allocated Imputed Revenues (WCA Biomass)													
47	Held for Compliance in (WCA Large Hydro)													
48	Washington % (CAGW)	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	\$ 22,434.2%	
49		100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
50	Total WA Allocated Imputed REC Revenues	\$ 222,883	\$ 186,988	\$ 280,363	\$ 195,271	\$ 237,164	\$ 253,464	\$ 158,901	\$ 135,802	\$ 86,190	\$ 170,272	\$ 122,917	\$ 191,390	\$ 2,241,803
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 Wind)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (298,673)	\$ (3,584,070)
55														
56	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

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

Redacted - Confidential Attachment D - Page 4

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

Confidential Attachment D - Page 4

Line	Description	Jan 2013	Feb 2013	Mar 2013	Apr 2013	May 2013	Jun 2013	Jul 2013	Aug 2013	Sep 2013	Oct 2013	Nov 2013	Dec 2013	2013 Total	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	W Washington % (CAGW)	\$ 47,466	\$ 41,639	\$ 20,612	\$ 53,096	\$ -	\$ 18,545	\$ 134,524	\$ 136,096	\$ 173,386	\$ 87,552	\$ 37,472	\$ 278,693	\$ 1,366,348	\$ 30,836,516
8	WA Allocated Booked Revenues (WCA Resources)	22.4342%	22.4342%	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	WA Wind														
10	WCA Small Hydro														
11	WCA Large Hydro														
12	WCA Biomass														
13	Total WA Allocated Booked Revenues (WCA Resources)	\$ 10,649	\$ 9,341	\$ 4,624	\$ 11,912	\$ -	\$ 4,160	\$ 30,179	\$ 30,532	\$ 38,898	\$ 19,642	\$ 84,070	\$ 62,710	\$ 306,716	\$ 6,892,093
14	WA Allocated Booked Revenues (WCA Wind)	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%	22.4342%
15	WA Allocated Booked Revenues (WCA Wind)	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
16	Imputed Revenue Calculations (Used for RPS Compliance)														
17	Held for Compliance in (WCA Wind)														
18	Washington % (CAGW)														
19	Assumed Percentage Sold														
20	Washington Allocation Considered Sold														
21	Average Price														
22	WA Allocated Imputed Revenues (WCA Wind)														
23	WA Allocated Imputed Revenues (WCA Wind)														
24	WA Allocated Imputed Revenues (WCA Wind)														
25	WA Allocated Imputed Revenues (WCA Wind)														
26	Held for Compliance in (WCA Small Hydro) ¹														
27	Washington % (CAGW)														
28	Assumed Percentage Sold														
29	Washington Allocation Considered Sold														
30	Average Price														
31	WA Allocated Imputed Revenues (WCA Small Hydro)														
32	WA Allocated Imputed Revenues (WCA Small Hydro)														
33	Held for Compliance in (WCA Large Hydro)														
34	Washington % (CAGW)														
35	Assumed Percentage Sold														
36	Washington Allocation Considered Sold														
37	Average Price														
38	WA Allocated Imputed Revenues (WCA Large Hydro)														
39	WA Allocated Imputed Revenues (WCA Large Hydro)														
40	WA Allocated Imputed Revenues (WCA Large Hydro)														
41	Held for Compliance in (WCA Biomass)														
42	Washington % (CAGW)														
43	Assumed Percentage Sold														
44	Washington Allocation Considered Sold														
45	Average Price														
46	WA Allocated Imputed Revenues (WCA Biomass)														
47	WA Allocated Imputed Revenues (WCA Biomass)														
48	WA Allocated Imputed Revenues (WCA Biomass)														
49	Total WA Allocated Imputed REC Revenues	\$ 22,260	\$ 30,661	\$ 29,011	\$ 38,362	\$ 26,424	\$ 23,193	\$ 23,799	\$ 18,444	\$ 25,457	\$ 14,164	\$ 23,786	\$ 31,151	\$ 306,713	\$ 4,416,103
50	Adjustment for Washington RPS Compliance Requirement														
51	Washington RPS Compliance Requirement (WCA Wind)														
52	Average Price														
53	Subtract Revenue for Washington RPS Compliance (WCA Wind)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)	\$ (43,046)
54	Total Washington Allocated Revenue	\$ (10,137)	\$ (3,043)	\$ (9,410)	\$ 7,238	\$ (16,621)	\$ (15,693)	\$ 10,932	\$ 5,930	\$ 21,309	\$ (9,240)	\$ 64,810	\$ 50,816	\$ 36,881	\$ 4,517,382

CONFIDENTIAL PER PROTECTIVE ORDER IN UTC DOCKET UE-100749

WCA REC Transaction Summary (CY 2011 - CY 2013)
WA Docket UE 100749

	Actual	Actual	Actual
	2011	2012	2013
West Control Area RPS Eligible Wind Generation (MWh)			
1 LEANING JUNIPER I			
2 GOODNOE HILLS			
3 MARENKO			
4 MARENKO 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	2013
West Control Area RPS Eligible Small Hydro Generation (MWh)			
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	2013
West Control Area RPS Eligible Hydro Generation (MWh)			
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	2013
West Control Area RPS Eligible Biomass Generation (MWh)			
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			

	MWh	
64 Washington Retail Sales	3,984,631	
65 Calendar Year 2010 (Actual)	3,984,631	
66 Calendar Year 2011 (Actual)	4,005,863	
67 Calendar Year 2012 (Actual)	4,041,898	
68 Calendar Year 2013 (Actual)	3,971,579	
69 Washington RPS Compliance Requirements	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
71 1/1/13 - 3% (2013 Generation Eligible for Compliance)	120,202	3% of Average 2012 and 2013 Retail Sales

Washington REC Revenue Tracker
Net Liability Summary

Interest Rate **6.72% After Tax WACC approved in Washington per UE 111190**
Interest Rate **6.42% After Tax WACC approved in Washington per UE 130043**

		Actual	Proposed Amort.			
	Beginning Balance	Revenues	Sch. 95 Credits	(Sch. 95 Surcharge)	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)	(10,137)	(495,982)		(21,894)	(4,184,581)
Feb-13	(4,184,581)	(3,043)	(371,212)		(24,482)	(4,583,318)
Mar-13	(4,583,318)	(9,410)	(49,794)		(25,832)	(4,668,354)
Apr-13	(4,668,354)	7,228	-		(26,123)	(4,687,248)
May-13	(4,687,248)	(16,621)	-		(26,295)	(4,730,165)
Jun-13	(4,730,165)	(15,693)	-		(26,533)	(4,772,390)
Jul-13	(4,772,390)	10,932	-		(26,695)	(4,788,153)
Aug-13	(4,788,153)	5,930	-		(26,797)	(4,809,020)
Sep-13	(4,809,020)	21,309	-		(26,871)	(4,814,581)
Oct-13	(4,814,581)	(9,240)	-		(26,988)	(4,850,809)
Nov-13	(4,850,809)	64,810	-		(26,983)	(4,812,982)
Dec-13	(4,812,982)	50,816	-		(25,615)	(4,787,781)
Jan-14	(4,787,781)	-	-		(25,616)	(4,813,396)
Feb-14	(4,813,396)	-	-		(25,753)	(4,839,149)
Mar-14	(4,839,149)	-	-		(25,891)	(4,865,040)
Apr-14	(4,865,040)	-	-		(26,029)	(4,891,069)
May-14	(4,891,069)	-	-		(26,168)	(4,917,237)
Jun-14	(4,917,237)	-	-		(26,308)	(4,943,545)
Jul-14	(4,943,545)	-	-		(26,449)	(4,969,994)
Aug-14	(4,969,994)	-	-		(26,591)	(4,996,585)
Sep-14	(4,996,585)	-	-		(26,733)	(5,023,318)
Oct-14	(5,023,318)	-	-		(26,876)	(5,050,194)
Nov-14	(5,050,194)	-	-		(13,510)	(5,063,704)
*Nov-14	(5,063,704)	-	-	217,827	(13,255)	(4,859,132)
Dec-14	(4,859,132)	-	-	435,653	(24,832)	(4,448,310)
Jan-15	(4,448,310)	-	-	435,653	(22,634)	(4,035,291)
Feb-15	(4,035,291)	-	-	435,653	(20,424)	(3,620,062)
Mar-15	(3,620,062)	-	-	435,653	(18,203)	(3,202,611)
Apr-15	(3,202,611)	-	-	435,653	(15,969)	(2,782,927)
May-15	(2,782,927)	-	-	435,653	(13,724)	(2,360,998)
Jun-15	(2,360,998)	-	-	435,653	(11,466)	(1,936,811)
Jul-15	(1,936,811)	-	-	435,653	(9,197)	(1,510,355)
Aug-15	(1,510,355)	-	-	435,653	(6,915)	(1,081,617)
Sep-15	(1,081,617)	-	-	435,653	(4,621)	(650,585)
Oct-15	(650,585)	-	-	435,653	(2,315)	(217,247)
Nov-15	(217,247)	-	-	217,827	(580)	(0)
		4,517,382	(8,827,288)	5,227,840	(917,933)	

* Proposed effective date is November 16, 2014.

Attachment E

PACIFIC POWER & LIGHT COMPANY

WN U-75

Second Revision of Sheet No. 95.1
Canceling First Revision of Sheet No. 95.1

Schedule 95 RENEWABLE ENERGY REVENUE ADJUSTMENT

APPLICABLE:

All bills calculated in accordance with schedules contained in presently effective Tariff WN. No. U-75 shall have added an amount equal to the product of all kilowatt-hours of use multiplied by the following cents per kilowatt-hour. (C)

Schedule 15	0.095 cents	(I)
Schedule 16	0.143 cents	(I)
Schedule 17	0.143 cents	(I)
Schedule 18	0.143 cents	(I)
Schedule 24	0.129 cents	(I)
Schedule 33	0.125 cents	(I)
Schedule 36	0.125 cents	(I)
Schedule 40	0.124 cents	(I)
Schedule 47T	0.118 cents	(I)
Schedule 48T (Secondary, Primary)	0.118 cents	(I)
Schedule 48T (Primary Dedicated Facilities >30,000 kW)	0.112 cents	(I)
Schedule 51	0.095 cents	(I)
Schedule 52	0.095 cents	(I)
Schedule 53	0.095 cents	(I)
Schedule 54	0.095 cents	(I)
Schedule 57	0.095 cents	(I)

Issued: October 3, 2014
Advice No. 14-06

Effective: November 16, 2014

Issued by Pacific Power & Light Company

By:  R. Bryce Dalley

Title: Vice President, Regulation