

June 1, 2015

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

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

RE: 2015 Annual Renewable Portfolio Standard Report

In accordance with RCW 19-285-040 and WAC 480-109-210(1), Pacific Power & Light Company, a division of PacifiCorp (Pacific Power or Company), submits its 2015 Annual Renewable Portfolio Standard (RPS) Report to the Washington Utilities and Transportation Commission to report the Company's progress in meeting the targets established in RCW 19.285.040.

Pacific Power requests confidential treatment for Attachment A and the work papers in accordance with WAC 480-07-160. The documents labeled as confidential include proprietary cost data, commercially sensitive load and resource projections, confidential market analyses and business projections, and confidential information related to renewable energy credits and/or compliance with RCW 19.285. This confidential business information is of significant commercial value, which could expose the Company to competitive injury if disclosure is unrestricted. Therefore, the Company requests confidential treatment on the basis that the documents contain "valuable commercial information, including trade secrets or confidential marketing, cost, or financial information, or customer-specific usage and network configuration and design information," as provided in RCW 80.04.095 and in accordance with WAC 480-07-160(2)(c).

In compliance with RCW 19.285.070(3) and WAC 480-109-210(4), the Company will post the redacted version of the Renewable Report on its website to make the information available to customers.

It is respectfully requested that any formal correspondence and staff requests regarding these reports 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, OR 97232


Washington Utilities & Transportation Commission

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Please direct informal questions to Ariel Son, Manager, Regulatory Projects, at (503) 813-5410.

Sincerely,


R. Bryce Dalley
Vice President, Regulation

Enclosures



Pacific Power & Light Company

Washington

Annual Renewable Portfolio Standard Report

June 1, 2015

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Introduction

Pacific Power & Light Company, a division of PacifiCorp (PacifiCorp or Company) submits this 2015 Annual Renewable Portfolio Standard Report (Renewable Report) to the Washington Department of Commerce (Commerce) and Washington Utilities and Transportation Commission (WUTC or Commission) in accordance with reporting requirements established as part of the Energy Independence Act (EIA). The report is consistent with RCW 19.285.070 which states, in relevant part:

- (1) On or before June 1, 2012, and annually thereafter, each qualifying utility shall report to the department on its progress in the preceding year in meeting the targets established in RCW 19.285.040, including expected electricity savings from the biennial conservation target, expenditures on conservation, actual electricity savings results, the utility's annual load for the prior two years, the amount of megawatt-hours needed to meet the annual renewable energy target, the amount of megawatt-hours of each type of eligible renewable resource acquired, the type and amount of renewable energy credits acquired, and the percent of its total annual retail revenue requirement invested in the incremental cost of eligible renewable resources and the cost of renewable energy credits.*
- (2) A qualifying utility that is an investor-owned utility shall also report all information required in subsection (1) of this section to the commission, and all other qualifying utilities shall also make all information required in subsection (1) of this section available to the auditor.*

This report is consistent with the collaborative workshop documents addressing annual reporting requirements, in Docket UE-110523, Order 01 in Docket UE-120813, and Order 1 in Docket UE-140802.

This report demonstrates that PacifiCorp met the 2014 renewable energy target of acquiring three percent of the Company's Washington retail load with a combination of eligible renewable resources and renewable energy credits (RECs). This report also demonstrates that the Company is positioned to meet the 2015 renewable energy target with a combination of eligible renewable resources and RECs to supply at least three percent of its average Washington retail load.

Executive Summary

Under RCW 19.285.040(2)(a), each qualifying utility shall use eligible renewable resources, acquire equivalent RECs, or a combination of both, to meet annual targets. As demonstrated in this report, the Company met the targets in accordance with WAC 480-109-200(1)(a). The Company met the 2014 renewable energy target with a combination of eligible renewable resources and RECs and the Company is positioned to use eligible renewable resources and RECs to supply at least three percent of its Washington load to satisfy the 2015 renewable energy target. The Company plans to meet its 2015 renewable energy target with a combination of RECs from company-owned resources, REC purchases, and eligible renewable resources, including hydroelectric facilities that were upgraded after March 1999.

A summary of the Company's 2014 and 2015 renewable resource targets and eligible renewable resources and RECs are provided below:

Table 1

PacifiCorp Renewable Target, Eligible Resource and RECs		
	2014	2015
Average Retail Sales (MWh)	4,117,646	3,996,929
Percentage Target	3%	3%
Renewable Target	122,019	123,155
Qualifying Resources (MWh) & RECs	122,019	123,155

The Company does not intend to rely on any of the alternative compliance mechanisms provided in WAC 480-109-220 for meeting either the 2014 or 2015 renewable energy targets.

Annual Load for Previous Two Years and Renewable Energy Target

Under RCW 19.285.040(2)(c) and WAC 480-109-200(1)(a), a utility must calculate its annual target based on its average load for the previous two years. Accordingly, using the average of the Washington annual retail loads for the previous two years, Table 2 calculates the annual renewable targets for 2014 and 2015.

Table 2

Target Year 2014	
Prior Year Retail Sales (2012)	4,041,898 MWh
Prior Year Retail Sales (2013)	4,092,688 MWh
Average Retail Sales	4,067,293 MWh
Percentage Target	3%
Renewable Target	122,019 MWh/RECs
Target Year 2015	
Prior Year Retail Sales (2013)	4,092,688 MWh
Prior Year Retail Sales (2014)	4,117,646 MWh
Average Retail Sales	4,105,167 MWh
Percentage Target	3%
Renewable Target	123,155 MWh/RECs

Renewable Energy Acquired to Meet Renewable Energy Target

The Company met its 2014 renewable resource target and plans to meet its 2015 renewable resource target with a combination of RECs from company-owned and third-party wind facilities (Power Purchase Agreements) and eligible renewable resources such as hydroelectric facilities with upgrades completed after March 1999.

The Company is submitting the Commission's RPS Report Tool as Confidential Attachment A. The RPS Report Tool details the renewable resource target for 2014 and 2015 and the RECs and renewable resources to meet the 2014 and 2015 targets.

The Company will use RECs from the following Company-owned facilities or power purchase agreements:

Table 3

Resource Name	Fuel Source
Goodnoe Hills	Wind
Leaning Juniper	Wind
Marengo I	Wind
Marengo II	Wind
Top of the World	Wind

These five wind facilities, other than Top of the World, are located in the Pacific Northwest. Top of the World is located in Wyoming. Descriptions of the projects are referenced in the Supporting Documents for Renewable Report section of this report.

Additionally, the Company identified upgrades to hydroelectric facilities located in the Pacific Northwest that were completed after March 31, 1999, listed in Table 4 below.

Table 4

Resource Name	Fuel Source
Prospect 2	Water – Hydro Upgrade 1999
Lemolo 1	Water – Hydro Upgrade 2003
JC Boyle	Water – Hydro Upgrade 2005
Lemolo 2	Water – Hydro Upgrade 2009

The Company performed analyses to determine the incremental energy associated with upgrades to hydroelectric facilities, consistent with Method two, as identified in WAC 480-109-200(7)(c). The methodology is described in more detail in Attachment B. This methodology is consistent with the methodology the Company submitted to the Oregon Department of Energy to certify these facilities and calculate the percentage of the incremental energy for the Oregon RPS program. The Company performed an analysis of the incremental energy for upgrades to hydroelectric facilities that includes actual generation data from 2007 through 2012. The Company re-submitted the analysis to the Oregon Department of Energy in December 2013 and the Oregon Department of Energy

approved the updated incremental hydropower efficiency percentages, effective January 2014. The Company is providing the analyses in Confidential Work Papers—PacifiCorp Hourly Incremental Hydro Analyses.

PacifiCorp has two contracts for REC-only transactions executed before January 1, 2012.¹ The counterparties have provided RECs from Washington RPS-eligible resources.

The Company also has executed power purchase contracts for the output from facilities owned by Grant County Public Utility District (PUD). Grant PUD has determined the average amount of incremental hydroelectric generation associated with the Wanapum Dam Future Unit Fish Bypass and the Priest Rapids Dam Top Spill for Fish Passage.

WAC 480-109-200(3) requires WREGIS registration of all eligible hydropower generation and all RECs used for utility compliance with the renewable resource target. As of the time of this report, Wanapum Dam and Priest Rapids Dam have not been registered in WREGIS. To the extent these resources are not registered in WREGIS and consistent with the Commission's newly-adopted rule, the Company will not use generation from these resources for compliance with its renewable resource target until these resources are registered in WREGIS. The Company is working with Grant PUD to encourage WREGIS registration of the aforementioned facilities.

Washington Senate Bill 5400 was passed in April 2013, allowing renewable resources located in states served by PacifiCorp to qualify as eligible to meet Washington's EIA. The Company is disclosing the renewable resources located in states served by PacifiCorp and situated outside the Northwest. PacifiCorp owns or has contracts with counterparties that own the renewable resources listed in Table 5. In the event of any shortfall in renewable energy generation in 2014 or future years, PacifiCorp may use RECs or renewable generation from these resources.

¹ One of the two contracts was executed for RECs used toward compliance years 2012 and 2013. The other provided RECs for compliance year 2014.

Table 5

Resource Name	Location	Type	Fuel Source
Campbell Hill-Three Buttes	Wyoming	PPA	Wind
Chevron Casper Wind Farm	Wyoming	PPA	Wind
Dunlap I	Wyoming	Utility Owned	Wind
Foote Creek I	Wyoming	Utility Owned	Wind
Glenrock Wind	Wyoming	Utility Owned	Wind
Glenrock Wind III	Wyoming	Utility Owned	Wind
High Plains	Wyoming	Utility Owned	Wind
McFadden Ridge	Wyoming	Utility Owned	Wind
Mountain Wind Power	Wyoming	PPA	Wind
Mountain Wind Power II	Wyoming	PPA	Wind
Rock River I	Wyoming	PPA	Wind
Rolling Hills Wind	Wyoming	Utility Owned	Wind
Seven Mile Hill Wind I	Wyoming	Utility Owned	Wind
Seven Mile Hill Wind II	Wyoming	Utility Owned	Wind
Top of the World	Wyoming	PPA	Wind
Pioneer	Utah	Utility Owned	Water – Hydro Upgrade 1999
Big Fork	Montana	Utility Owned	Water – Hydro Upgrade 2001
Oneida	Idaho	Utility Owned	Water – Hydro Upgrade 2004
Cutler	Utah	Utility Owned	Water – Hydro Upgrade 2007

In the following pages is the Company’s report submitted to Commerce on June 1, 2015, that provides a summary of the forecasted number of megawatt-hours and RECs to meet the 2015 compliance target.

Energy Independence Act (I-937) Commerce Renewable Report - 2015

Energy Independence Act (EIA) Renewable Energy Report 2015

Utility	Pacific Power & Light Company
Report Date	June 1, 2015
Utility Contact Name/Dept	Natasha Siores
Phone	(503) 813-6583
Email	natasha.siores@pacifiCorp.com

- 2015 Compliance Method: RPS Target [RCW 19.285.040(2)(a)]
 Resource Cost [RCW 19.285.050]
 No Load Growth [RCW 19.285.040(2)(d)]

Loads and Resources	
2013 Annual Load (MWh)	4,092,688
2014 Annual Load (MWh)	4,117,646
Average of 2013 & 2014 Annual Loads (MWh)	4,105,167
2015 Renewable Target (% of load)	3%
2015 Eligible Renewable Energy Target (MWh)	123,155
Eligible Renewables Acquisitions / Investments (MWh)	123,155

Expenditures on Renewable Resources and RECs - 2015	
Amount invested in incremental cost of eligible renewable resources and the cost of RECs	\$1,038,885
Total annual retail revenue requirement - 2015	\$328,641,634
Investment in renewables and RECs as a percent of retail revenue requirement	0.3%

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
Water	Wind	Solar	Geothermal	Landfill Gas	Wave, Tidal	Gas from Sewage	Biodiesel	Biomass	Apprentice Labor	Distributed Generation
MWh	MWh	MWh	MWh	MWh	MWh	MWh	MWh	MWh	MWh equiv.	MWh equiv.
1,634	-	-	-	-	-	-	-	-	-	-
Renewable Energy Credits (MWh)	121,521	-	-	-	-	-	-	-	-	-
Total Renewables (MWh)	121,521	-	-	-	-	-	-	-	-	-

2015 Reporting Year:

This renewable energy report summarizes the eligible renewables resources and renewable energy credits (RECs) that the utility has acquired by January 1, 2015 for the purpose of meeting its Energy Independence Act (EIA) renewables target for 2015. The actual resources and RECs used to comply with the 2015 EIA target may vary from those reported here. Utilities will report in June of 2017 on the actual results for 2015.

Compliance Methods:

The EIA provides three compliance methods for utilities:

- Meet the renewable energy target using any combination of renewable resources and RECs. The target for 2015 is 3% of the utility's load
- Invest at least 4% of the utility's annual revenue requirement in the incremental cost of renewable resources and RECs.
- Invest at least 1% of its annual revenue requirement in renewable resources and RECs. This option is available only to certain utilities that are not growing.

All utilities must report the renewable resources and RECs acquired for the 2015 target year. Utilities that elect to use a compliance method based on renewable investments must provide additional information demonstrating compliance with that method.

NOTE: This is a general explanation of the renewable energy requirements of the Energy Independence Act, intended to help members of the public understand the information reported by the utility. Consult Chapter 19.285 RCW and Chapter 194-37 WAC for details.

Energy Independence Act (I-937) Commerce Renewable Report – Continued

Utility	Pacific Power & Light Company
Target Year	2015

Documentation of the calculation and inputs for percentage of revenue requirement invested in renewables:

2015 revenue requirement is pro-rated from Dockets UE-130043 and UE-140762. For a description of incremental cost for resources, please refer to the renewable report for Pacific Power & Light Company, a division of PacifiCorp filed with the Washington Utilities and Transportation Commission on June 1, 2015.

Other notes and explanations:

- 2015 data is an estimate and subject to change.

Alternative Compliance

Under WAC 480-109-210(2)(b), the utility must state in its report if it is relying upon one of the alternative compliance mechanisms provided in WAC 480-109-220 instead of meeting its renewable resource target. The Company does not anticipate investing at least four percent of its total annual retail revenue requirement on the incremental costs of eligible renewable resources, RECs, or a combination of both.

Further, the Company does not plan to rely on any other alternative compliance mechanisms to meet its renewable resource targets for 2014 or 2015.

Resource Cost Compared to Annual Retail Revenue Requirement

Under RCW 19.285.070(1), a utility must report the percent of its total annual retail revenue requirement invested in the incremental cost of eligible renewable resources and the cost of RECs. Similarly, under WAC 480-109-210, a utility must report the incremental cost of eligible renewable resources and RECs, and the ratio of this investment relative to the utility's total annual retail revenue requirement. The incremental cost of an eligible renewable resource is defined in RCW 19.285.050(1)(b) as the difference between the levelized delivered cost of the eligible renewable resource, regardless of ownership, compared to the levelized delivered cost of an equivalent amount of reasonably available substitute resources that do not qualify as eligible renewable resources, where the resources being compared have the same contract length or facility life.

With the adoption of General Order R-578 in Docket UE-131723, the Commission revised rules implementing RCW 19.285, the EIA, including the application of a new methodology for calculating incremental cost. The Company performed the incremental cost calculations as defined in WAC 480-109-210.

REC Costs for Wind Resources

The estimated cost of the RECs from renewable wind resources is the calculated levelized cost of each eligible renewable resource at the time of acquisition, compared to an equivalent amount of the lowest-reasonable-cost resource available to the utility at the time of the eligible resource's acquisition.²

REC Costs for REC-only Purchases

The cost of RECs from the REC-only purchase is based on the contractual price set-forth in the applicable bilateral agreement between the Company and the counterparty.

Incremental Costs for Renewable Energy from Incremental Hydro Upgrades

The incremental cost of the eligible incremental renewable energy from owned hydro and purchase power agreements is deemed to be zero.

The majority of the equipment replacements associated with the Company-owned hydroelectric facilities were made in conjunction with facility overhauls; the incremental cost associated with the equipment replacements is zero on the economic basis that the marginal cost of gaining output was less than the cost of an equivalent alternative. The upgrades to the hydroelectric facilities were economic decisions, as the upgrades were

² The cost of RECs from PacifiCorp's resource(s) located outside of the West Control Area are not included in Washington customers' rates. For illustrative purposes and to determine the ratio of incremental cost to revenue requirement, resource costs *outside* the West Control Area are calculated using the weighted average cost of the resources *within* the West Control Area (Goodnoe Hills, Leaning Juniper, Marengo I and Marengo II).

made to increase efficiency and to prevent forced outages from old and less reliable equipment. As such, the Company would have made the upgrades regardless of the RPS requirement.

Confidential Work Papers—PacifiCorp Resource Cost Analysis provides the key assumptions and analysis that the Company used to forecast the estimated resource costs associated with the renewable resources and RECs for the target years 2014 and 2015.

Revenue Requirement

The revenue requirement amounts are from recent general rate cases. The 2014 revenue requirement is \$321,059,953 from Docket UE-130043, and the 2015 revenue requirement is \$328,641,634,³ prorated from Dockets UE-130043 and UE-140762.

Resource Costs Compared to Revenue Requirement

Table 6 shows the expected Washington-allocated resource costs (incremental cost of eligible renewable resources and the cost of RECs) compared to the annual revenue requirement for 2014 and 2015.

Table 6

Calendar Year	Total Washington Allocated Resource Costs	Washington Annual Revenue Requirement	% of Washington Expected Allocated Resource Costs to Annual Revenue Requirement
2014	\$ 931,097	\$321,059,953	0.0029%
2015	\$ 1,038,885	\$328,641,634	0.0032%

Based on this analysis, the Company will not exceed the four percent threshold.

³ Rates approved in Docket No. UE-130043 in effect through March 30, 2015: \$321,059,953 *3/12 = \$80,264,988 plus the rates approved in Docket No. UE-140762 in effect from March 31, 2015, forward: \$331,168,861 *9/12 = \$248,376,646.

Prior Year Progress

As evidenced in this report, the Company met its Washington 2014 renewable compliance target with a combination of RECs from eligible renewable resources, unbundled REC purchases and renewable energy from hydroelectric facilities with upgrades completed after March 1999. The Company has set aside the WREGIS certificates for the 2014 compliance target and upon Commission approval, the Company will retire these WREGIS certificates. The Company is providing a listing of the WREGIS certificates in Confidential Work Papers—WREGIS Certificates for Washington Compliance for 2014.

The Company will invest less than four percent of its total annual retail Washington revenue requirement on the incremental costs of eligible renewable resources, RECs, or a combination of both for 2014.

Further, the Company does not rely on any other alternative compliance mechanisms to meet its renewable resource targets for 2014.

Current Year Progress

The Company is positioned to meet its Washington 2015 renewable compliance target with a combination of RECs from eligible renewable resources, and renewable energy from hydroelectric facilities with upgrades completed after March 1999. The Company has also identified, to date, the WREGIS certificates that it intends to use toward the 2015 compliance target. The Company is providing a listing of the WREGIS certificates in Confidential Work Papers—WREGIS Certificates for Washington Compliance for 2015.

The Company will invest less than four percent of its total annual retail Washington revenue requirement on the incremental costs of eligible renewable resources, RECs, or a combination of both for 2015.

Further, the Company does not rely on any other alternative compliance mechanisms to meet its renewable resource targets for 2015.

Supporting Documents for Renewable Report

Provided below are links to supporting documents in support of the Company's Renewable Report.

1. Wind Project Fact Sheets/Information

Goodnoe Hills

http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/EnergyGeneration_FactSheets/PP_GFS_Goodnoe_Hills.pdf

Leaning Juniper

http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/EnergyGeneration_FactSheets/PP_GFS_Leaning_Juniper.pdf

Marengo

http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/EnergyGeneration_FactSheets/PP_GFS_Marengo.pdf

Marengo II

http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/EnergyGeneration_FactSheets/PP_GFS_Marengo_II.pdf

Top of the World

<http://www.pacificorp.com/es/re/totw.html>

2. Collaborative group documents from workshops conducted at the Commission and through a number of multiple issues-specific teleconference meetings, filed in Docket UE-110523.

<http://www.utc.wa.gov/docs/Pages/DocketLookup.aspx?FilingID=110523>

Listing of Attachments

Attachment A (Confidential) – Washington Utilities and Transportation
Commission RPS Report Tool

Attachment B – PacifiCorp Description of Incremental Hydro Methodology and
Oregon Department of Energy Correspondence on Updated Certification for
Efficiency Upgrades at Eleven Hydropower Generating Units

**PacifiCorp
Annual Report Requirements
RCW 19.285.070
Washington Renewable Report
June 1, 2015**

Attachment A

CONFIDENTIAL

**Washington Utilities and Transportation Commission
RPS Report Tool**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Pacific Power & Light Company

Renewable Report

RPS Reporting Tool

CONFIDENTIAL

June 1, 2015

General Instructions:

- Grey shading indicates cells where information is not required
- Yellow shading indicate cells where inputs are entered
- Green shading indicate cells with dropdown lists
- White shading indicate formulated cells
- Blue shading indicates summary calculations

"Compliance Summary" Worksheet

Enter "X" When Complete	Checklist Item	Cell/Row Description	Units	Cell/Row	Comments
	1	Reporting Entity	Text	B2	Enter the name of the reporting entity
	2	Reporting Date	Year	B4	Enter the date the report is submitted
	3	Delivered Load to Retail Customers	MWh	B7:E7	Enter the MWh delivered to customers

"Facility Detail" Worksheet

Enter "X" When Complete	Checklist Item	Cell/Row Description	Units	Cell/Row	Comments
Instructions in the section are for the cells B2:F31. Each row represents a different facility.					
	1	Facility Name	Text	B2:B31	Enter the name of the qualifying facility or contract
	2	WREGIS ID	Text	C2:C31	Enter the WREGIS ID for the qualifying facility
	3	Facility Type	Toggle	D2:D31	Select the generation type for the qualifying facility
	4	Extra Apprenticeship Credit Eligibility	Toggle	E2:E31	For facilities that qualify for extra apprenticeship credits select "Eligible". Select "Not Eligible for non-qualifying facilities.
	5	Distributed Generation Eligibility	Toggle	F2:F31	For facilities that qualify for distributed generation select "Eligible". Select "Not Eligible for non-qualifying facilities.

Enter "X" When Complete	Checklist Item	Cell/Row Description	Units	Cell/Row	Comments
Instructions in this section identify the input locations for the 1st facility found in the "Facility Detail" worksheet. Inputs for facilities 2 through 30, also found in the "Facility Detail" worksheet, are identical to facility 1.					
	6	Total MWh Produced from Facility	Number	D39:F39	Enter the annual MWh output from the qualifying facility
	7	Percent of MWh Qualifying	%	D40:F40	Enter the percent of MWh produced that are eligible for meeting RCW 19.285
	8	Percent of Qualifying MWh Allocated to WA State Compliance	%	D41:F41	Enter the percent of qualifying MWh used for compliance with RCW 19.285. Used for facilities that are utilized for RPS compliance in two or more states.
	9	Quantity of RECs from MWh Sold	Number	D50:F50	Enter the annual amount of RECs sold. For Multi-Jurisdictional Utilities, enter in annual WA allocated amount of RECs sold.
	10	Bonus Incentives Transferred	Number	D51:F51	Enter the annual amount of transferred RECs procured from bonus incentives
	11	Bonus Incentives Not Realized	Number	D52:F52	Enter the annual number of bonus incentives that were not realized
	12	2011 Surplus Applied to 2012	Number	D56	Enter the amount of RECs procured in 2011 used for compliance in 2012
	13	2012 Surplus Applied to 2011	Number	E57	Enter the amount of RECs procured in 2012 used for compliance in 2011
	14	2012 Surplus Applied to 2013	Number	E58	Enter the amount of RECs procured in 2012 used for compliance in 2013
	15	2013 Surplus Applied to 2012	Number	F59	Enter the amount of RECs procured in 2013 used for compliance in 2012
	16	Adjustment for Events Beyond Control	Number	D62:F62	Enter the annual MWh not produced due to events beyond control as outlined in RCW 19.285.040 (2)(i)

Reporting Entity:

Pacific Power & Light Company

Reporting Date:

June 1, 2015

RCW 19.285 Compliance Need

	2010	2011	2012	2013	2014	2015
Delivered Load to Retail Customers (MWh)	3,984,631	4,005,863	4,041,898	4,092,688	4,117,646	
WA State RCW 19.285 Requirement		0%	3%	3%	3%	3%
Quantity Required for Compliance		-	119,857	120,716	122,019	

Eligible Quantity Acquired

	2010	2011	2012	2013	2014	2015
Qualifying MWh Allocated to WA		104,826	107,711	107,159	164,417	
Quantity from Non REC Eligible Generation		-	-	-	-	-
Total Quantity Available for RCW 19.285 Compliance		104,826	107,711	107,159	164,417	

Sales and Transfers

	2010	2011	2012	2013	2014	2015
Quantity of RECs Sold		-	-	-	-	-
Bonus Incentives Transferred		-	-	-	-	-
Bonus Incentives Not Realized		-	-	-	-	-
Total Sold / Transferred / Unrealized		-	-	-	-	-

Adjustments

	2010	2011	2012	2013	2014	2015
2011 Surplus Applied to 2012		(104,826)	104,826			
2012 Surplus Applied to 2011		-	-			
2012 Surplus Applied to 2013			(92,680)	92,680		
2013 Surplus Applied to 2012			-	-	Note 1	
2013 Surplus Applied to 2014				(79,122)	79,122	
2014 Surplus Applied to 2013					-	
2014 Surplus Applied to 2015					(121,521)	121,521
2015 Surplus Applied to 2014						
2015 Surplus Applied to 2016						
Net Surplus Adjustments		(104,826)	12,146	13,558	(42,399)	

Adjustment for Events Beyond Control		-	-	-	-	-
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	2010	2011	2012	2013	2014*	2015*
RCW 19.285 Compliance Surplus / (Deficit)		(0)	(0)	0	(0)	0

* Any surplus shown in 2015 or 2016 may be sold or used for compliance in subsequent years. Compliance deficits shown in 2016 may be filled by REC procurement from subsequent years.

Note 1: 2013 surplus Applied to 2014 is 79,121 RECs. 79,122 reflects rounding in Facility Detail tab. Target amount of 122,019 RECs will be retired for CY2014.

In both the "Compliance Summary" and "Facility Detail" worksheets, utilities may need to protect commercially sensitive information by use of the CONFIDENTIAL designation.

PACIFICORP Notes and Assumptions

Retail Sales:

2010, 2011, 2012 and 2013, 2014 actual retail sales. 2015 load forecast based on 2015 IRP.

Facility Generation:

2011 -2014 is based on actual generation or REC purchase data. 2015 is the generation forecast as of April 2015.

The Company uses one of three patterning methods to model wind resources. First, and if the appropriate data is available, historical monthly/seasonal patterns are developed using hourly data. This is the Company's preferred method. Second, if historical information is unavailable, but hourly data from wind site studies is, on/off peak engineering estimate patterns are developed. Third, if neither of the first two types of data is available, Energy Information Agency (EIA) wind patterning is used.

REC Sales:

The company does not plan to sell any excess RECs and will hold any excess RECs and apply to a future year target.

Facility Name:	Facility WREGIS ID:	Facility Type	Extra Apprenticeship Credit Eligibility:	Distributed Generation Bonus Eligibility:	Online Date:
Goodnoe Hills	W536	Wind	Not Eligible	Not Eligible	31-May-08
Leaning Juniper	W200	Wind	Not Eligible	Not Eligible	14-Sep-06
Marengo I	W185	Wind	Not Eligible	Not Eligible	1-Aug-07
Marengo II	W772	Wind	Not Eligible	Not Eligible	28-Jun-08
Bennett Creek Windfarm - REC Only	W542	Wind	Not Eligible	Not Eligible	30-Sep-08
Hot Springs Windfarm - REC Only	W543	Wind	Not Eligible	Not Eligible	30-Sep-08
*Tuana Springs - REC Only	W1503	Wind	Not Eligible	Not Eligible	14-May-10
Wanapum (Upgrade)	NA	Water (Incremental Hydro)	Not Eligible	Not Eligible	1-Jul-63
Prospect 2 (Upgrade 1999)	W180	Water (Incremental Hydro)	Not Eligible	Not Eligible	1-Oct-58
Lemolo 1 (Upgrade 2003)	W157	Water (Incremental Hydro)	Not Eligible	Not Eligible	1-Jul-55
JC Boyle (Upgrade 2005)	W140	Water (Incremental Hydro)	Not Eligible	Not Eligible	1-Jan-28
Lemolo 2 (Upgrade 2009)	W158	Water (Incremental Hydro)	Not Eligible	Not Eligible	1-Nov-56
Priest Rapids	NA	Water (Incremental Hydro)	Not Eligible	Not Eligible	1-Oct-59
Top of the World	W1749	Wind	Not Eligible	Not Eligible	1-Oct-10
Facility 16			---	---	
Facility 17			---	---	
Facility 18			---	---	
Facility 19			---	---	
Facility 20			---	---	
Facility 21			---	---	
Facility 22			---	---	
Facility 23			---	---	
Facility 24			---	---	
Facility 25			---	---	
Facility 26			---	---	
Facility 27			---	---	
Facility 28			---	---	
Facility 29			---	---	
Facility 30			---	---	

*Note: Due to a Nov. 2014 generation shortfall, Tuana Springs delivered eligible substitute RECs from Power County Wind Park South (WREGIS ID W2533)

In both the "Compliance Summary" and "Facility Detail" worksheets, utilities may need to protect commercially sensitive information by use of the CONFIDENTIAL designation.

Facility Name:

Goodnoe Hills

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Goodnoe Hills	239,431	221,156	227,258	216,762		
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%		
Eligible MWh Available for RCW 19.285 Compliance	18,896	17,609	17,896	17,392		

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012	18,896	18,896				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013		17,609	17,609			
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014			17,896	17,896		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015				17,392	17,392	
2015 Surplus Applied to 2014						
2015 Surplus Applied to 2016						
Net Surplus Adjustments	(18,896)	1,287	(287)	504		

Adjustment for Events Beyond Control

	2011	2012	2013	2014	2015	2016

Contribution to RCW 19.285 Compliance

	2011	2012	2013	2014	2015	2016
	-	18,896	17,609	17,896	17,392	

Facility Name:

Leaning Juniper

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Leaning Juniper	234,789	190,905	206,164	215,245		
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%		
Eligible MWh Available for RCW 19.285 Compliance	18,530	15,200	16,235	17,270		

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012	18,530	18,530				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013		15,200	15,200			
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014			16,235	16,235		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015				17,270	17,270	
2015 Surplus Applied to 2014						
2015 Surplus Applied to 2016						
Net Surplus Adjustments	(18,530)	3,330	(1,035)	(1,035)		

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	(0)	18,530	15,200	16,235	17,270	
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Facility Name:

Marengo I

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Marengo I	403,408	358,669	331,240	367,390		
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%		
Eligible MWh Available for RCW 19.285 Compliance	31,837	28,557	26,084	29,478		

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012	31,837	31,837				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013		28,557	28,557			
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014			26,084	26,084		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015				29,478	29,478	
2015 Surplus Applied to 2014						
2015 Surplus Applied to 2016						
Net Surplus Adjustments	(31,837)	3,280	2,473	(3,393)		

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	0	31,837	28,557	26,084	29,478	
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Facility Name:

Marengo II

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Marengo II	194,378	177,552	154,612	174,766		
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%		
Eligible MWh Available for RCW 19.285 Compliance	15,341	14,137	12,175	14,022		

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012	15,341	15,341				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013		14,137	14,137			
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014			12,175	12,175		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015				14,022	14,022	
2015 Surplus Applied to 2014						
2015 Surplus Applied to 2016						
Net Surplus Adjustments	(15,341)	1,204	1,961	(1,847)		

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	(0)	15,341	14,137	12,175	14,022	
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Facility Name:

Bennett Creek Windfarm - REC Only

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Bennett Creek W	12,259					
Percent of MWh Qualifying Under RCW 19.285	100%					
Percent of Qualifying MWh Allocated to WA	100%					
Eligible MWh Available for RCW 19.285 Compliance	12,259	-	-	-	-	-

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012	12,259	12,259				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013		-	-			
2013 Surplus Applied to 2012			-			
2013 Surplus Applied to 2014				-		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015					-	
2015 Surplus Applied to 2014						
2015 Surplus Applied to 2016						
Net Surplus Adjustments	(12,259)	12,259	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	12,259	-	-	-	-
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Facility Name:

Hot Springs Windfarm - REC Only

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Hot Springs Windfarm	7,963					
Percent of MWh Qualifying Under RCW 19.285	100%					
Percent of Qualifying MWh Allocated to WA	100%					
Eligible MWh Available for RCW 19.285 Compliance	7,963	-	-	-	-	-

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012	7,963	7,963				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013		-	-			
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014			-	-		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015				-	-	
2015 Surplus Applied to 2014				-		
2015 Surplus Applied to 2016					-	-
Net Surplus Adjustments	(7,963)	7,963	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	7,963	-	-	-	-
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Facility Name:

***Tuana Springs - REC Only**

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from *Tuana Springs - REC Only		29,430	32,556	35,021		
Percent of MWh Qualifying Under RCW 19.285		100%	100%	100%		
Percent of Qualifying MWh Allocated to WA		100%	100%	100%		
Eligible MWh Available for RCW 19.285 Compliance	-	29,430	32,556	35,021	-	-

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012		-				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013		17,177	17,177			
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014			6,731	6,731		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015				-	-	
2015 Surplus Applied to 2014				-		
2015 Surplus Applied to 2016					-	-
Net Surplus Adjustments	-	(17,177)	10,446	6,731	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	12,253	43,002	41,752	-	-
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Facility Name:

Wanapum (Upgrade)

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Wanapum (Upgrade)		8,509	8,015	6,194		
Percent of MWh Qualifying Under RCW 19.285		100%	100%	0%	0%	
Percent of Qualifying MWh Allocated to WA		8%	8%	8%		
Eligible MWh Available for RCW 19.285 Compliance	-	678	631	-	-	-

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012		-				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013						
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014				-		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015					-	
2015 Surplus Applied to 2014						-
2015 Surplus Applied to 2016						-
Net Surplus Adjustments	-	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	678	631	-	-	-
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Facility Name:

Prospect 2 (Upgrade 1999)

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Prospect 2 (Upgrade 1999)		4,118	3,722	3,469		
Percent of MWh Qualifying Under RCW 19.285		100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA		8%	8%	8%		
Eligible MWh Available for RCW 19.285 Compliance	-	328	293	278		-

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012		-				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013						
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014				-		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015					-	
2015 Surplus Applied to 2014						-
2015 Surplus Applied to 2016						-
Net Surplus Adjustments	-	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	328	293	278		-
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Facility Name:

Lemolo 1 (Upgrade 2003)

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Lemolo 1 (Upgrade 2003)		17,021	12,661	14,311		
Percent of MWh Qualifying Under RCW 19.285		100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA		8%	8%	8%		
Eligible MWh Available for RCW 19.285 Compliance	-	1,355	997	1,148		-

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012		-				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013			-			
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014				-		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015					-	
2015 Surplus Applied to 2014				-		
2015 Surplus Applied to 2016						-
Net Surplus Adjustments	-	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	1,355	997	1,148		-
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Facility Name:

JC Boyle (Upgrade 2005)

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from JC Boyle (Upgrade 2005)		3,462	2,402	2,295		
Percent of MWh Qualifying Under RCW 19.285		100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA		8%	8%	8%		
Eligible MWh Available for RCW 19.285 Compliance	-	276	189	184		-

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012		-				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013			-			
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014				-		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015					-	
2015 Surplus Applied to 2014				-		
2015 Surplus Applied to 2016						-
Net Surplus Adjustments	-	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	276	189	184		-
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Facility Name:

Lemolo 2 (Upgrade 2009)

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Lemolo 2 (Upgrade 2009)		1,781	1,290	1,355		
Percent of MWh Qualifying Under RCW 19.285		100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA		8%	8%	8%		
Eligible MWh Available for RCW 19.285 Compliance	-	142	102	109		-

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012		-				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013			-			
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014				-		
2014 Surplus Applied to 2013					-	
2014 Surplus Applied to 2015						-
2015 Surplus Applied to 2014						-
2015 Surplus Applied to 2016						-
Net Surplus Adjustments	-	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	142	102	109		-
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Facility Name:

Priest Rapids (Upgrade)

MWh Allocated to WA Compliance

	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased from Priest Rapids (Upgrade)				6,981		
Percent of MWh Qualifying Under RCW 19.285				0%	0%	
Percent of Qualifying MWh Allocated to WA						
Eligible MWh Available for RCW 19.285 Compliance	-	-	-	-	-	-

Non REC Eligible Generation

	2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-

REC Sales / Transfers

	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold						
Bonus Incentives Transferred						
Bonus Incentives Not Realized						
Total Sold / Transferred / Unrealized	-	-	-	-	-	-

Adjustments

	2011	2012	2013	2014	2015	2016
2011 Surplus Applied to 2012		-				
2012 Surplus Applied to 2011	-					
2012 Surplus Applied to 2013		-				
2013 Surplus Applied to 2012		-				
2013 Surplus Applied to 2014			-	-		
2014 Surplus Applied to 2013			-			
2014 Surplus Applied to 2015					-	-
2015 Surplus Applied to 2014					-	
2015 Surplus Applied to 2016						-
Net Surplus Adjustments	-	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	-	-	-
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Compliance Contribution by Generation Type

	2011	2012	2013	2014	2015
Wind	(0)	117,079	118,505	120,299	-
Solar	-	-	-	-	-
Water (Incremental Hydro)	-	2,778	2,212	1,719	-
Biomass	-	-	-	-	-
Geothermal	-	-	-	-	-
Landfill Gas	-	-	-	-	-
Sewage Treatment Gas	-	-	-	-	-
Wave, Ocean, Tidal	-	-	-	-	-
Biodiesel Fuel	-	-	-	-	-

**PacifiCorp
Annual Report Requirements
RCW 19.285.070
Washington Renewable Report
June 1, 2015**

Attachment B

**Description of Methodology
for Calculating Incremental Hydro
for Company-Owned Hydro Electric Projects
and Updated Incremental Hydro Percentages**

Attachment B

Description of Hydroelectric Efficiency Analysis

The incremental hydro generation resulting from efficiency gains from hydropower upgrades were calculated using the same method that PacifiCorp submitted to the Oregon Department of Energy for certification of PacifiCorp's facilities as eligible for the Oregon Renewable Portfolio Standard program.

Historical hourly generation data for the period 2007 through 2012 was collected for each unit that was upgraded. Each hour of generation was modified to create two additional hourly profiles representing the efficiency of the unit before and after the upgrade. The hourly pre- and post- efficiency values were based on curves developed from the unit index tests or manufacturer-provided theoretical curves. Efficiency gain for each hour was calculated by taking the difference between the new and old efficiency value and dividing it by the old efficiency value. This gain was then multiplied by the post upgrade generation value to produce an incremental megawatt-hour gain. The initial calculated incremental gain was subtracted from the pre/post upgraded generation profiles to exclude the generation associated with the upgrade.

Generation improvements were calculated for every instance when efficiency improvements were positive including those periods when the unit was ramping up to maximum efficiency. In some cases, portions of the post efficiency upgrade curve are less than the pre upgrade curve. In instances that the efficiency gain was negative, generation was not included in the calculation. Further, since in some cases the post upgrade curve extended beyond the pre upgrade curve (i.e. the new turbine had a higher generation capacity) generation improvements were capped at the point when flows on the pre and post upgrade curve were equal.



Oregon

John A. Kitzhaber, MD, Governor

Department of Energy

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April 4, 2014

Teri Ikeda
PacifiCorp
825 NE Multnomah St.
Portland, OR 97232



RE: Updated Certification for Efficiency Upgrades at Eleven Hydropower Generating Units

Dear Ms. Ikeda:

The Oregon Department of Energy has approved Pacific Power's request for an updated incremental hydropower efficiency percentage for the following eleven generating units. As part of the update, Pacific Power provided the department with hourly generation data for the time period 2007 through 2012.

Generating Unit	WREGIS Number	Approval Number	New Incremental Percentage
Prospect 2	W140	12alt002or	1.68%
Yale 1 & 2	W141	12alt003wa	1.35%
Copco 1	W142	12alt004ca	0.52%
Cutler	W151	12alt005ut	3.10%
Lemolo 1	W157	12alt006or	10.16%
Lemolo 2	W158	12alt007or	0.78%
Oneida	W160	12alt008id	7.87%
Pioneer	W162	12alt009ut	6.74%
Prospect 3	W164	12alt010or	10.71%
Big Fork	W179	12alt011mt	4.22%
JC Boyle	W180	12alt012or	1.33%

The Department notified WREGIS of this change on April 4, 2014 and generation sourced from the following units will continue to be marked as "alternate use" fuel in WREGIS. If any changes are made to these facility that could affect their eligibility for the Oregon RPS, the Department must be notified.

Please contact me with any questions about this letter or approval.

Best,

Julie Peacock
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