

May 1, 2017

***VIA ELECTRONIC FILING***

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: Docket UE-100749—Annual Report of Proceeds from the Sale of Renewable Energy Credits**

In compliance with the Washington Utilities and Transportation Commission's orders in Docket UE-100749, Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits for filing its annual report of proceeds from the sale of Renewable Energy Credits (RECs).<sup>1</sup> The Commission's orders require that this report include:

- Actual REC sales proceeds attributable to Washington that Pacific Power received during the prior calendar year;
- The total amount of Schedule 95 credits the Company provided to its customers during that calendar year;
- A forecast of the REC sales proceeds attributable to Washington that Pacific Power reasonably anticipates receiving during the upcoming calendar year; and
- Any proposed revision to the credit rate in Schedule 95 to be in effect during the upcoming calendar year.<sup>2</sup>

The Washington renewable portfolio standard (RPS) compliance requirement increased to nine percent of average Washington retail load in 2016. At this level, the Company's Washington-allocated share of RECs is insufficient to meet the compliance requirement.<sup>3</sup> Because Washington's entire allocated share of 2016 RECs will be used to satisfy the Company's Washington RPS requirement, there are no REC revenues attributable to Washington customers for 2016.<sup>4</sup> Similarly, the Company does not anticipate REC revenues attributable to Washington customers for calendar year 2017, as Washington's share of RECs will be used to meet the ongoing RPS requirement. Confidential Attachment A provides a summary, in a format

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<sup>1</sup> Order 16 at 31: "Pacific Power and Light Company must continue to make the compliance report and true-up filings required in Order 13 by May 1 of each year until relieved of this obligation."

<sup>2</sup> Order 13 at 3.

<sup>3</sup> PacifiCorp addresses the variance between Washington's System Generation (SG) share of west control area resources (approximately 8 percent) and Washington's Control Area Generation West (CAGW) share (approximately 23 percent) by providing Washington RECs from other Washington-eligible resources. Actual RECs used to fulfill Washington's CAGW share may include RECs from resources located in any of PacifiCorp's jurisdictions or include unbundled REC purchases, but the total will equal Washington's CAGW share of west control area resources.

<sup>4</sup> RCW 19.285.040(2)(e) states that the requirements of the Energy conservation and renewable energy targets "may be met for any given year with renewable energy credits produced during that year, the preceding year, or the subsequent year[.]"

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consistent with the Company's previous reports, demonstrating that Washington's allocated share of RECs is being used to satisfy Washington's RPS requirement. It also demonstrates that there are no REC revenues attributable to Washington for non-RPS eligible resources for calendar year 2016, or projected revenues for calendar year 2017. Due to these circumstances, a revision to Schedule 95 rates is unnecessary at this time.<sup>5</sup>

Confidential Attachment A is provided subject to the terms and conditions of Order 03 in Docket UE-100749. The Company is also enclosing a redacted version with this filing.

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

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

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

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

Sincerely,

                  /s/                    
R. Bryce Dalley  
Vice President, Regulation  
Pacific Power & Light Company  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
(503) 813-6389  
bryce.dalley@pacificorp.com

Enclosures

cc: UE-100749 Service List

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<sup>5</sup> On September 9, 2016, Pacific Power filed a petition seeking authorization to defer costs related to the purchase of unbundled RECs for RPS compliance. In Order 01 in Docket UE-161067, the Commission allowed Pacific Power to recover the cost of those RECs through Schedule 95. Pacific Power submitted a compliance filing on April 14, 2017, with an effective date of May 8, 2017.

**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.

<p><b>Industrial Customers of Northwest Utilities</b> Melinda Davison <a href="mailto:mjd@dvclaw.com">mjd@dvclaw.com</a> Jesse Cowell <a href="mailto:jec@dvclaw.com">jec@dvclaw.com</a> Tyler Pepple <a href="mailto:tcp@dvclaw.com">tcp@dvclaw.com</a> Bradley G. Mullins <a href="mailto:brmullins@mwanalytics.com">brmullins@mwanalytics.com</a> Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204</p>	<p><b>Washington Utilities &amp; Trans. Comm'n</b> Tom Schooley <a href="mailto:tschoole@utc.wa.gov">tschoole@utc.wa.gov</a> Sally Brown <a href="mailto:sbrown@utc.wa.gov">sbrown@utc.wa.gov</a> Christopher M. Casey <a href="mailto:ccasey@utc.wa.gov">ccasey@utc.wa.gov</a> Patrick Oshie <a href="mailto:poshie@utc.wa.gov">poshie@utc.wa.gov</a> 1400 S. Evergreen Park Drive S.W. PO Box 40128 Olympia WA 98504</p>
<p><b>The Energy Project</b> Brad Purdy Attorney at Law 2019 N. 17<sup>th</sup> Street Boise, ID 83702 <a href="mailto:bmpurdy@hotmail.com">bmpurdy@hotmail.com</a>  Charles Eberdt 3406 Redwood Ave. Bellingham, WA 98225 <a href="mailto:chuck_eberdt@oppco.org">chuck_eberdt@oppco.org</a></p>	<p><b>PacifiCorp</b> Katherine McDowell <a href="mailto:katherine@mcd-law.com">katherine@mcd-law.com</a> 419 SW 11<sup>th</sup> Ave, Suite 400 Portland, OR 97205  R. Bryce Dalley <a href="mailto:Bryce.dalley@pacificorp.com">Bryce.dalley@pacificorp.com</a> Vice President, Regulation Washington Dockets <a href="mailto:WashingtonDockets@PacifiCorp.com">WashingtonDockets@PacifiCorp.com</a> 825 NE Multnomah St. Suite 2000 Portland, OR 97232</p>
<p><b>Office of the Attorney General</b> Simon ffitch <a href="mailto:Simonf@atg.wa.gov">Simonf@atg.wa.gov</a> Sarah Shifley <a href="mailto:Sarah.Shifley@atg.wa.gov">Sarah.Shifley@atg.wa.gov</a> 800 Fifth Avenue Seattle, WA 98104-3188</p>	<p><b>Wal-Mart</b> Arthur A. Butler Ater Wynne LLP 601 Union Street, Suite 1501 Seattle, WA 98101 <a href="mailto:aab@aterwynne.com">aab@aterwynne.com</a></p>

DATED this 1<sup>st</sup> day of May 2017.



Katie Savarin  
Coordinator, Regulatory Operations

**REDACTED**

**CONFIDENTIAL ATTACHMENT A**

ATTACHMENT A IS DESIGNATED CONFIDENTIAL PER THE  
PROTECTIVE ORDER IN THIS DOCKET, ORDER 03

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

(A) (B) (C)

Line	Description	Actual 2016 <sup>1</sup>	Forecast 2017 <sup>2</sup>	Reference
1	Washington Allocation of Revenue (WCA Resources)	\$ -	\$ -	CONF Attach A, Line 15
2	Washington Allocation of Imputed Revenue for MWhs Held for Compliance (WCA Resources)	\$ -	\$ -	CONF Attach A, Line 50
3	Adjustment for Washington RPS Compliance Requirement	\$ -	\$ -	CONF Attach A, Line 55
4	Accumulated Interest through April 2017	\$ -	\$ -	Attach A Page 5
<b>5</b>	<b>Total Washington-Allocated Revenue</b>	<b>\$ -</b>	<b>\$ -</b>	

1. 2016 amounts do not include the costs of purchasing unbundled RECs for compliance purposes.

2. The Company anticipates that Washington-allocated RECs from 2015 forward will be used for compliance and not available for sale. Accordingly, no Washington-allocated REC revenue is available for calendar years 2016 and 2017.

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

Line	Description	Jan 2016	Feb 2016	Mar 2016	Apr 2016	May 2016	Jun 2016	Jul 2016	Aug 2016	Sep 2016	Oct 2016	Nov 2016	Dec 2016
1	<b>Total Company Booked Revenues (WCA Resources)</b>												
2	WCA Wind												
3	WCA Small Hydro												
4	WCA Large Hydro												
5	WCA Biomass												
6	<b>Total Booked Revenues (WCA Resources)</b>												
7	Washington % (CAGW)	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%
8	<b>WA Allocated Booked Revenues (WCA Resources)</b>												
9	WCA Wind												
10	WCA Small Hydro												
11	WCA Large Hydro												
12	WCA Biomass												
13	<b>Total WA Allocated Booked Revenues (WCA Resources)</b>												
14	Washington % (CAGW)	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%
15	<b>Imputed Revenue Calculations (Used for RPS Compliance)</b>												
16	Washington % (CAGW)												
17	Washington Allocation												
18	Assumed Percentage Sold												
19	Washington Allocation Considered Sold												
20	Average Price												
21	<b>WA Allocated Imputed Revenues (WCA Wind)</b>												
22	Held for Compliance (WCA Small Hydro)												
23	Washington % (CAGW)	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%
24	Assumed Percentage Sold	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
25	Washington Allocation Considered Sold												
26	Average Price												
27	<b>WA Allocated Imputed Revenues (WCA Small Hydro)</b>												
28	Held for Compliance (WCA Large Hydro)												
29	Washington % (CAGW)	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%
30	Assumed Percentage Sold	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
31	Washington Allocation Considered Sold												
32	Average Price												
33	<b>WA Allocated Imputed Revenues (WCA Large Hydro)</b>												
34	Held for Compliance (WCA Biomass)												
35	Washington % (CAGW)	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%
36	Assumed Percentage Sold	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
37	Washington Allocation Considered Sold												
38	Average Price												
39	<b>WA Allocated Imputed Revenues (WCA Large Hydro)</b>												
40	Held for Compliance (WCA Biomass)												
41	Washington % (CAGW)	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%	22.7419%
42	Assumed Percentage Sold	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
43	Washington Allocation Considered Sold												
44	Average Price												
45	<b>Total WA Allocated Imputed REC Revenues</b>												
46	Washington RPS Compliance Requirement												
47	Washington RPS Compliance Requirement (WCA Wind)												
48	Average Price												
49	<b>Adjustment for Washington RPS Compliance Requirement</b>												
50	Washington RPS Compliance Requirement (WCA Wind)												
51	Average Price												
52	<b>Subtract Revenue for Washington RPS Compliance (WCA Wind)</b>												
53	Total Washington Allocated Revenue												
54													
55													
56													
57													

NOT APPLICABLE - Washington is allocated RPS-eligible RECs equivalent to its CAGW share (approximately 23%) of WCA wind resources for use towards the RPS. All Washington-allocated RECs will be utilized to meet annual RPS compliance requirements or banked to meet RPS targets in the following year.

NOT APPLICABLE - Washington is allocated RPS-eligible RECs equivalent to its CAGW share (approximately 23%) of WCA wind resources for use towards the RPS. All Washington-allocated RECs will be utilized to meet annual RPS compliance requirements or banked to meet RPS targets in the following year.

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NOT APPLICABLE - All Washington-allocated REC applied against Washington's RPS Compliance requirement.

Line	Description	Jan 2017	Feb 2017	Mar 2017	Apr 2017	May 2017	Jun 2017	Jul 2017	Aug 2017	Sep 2017	Oct 2017	Nov 2017	Dec 2017
1	<b>Total Company Booked Revenues (WCA Resources)</b>												
2	WCA Wind												
3	WCA Small Hydro												
4	WCA Large Hydro												
5	WCA Biomass												
6	<b>Total Booked Revenues (WCA Resources)</b>												
7	Washington % (CAGW)	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%
8													
9													
10	<b>WA Allocated Booked Revenues (WCA Resources)</b>												
11	WCA Wind												
12	WCA Small Hydro												
13	WCA Large Hydro												
14	WCA Biomass												
15	<b>Total WA Allocated Booked Revenues (WCA Resources)</b>												
16													
17	<b>Imputed Revenue Calculations (Used for RPS Compliance)</b>												
18	Held for Compliance (WCA Wind)												
19	Washington % (CAGW)												
20	Washington Allocation												
21	Assumed Percentage Sold												
22	Washington Allocation Considered Sold												
23	Average Price												
24													
25	<b>WA Allocated Imputed Revenues (WCA Wind)</b>												
26	Held for Compliance (WCA Small Hydro)												
27	Washington % (CAGW)	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%
28	Washington Allocation												
29	Assumed Percentage Sold												
30	Washington Allocation Considered Sold												
31	Average Price												
32	<b>WA Allocated Imputed Revenues (WCA Small Hydro)</b>												
33	Held for Compliance in (WCA Large Hydro)												
34	Washington % (CAGW)	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%
35	Washington Allocation												
36	Assumed Percentage Sold												
37	Washington Allocation Considered Sold												
38	Average Price												
39													
40	<b>WA Allocated Imputed Revenues (WCA Large Hydro)</b>												
41	Held for Compliance in (WCA Biomass)												
42	Washington % (CAGW)	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%	22.4735%
43	Washington Allocation												
44	Assumed Percentage Sold												
45	Washington Allocation Considered Sold												
46	Average Price												
47													
48	<b>WA Allocated Imputed Revenues (WCA Biomass)</b>												
49													
50	<b>Total WA Allocated Imputed REC Revenues</b>												
51													
52	<b>Adjustment for Washington RPS Compliance Requirement</b>												
53	Washington RPS Compliance Requirement (WCA Wind)												
54	Average Price												
55	<b>Subtract Revenue for Washington RPS Compliance (WCA Wind)</b>												
56	<b>Total Washington Allocated Revenue</b>												

NOT APPLICABLE - Washington is allocated RPS-eligible RECs equivalent to its CAGW share (approximately 23%) of WCA wind resources for use towards the RPS. All Washington-allocated RECs will be utilized to meet annual RPS compliance requirements or banked to meet RPS targets in the following year.

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NOT APPLICABLE - Washington is allocated RPS-eligible RECs equivalent to its CAGW share (approximately 23%) of WCA wind resources for use towards the RPS. All Washington-allocated RECs will be utilized to meet annual RPS compliance requirements or banked to meet RPS targets in the following year.

NOT APPLICABLE - All Washington-allocated REC applied against Washington's RPS Compliance requirement.

		Actual	Forecast
West Control Area RPS Eligible Wind Generation (MWh)		2016	2017
1	LEANING JUNIPER I		
2	GOODNOE HILLS		
3	MARENGO		
4	MARENGO II		
5	<b>Total Generation (MWh)</b>		
6	Washington % (CAGW)		
7	Washington's Allocated Share (MWh)		
8	Held for Compliance (MWh)		
9	Available for Sale (MWh)		
10	<b>Total Revenues from Sales</b>		
11	<b>Average Price</b>		
12	<b>% of Available for Sale Actually Sold</b>		

		2016	2017
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	<b>Total Generation (MWh)</b>		
32	Held for Compliance (MWh)		
33	Available for Sale (MWh)		
34	Actual Sales (MWh)		
35	Retained (MWh)		
36	<b>Total Revenues from Sales</b>		
37	<b>Average Price</b>		
38	<b>% of Available for Sale Actually Sold</b>		

		2016	2017
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	<b>Total Generation (MWh)</b>		
48	Held for Compliance (MWh)		
49	Available for Sale (MWh)		
50	Actual Sales (MWh)		
51	Retained (MWh)		
52	<b>Total Revenues from Sales</b>		
53	<b>Average Price</b>		
54	<b>% of Available for Sale Actually Sold</b>		

		2016	2017
West Control Area RPS Eligible Biomass Generation (MWh)			
55	ROSEBURG FOREST PRODUCTS		
56	<b>Total Generation (MWh)</b>		
57	Held for Compliance (MWh)		
58	Available for Sale (MWh)		
59	Actual Sales (MWh)		
60	Retained (MWh)		
61	<b>Total Revenues from Sales</b>		
62	<b>Average Price</b>		
63	<b>% of Available for Sale Actually Sold</b>		

Washington Retail Sales		MWh
64	Calendar Year 2013 (Actual)	3,971,579
65	Calendar Year 2014 (Actual)	4,117,646
66	Calendar Year 2015 (Actual)	4,108,270
67	Calendar Year 2016 (Actual)	3,981,654
68	Calendar Year 2017 (Forecast)	

Washington RPS Compliance Requirements		MWh	Reference
69	1/1/16 - 9% (2016 Generation Eligible for Compliance)	370,166	9% of Average 2014 and 2015 Retail Sales
70	1/1/17 - 9% (2017 Generation Eligible for Compliance)	364,047	9% of Average 2015 and 2016 Retail Sales



Schedule 95 (Actuals 2015, 2016 & Projected 2017)

<b>Approved Balance for Amortization:</b>		<b>Accumulated REC Deferral Balance:</b>	
<b>April 2011 - December 2013</b>	<b>(4,916,393)</b>	<b>Actual 2014</b>	<b>\$ 6,035</b>
		<b>Actual 2015</b>	<b>-</b>
		<b>Actual 2016</b>	<b>-</b>
		<b>Forecast 2017</b>	<b>-</b>
<u><b>Year/Month</b></u> <sup>1</sup>		<u><b>Year/Month</b></u>	
Jan-15		Jan-15	-
Feb-15		Feb-15	-
Mar-15 <sup>2</sup>	(227)	Mar-15	-
Apr-15	(77,766)	Apr-15	-
May-15	(176,252)	May-15	-
Jun-15	(193,462)	Jun-15	-
Jul-15	(241,573)	Jul-15	-
Aug-15	(219,234)	Aug-15	-
Sep-15	(218,328)	Sep-15	-
Oct-15	(186,857)	Oct-15	-
Nov-15	(191,724)	Nov-15	-
Dec-15	(241,093)	Dec-15	-
Jan-16 <sup>3</sup>	(255,521)	Jan-16	-
Feb-16	(212,915)	Feb-16	-
Mar-16	(186,944)	Mar-16	-
Apr-16	(166,607)	Apr-16	-
May-16	(172,885)	May-16	-
Jun-16	(185,868)	Jun-16	-
Jul-16	(189,326)	Jul-16	-
Aug-16	(220,025)	Aug-16	-
Sep-16	(204,975)	Sep-16	-
Oct-16	(329,418)	Oct-16	-
Nov-16	(189,890)	Nov-16	-
Dec-16	(235,890)	Dec-16	-
Jan-17	(291,400)	Jan-17	-
Feb-17	(254,241)	Feb-17	-
Mar-17	(73,973)	Mar-17	-
Apr-17	-	Apr-17	-
May-17	-	May-17	-
Jun-17	-	Jun-17	-
Jul-17	-	Jul-17	-
Aug-17	-	Aug-17	-
Sep-17	-	Sep-17	-
Oct-17	-	Oct-17	-
Nov-17	-	Nov-17	-
Dec-17	-	Dec-17	-
<b>2015 Actual Amortization</b>	<b>(1,746,516)</b>	<b>2015 Actual Amortization</b>	<b>-</b>
<b>2016 Actual Amortization</b>	<b>(2,550,263)</b>	<b>2016 Actual Amortization</b>	<b>-</b>
<b>2017 Projected Amortization</b>	<b>(619,614)</b>	<b>2017 Projected Amortization</b>	<b>-</b>

<sup>1</sup>Per Order 13 in Docket UE 100749 issued February 12, 2013, Schedule 95 was set to zero cents per kilowatt hour

<sup>2</sup>Per Order 16 in Docket UE 100749 issued December 12, 2014, Schedule 95 amortization effective March 31, 2015

<sup>3</sup>2017 projected amortization amounts reflect first three months actual balances, with balance of year forecasts