

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of	DOCKET UE-131063
PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY'S	ORDER 01
Renewable Energy Target Progress Report under RCW 19.285.070 and WAC 480-109-040	ORDER APPROVING COMPLIANCE WITH ELIGIBLE RENEWABLE ENERGY TARGET REPORTING REQUIREMENTS FOR 2013

BACKGROUND

1 The Energy Independence Act (EIA or Act)¹ requires qualifying electric utilities to obtain certain percentages of their electricity from eligible renewable resources. The Washington Utilities and Transportation Commission (Commission) enforces compliance with the EIA by investor-owned utilities.² Commission rules implementing the Act require that “[b]y January 1 of each year beginning in 2012 and continuing through 2015, each [qualifying investor-owned] utility must use sufficient eligible renewable resources, acquire equivalent renewable energy credits (RECs), or a combination of both, to supply at least three percent of its load for the remainder of each year.”³ The Act requires a utility to file a report demonstrating that it met that obligation⁴ and describing “the steps [it] is taking to meet the renewable resource requirements for the current year.”⁵ Ultimately, the Commission must determine “whether the utility complied with its . . . renewable resource targets.”⁶

¹ RCW Chapter 19.285.

² RCW 19.285.060(6).

³ WAC 480-109-020(1)(a). For a detailed discussion of the Commission’s implementation of the EIA and the meaning of the terms used in the statute, see *In re PacifiCorp Renewable Energy Target Progress Report under RCW 19.285.070 and WAC 480-109-040*, Docket UE-120813, Order 01, Order Regarding 2012 Renewable Energy Target (Sept. 13, 2012).

⁴ RCW 19.285.070; WAC 480-109-040.

⁵ WAC 480-109-040(1)(d).

⁶ WAC 480-109-040(2)(c).

- 2 The Commission has implemented these requirements by establishing a two-step compliance process.⁷ Because a utility may comply with its renewable portfolio standards (RPS) obligation by using RECs acquired in the year after the target year, ultimate compliance for 2012, for example, may be demonstrated as late as June 1, 2014. Accordingly, there will be two commission decisions for each year's compliance: (1) a determination that the company has enough resources to meet the 3 percent target; and (2) the retrospective compliance decision. Before the Commission is the initial resource-adequacy filing made by PacifiCorp d/b/a Pacific Power and Light Company (PacifiCorp or Company) for its 2013 obligation. The Commission will consider PacifiCorp's compliance with its 2013 target when the Company requests such a finding, which PacifiCorp must do no later than June 1, 2015.⁸
- 3 On May 31, 2013, PacifiCorp filed a report under RCW 19.285.070 and WAC 480-109-040 ("RPS Report"). The Company seeks an order from the Commission confirming that PacifiCorp has complied with the Commission's EIA reporting requirements and accepting the Company's calculations and eligibility of the renewable resources identified in the RPS Report for 2013.
- 4 On June 7, 2013, the Commission issued a Notice inviting interested persons to file written comments on PacifiCorp's RPS Report. During the comment period, the Commission received written comments from Commission Staff and joint written comments from Renewable Northwest Project and NW Energy Coalition (RNP/NWEC). At the July 26, 2013, Open Meeting, the Commission heard oral comments from Commission Staff, PacifiCorp, and RNP/NWEC. The Commission also considered Staff's Open Meeting memorandum of that date. At that Open Meeting, the Commission accepted Staff's recommendation.⁹ The Commission indicated that a formal order would follow. This is that order.

⁷ *In re PacifiCorp Renewable Energy Target Progress Report under RCW 19.285.070 and WAC 480-109-040*, Docket UE-120813, Order 01, Order Regarding 2012 Renewable Energy Target ¶38 (Sept. 13, 2012).

⁸ To keep these various filings and decisions organized, the Commission will include all filings for a utility's compliance for a given year under one docket number. Accordingly, PacifiCorp's compliance with the 2013 target should be made under this docket. Compliance with the 2012 target will be considered under Docket UE-120813.

⁹ Staff's July 26, 2013, Open Meeting memorandum recommended that the Commission issue an order in this docket finding: (1) The 2013 renewable energy target for PacifiCorp is 120,716 megawatt-hours; (2) PacifiCorp has complied with the June 1, 2013, reporting requirements; (3) PacifiCorp has demonstrated that, by January 1, 2013, the Company acquired at least 120,716 megawatt-hours of eligible renewable resources for its use in 2013; and (4) PacifiCorp must file a

DISCUSSION

A. PacifiCorp’s RPS Report

5 PacifiCorp’s RPS Report included all items required by WAC 480-109-040 and RCW 19.285.070(1). Based on its average annual load for 2011 and 2012, PacifiCorp calculated that its 2013 renewable energy target is 120,716 megawatt-hours. PacifiCorp also reported that it had acquired or contracted for 120,717 megawatt-hours of renewable energy or equivalent renewable energy credits to meet its 2013 target as detailed in the following table:

Facility Name (Location)	Resource Type and Vintage	Amount (MWh)	Facility On-Line Date	Ownership/ Contract
Goodnoe Hills (Goldendale, WA)	Wind, 2012	17,609 RECs	05/31/2008	PacifiCorp- owned
Leaning Juniper (Arlington, OR)	Wind, 2012	15,200 RECs	09/14/2006	PacifiCorp- owned
Marengo I (Dayton, WA)	Wind, 2012	28,557 RECs	08/01/2007	PacifiCorp- owned
Marengo II (Dayton, WA)	Wind, 2012	14,137 RECs	06/28/2008	PacifiCorp- owned
Tuana Springs (Twin Falls Cnty, ID)	Wind, 2012	17,177 RECs	05/14/2010	Contract
Tuana Springs (Twin Falls Cnty, ID)	Wind, 2013	25,803* RECs	05/14/2010	Contract
Wolverine Creek (Idaho Falls, ID)	Wind, 2013	- ** RECs	02/12/2006	Contract
Prospect 2 (Rogue River, OR)	Water (Incremental Hydro), 2013	278* MWh	Upgrade 1999	PacifiCorp- owned
Lemolo 1 (N. Umpqua R., OR)	Water (Incremental Hydro), 2013	1,087* MWh	Upgrade 2003	PacifiCorp- owned
Lemolo 2 (N. Umpqua R., OR)	Water (Incremental Hydro), 2013	100* MWh	Upgrade 2009	PacifiCorp- owned
J.C. Boyle (Klamath R. OR)	Water (Incremental Hydro), 2013	134* MWh	Upgrade 2005	PacifiCorp- owned
Wanapum Fish Bypass (Columbia R., WA)	Water (Incremental Hydro), 2013	635* MWh	Upgrade 2008	Contract w/Grant Cnty PUD

second report no later than June 1, 2015, that provides the information necessary to determine whether the Company met the January 1, 2013, target.

Facility Name (Location)	Resource Type and Vintage	Amount (MWh)	Facility On-Line Date	Ownership/ Contract
Total MWh + RECs Acquired		120,717		
2013 Target (MWh)		120,716		
*RECs or MWh estimated for 2013				
**2013 generation will be applied toward compliance for 2013 if needed				

PacifiCorp reported that all of the RECs it had acquired for 2013 compliance had been produced in 2012 or would be produced in 2013.

- 6 The Company specified two types of eligible renewable energy resources on which it intends to rely to comply with the EIA’s requirements: (1) wind generated power (which comprises 118,483 megawatt-hours or 98.15 percent of the total claimed eligible renewable resources); and (2) incremental electricity produced as a result of hydropower efficiency improvements (representing 2,234 megawatt-hours or 1.85 percent of the total).

B. Relevant Statutory Provisions

- 7 The EIA defines “eligible renewable resource” to mean:

- (a) Electricity from a generation facility powered by a renewable resource other than freshwater that commences operation after March 31, 1999, where: (i) The facility is located in the Pacific Northwest;^[10] or (ii) the electricity from the facility is delivered into Washington state on a real-time basis without shaping, storage, or integration services;
- (b) Incremental electricity produced as a result of efficiency improvements completed after March 31, 1999, to hydroelectric generation projects owned by a qualifying utility and located in the Pacific Northwest or to hydroelectric generation in irrigation pipes and canals located in the Pacific Northwest, where the additional generation in either case does not result in new water diversions or impoundments; and

¹⁰ “Pacific Northwest” is defined in RCW 19.285.030(15) and WAC 480-109-007(15) by reference to the federal Pacific Northwest Electric Power Planning and Conservation Act. Section 3(14) of that act, 16 U.S.C. § 839a(14), defines “Pacific Northwest” to mean Washington, Oregon, Idaho, and Montana west of the Continental Divide, the remainder of the Columbia River basin south of Canada, and contiguous areas served by the Bonneville Power Administration.

(c) Qualified biomass energy.¹¹

The EIA also allows the utility to be considered in compliance with the EIA if “for a given year” “the utility invested four percent of its total annual retail revenue requirement on the incremental costs of eligible renewable resources, the cost of renewable energy credits, or a combination of both”¹² PacifiCorp does not seek to rely on this alternate means of compliance.

C. PacifiCorp’s Eligible Renewable Resources

8 PacifiCorp claims two types of facilities as eligible renewable resources in its Report: (1) wind facilities, and (2) efficiency improvements to its hydropower facilities (also known as “incremental hydropower” facilities). There is no dispute as to the eligibility of the wind facilities. The eligibility of the incremental hydropower identified in the RPS Report, however, requires more detailed inquiry.

1. PacifiCorp’s Inclusion of Incremental Hydropower to Meet Its RPS Obligation

9 The EIA does not specify how to measure or calculate incremental hydropower. The RPS Workgroup convened under Docket UE-110523 agreed on three optional methodologies for calculating incremental hydroelectric efficiency improvements.¹³ Method 1 requires an annual calculation, based on actual water flows or generation during that year. Method 2 also requires an annual calculation, multiplying actual generation by a fixed percentage to determine the generation attributable to efficiency upgrades. Method 2 is similar to the methodology that the Oregon Department of Energy

¹¹ RCW 19.285.030(11). In 2012, the Washington Legislature amended RCW 19.285.030 and other sections of the EIA to alter the extent to which biomass energy qualifies as an eligible renewable resource. Laws of 2012, ch. 22. This Order 01 uses the RCW numbering in effect as of May 31, 2013.

¹² RCW 19.285.050(1)(a). RCW 19.285.050(1)(b) states that the incremental cost of an eligible renewable resource “is calculated 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.”

¹³ In 2011, in Docket UE-110523, Commission Staff convened a Renewable Portfolio Standards Workgroup (RPS Workgroup) to coordinate planning for the filing of utilities’ June 2012 RPS reports. The RPS Workgroup included representatives from utilities, state agencies, and other interested groups. PacifiCorp participated in the RPS Workgroup, which reached some common understandings about the content and format of the June 2012 reports.

adopted under that state's counterpart to the EIA.¹⁴ Method 3 requires a one-time calculation of the increase in annual megawatt-hours attributable to the efficiency upgrades under average historical water flows. PacifiCorp used Method 2 in its RPS Report, identifying two types of eligible incremental hydropower: (1) that generated by four Company-owned facilities in the Pacific Northwest, and (2) that purchased from the Grant County Public Utility District (PUD). Each of those types is described in further detail below.

a. Upgrades at PacifiCorp's Hydroelectric Projects

10 PacifiCorp owns and operates several hydroelectric projects in the western United States, including in Oregon.¹⁵ Over time, PacifiCorp has performed upgrades at some of its hydroelectric facilities, such as rewinding generators and replacing turbine runners, that have increased the generation capacity of the facilities. The Federal Energy Regulatory Commission (FERC) has amended PacifiCorp's licenses to increase the authorized installed generation capacity.¹⁶ FERC has also issued orders certifying incremental hydropower generation for a renewable energy production tax credit under the federal Energy Policy Act of 2005.¹⁷ For purposes of the production tax credit, incremental hydropower generation is calculated under a method similar to Method 3 developed by the RPS Workgroup, but expressed as a percentage of average annual hydropower production rather than as a megawatt-hour amount.¹⁸

¹⁴ See OAR § 330-160-0050.

¹⁵ In the Rogue River watershed, PacifiCorp operates a series of dams and associated structures, including Prospect No. 2 Powerhouse, under a license issued by the Federal Energy Regulatory Commission (FERC) under the Federal Power Act. *PacifiCorp*, 123 FERC ¶ 62,021 (2008); *Pac. Power & Light Co.*, 12 FERC ¶ 62,056 (1980). PacifiCorp operates eight dams, including Lemolo Nos. 1 and 2, in the North Umpqua River watershed, under another license issued by FERC. *PacifiCorp*, 105 FERC ¶ 61,237 (2003). The Company also operates a series of dams in the Klamath River watershed in Oregon and California, including the J.C. Boyle dam in Oregon. PacifiCorp is currently operating the Klamath Hydroelectric Project under an annual FERC license extension. See http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Hydro/Hydro_Licensing/Klamath_River/2013%20KHS_A_Implementation_Report-P8.pdf.

¹⁶ *PacifiCorp.*, 134 FERC ¶ 62,152 (2011) (Lemolo No. 2); *PacifiCorp*, 117 FERC ¶ 62,252 (2006) (J.C. Boyle Unit 2); *PacifiCorp*, 112 FERC ¶ 62,063 (2005) (J.C. Boyle Unit 1); *PacifiCorp*, 111 FERC ¶ 62,319 (2005) (Lemolo No. 1).

¹⁷ *PacifiCorp*, 115 FERC ¶ 61,267 (2006) (J.C. Boyle Unit 2).

¹⁸ 26 U.S.C. § 45(c)(8)(B).

11 PacifiCorp sells electricity in six western states, including Oregon, and the Company is therefore subject to the Oregon RPS law.¹⁹ The Company has developed a method for calculating incremental electricity from hydropower efficiency improvements that it has submitted to the Oregon Department of Energy for the Oregon RPS program. That methodology is similar to Method 2 developed by the RPS Workgroup. PacifiCorp desires to use the same method for calculating incremental hydropower from its own facilities under the Washington EIA.

12 The EIA does not recognize RECs produced from electricity generated by freshwater. Thus, whereas a REC can be used in multiple years, incremental hydropower can be used for EIA compliance only in the year it is generated.²⁰ The EIA does not specify whether incremental hydropower that is used for compliance in another state, through RECs or otherwise, may also be used for EIA compliance in Washington. This raises a potential for double-counting which could affect PacifiCorp. However, through its practice of registering all owned hydroelectric generation in the Western Renewable Energy Generation Information System, PacifiCorp has satisfied the Commission that double counting is not taking place.

b. Eligible Purchases from Grant County PUD

13 Grant County PUD, a qualifying utility that is not an investor-owned utility, operates the Priest Rapids Hydroelectric Project under a license issued by FERC.²¹ The Priest Rapids Project includes two dams, Priest Rapids and Wanapum, both located on the Columbia River in central Washington. The Mid-Columbia River is home to various species of salmon and steelhead, some of which are federally listed as threatened or endangered.²² The Federal Power Act license for the continued operation of the Priest Rapids Project requires Grant County PUD to replace the Wanapum Dam turbines with a more fish-friendly design less lethal to juvenile fish, and to install and maintain an external structure that allows juvenile salmon and steelhead to pass Wanapum Dam safely without going through the turbines. Before these measures were implemented, FERC required Grant County PUD to spill water over the dam during the months when juvenile salmon

¹⁹ See ORS § 469A.052.

²⁰ RCW 19.285.030(19).

²¹ *PUD No. 2 of Grant Cnty.*, 123 FERC ¶ 61,046 (2008).

²² 50 C.F.R. §§ 223.102(a), 224.101(a).

and steelhead are migrating downstream. Grant County PUD completed the external juvenile fish bypass structure in 2008.²³ Turbine upgrades are underway.

- 14 WAC 194-37-130 allows non-investor-owned qualifying utilities that generate incremental hydropower to sell that power to other utilities as an eligible renewable resource.²⁴ Grant County PUD used some of the incremental hydropower attributable to the Wanapum Dam juvenile fish bypass for its own EIA compliance in 2012 and again in 2013, and it sold some of the remaining power to other utilities, including PacifiCorp, as an eligible renewable resource.²⁵ PacifiCorp relies on Grant County PUD's calculation of incremental hydropower efficiency gains. Grant County PUD is required to use the method in WAC 194-37-130, which is similar to Method 3 developed by the RPS Workgroup.

2. Comments of Staff and Interested Parties

- 15 Staff and RNP/NWEC agreed that PacifiCorp had acquired sufficient renewable energy to meet the 2013 target. The comments focused on the methodology by which PacifiCorp calculated incremental hydropower and on how PacifiCorp calculated the incremental cost of eligible resources.²⁶
- 16 RNP/NWEC generally supported PacifiCorp's use of the same methodology required by the Oregon Department of Energy in calculating incremental electricity from hydropower efficiency improvements. RNP/NWEC expressed a concern with PacifiCorp's report

²³ *PUD No. 2 of Grant Cnty.*, 123 FERC ¶ 61,046 (2008); *PUD No. 2 of Grant Cnty.*, 109 FERC 62,216 (2004); *PUD No. 2 of Grant Cnty.*, 108 FERC ¶ 62,075 (2004). *See generally Confederated Tribes & Bands of the Yakima Indian Nation v. FERC*, 746 F.2d 466 (9th Cir. 1984) (FERC must consider effects on fisheries before issuing licenses for mid-Columbia dams).

²⁴ *See* WAC 194-37-130(1)(a); WAC 194-37-130(3)(f); Wash. Dep't of Community, Trade, & Economic Development, *Concise Explanatory Statement, Chapter 194-37 WAC (Energy Independence Act, RCW 19.285)* at 12 (March 2008). The Commission did not address this issue in its EIA rulemaking.

²⁵ *See* Grant County PUD's 2012 and 2013 Renewable Energy Reports under WAC 194-37-110, posted on the Department of Commerce's website at <http://www.commerce.wa.gov/Programs/Energy/Office/Utilities/Pages/EnergyIndependence.aspx>.

²⁶ Regarding the eligibility of wind facilities, Staff notes that PacifiCorp's 2013 qualifying resources portfolio includes one resource not previously relied upon for Washington compliance: Wolverine Creek wind facility near Idaho Falls, Idaho. PacifiCorp purchases 100 percent of this facility's output and will apply its generation as necessary to ensure EIA compliance for 2013. Staff believes the generation is an eligible resource because Wolverine Creek came into service in February 2006, well after the EIA threshold date of March 31, 1999.

with regard to allowing purchases of incremental electricity from Mid-Columbia hydropower generation facilities, such as Grant and Chelan counties, without adequate assurances that those generators' calculation methodology was at least as accurate as that used by investor-owned utilities. Even so, RNP/NWEC recommended that the Commission accept the incremental hydropower figures in PacifiCorp's RPS Report for 2013 compliance.

- 17 While generally supporting Method 2, Staff criticizes PacifiCorp's methodology for estimating its incremental hydropower generation because it relies on a model built on only four years of production, not five years, as the RPS Workgroup recommended. Further, PacifiCorp's model omits negative efficiencies, possibly distorting its calculations. Nevertheless, Staff acknowledges that PacifiCorp's methodology is acceptable for the 2013 filing.
- 18 Staff also raised concerns with Grant County's model for incremental hydropower generation at the Wanapum Dam. Although Staff notes improvements in Grant County's approach from 2012, Staff believes the model continues to suffer from a misrepresentation of the historical average because of the selected time period (1978 to 1990) to establish that average. Staff is pursuing these concerns with the State Auditor's office and recommends against finalizing PacifiCorp's 2012 compliance until this issue is resolved. Staff points out that PacifiCorp has until June 1, 2014, to request a final compliance determination for 2012 in Docket UE-120813.
- 19 Staff and RNP/NWEC also expressed concern that PacifiCorp, Puget Sound Energy, Inc. (PSE), and Avista Corporation (Avista) had not used consistent methods for calculating the incremental cost of eligible renewable resources under RCW 19.285.050(1)(b) and WAC 480-109-030(1). Staff recommends provisional acceptance of each utility's reported calculations for 2013 but seeks additional time to work with the utilities, the Department of Commerce, and other stakeholders to refine and develop a uniform methodology for future compliance filings.

3. Commission Decision

- 20 The Commission accepts PacifiCorp's calculation of its renewable energy target for 2013 and determines that the Company has identified sufficient resources to meet that target. The Commission will make its final determination on whether PacifiCorp has met its 2013 target when the Company requests such a finding, which PacifiCorp must make no later than June 1, 2015.

- 21 The Commission agrees with PacifiCorp, RNP/NWEC, and Commission Staff that the methodology that PacifiCorp has used to calculate incremental electricity from hydropower efficiency improvements, as well as the numbers PacifiCorp has derived from using the methodology, are acceptable for determining whether PacifiCorp has met its 2013 renewable energy target under RCW 19.285.040(2)(a)(i). The Commission also agrees with RNP/NWEC and Commission Staff that in future filings PacifiCorp should calculate incremental electricity from hydropower efficiency improvements using at least five years of historical data.
- 22 The Commission notes the concerns of RNP/NWEC and Commission Staff regarding the manner in which utilities calculate the incremental cost of eligible renewable resources. For the purpose of meeting the June 1, 2013, reporting requirements only, the Commission accepts the conclusions PacifiCorp reached in its RPS Report but does so without approving the Company's methodology. The Commission directs the Staff to engage with PacifiCorp, PSE, and Avista to develop a uniform, acceptable methodology for making the "incremental cost" calculation, either through rulemaking or informal workshops.

D. Discussion of 2014 Targets

- 23 As required by Commission rule, PacifiCorp also described "the steps [it] is taking to meet the renewable resource requirements for the current year."²⁷ NWEC/RNP argued that this language also requires the Company to report on the progress in 2013 toward meeting the January 1, 2014 target. Staff disagreed, stating that the term "current year" in this regulatory requirement means that the utility must demonstrate its progress toward meeting the 2013 requirement. We agree with Staff on this point and will not require PacifiCorp to describe its steps toward meeting the 2014 target in this filing.

FINDINGS AND CONCLUSIONS

- 24 (1) The Washington Utilities and Transportation Commission is an agency of the state of Washington vested by statute with the authority to regulate the rates, rules, regulations, practices, accounts, securities, transfers of property and affiliated interests of public service companies, including electrical companies.
- 25 (2) PacifiCorp is an electric utility and a public service company subject to Commission jurisdiction.

²⁷ WAC 480-109-040(1)(d).

- 26 (3) PacifiCorp serves more than 25,000 customers within the State of Washington, and it is a “qualifying utility” within the meaning of RCW 19.285.030(18).
- 27 (4) PacifiCorp has properly calculated its renewable energy target for 2013 to be 120,716 megawatt-hours.
- 28 (5) All of the hydroelectric facilities listed in PacifiCorp’s RPS Report are located in the Pacific Northwest, and all are owned by a qualifying utility. All of the hydroelectric efficiency improvements listed in PacifiCorp’s RPS Report were completed after March 31, 1999. PacifiCorp has demonstrated that as of January 1, 2013, it had the right to at least 2,234 megawatt-hours of eligible renewable resources attributable to these hydroelectric efficiency improvements to apply toward its 2013 target.
- 29 (6) All of the wind facilities listed in PacifiCorp’s RPS Report are located in the Pacific Northwest and will have commenced operation after March 31, 1999. The electricity they generate is an eligible renewable resource. PacifiCorp has demonstrated that as of January 1, 2013, it had the right to apply at least 118,483 megawatt-hours of eligible renewable resources attributable to these wind facilities toward the Company’s 2013 target.
- 30 (7) By January 1, 2013, PacifiCorp had acquired sufficient eligible renewable resources to supply at least three percent of its load for the remainder of 2013.
- 31 (8) PacifiCorp has met the reporting requirements of RCW 19.285.070 and WAC 480-109-040(1), including PacifiCorp’s plan for meeting its RPS obligation for the remainder of 2013.
- 32 (9) Pursuant to WAC 480-109-040(5), PacifiCorp must provide a summary of its RPS Report to its customers, by bill insert or other suitable method, within ninety days of the date of this Order.
- 33 (10) The Commission makes no findings or conclusions concerning whether Grant County Public Utility District has complied with the EIA.
- 34 (11) The Commission directs PacifiCorp to work with the other electric utilities and the Staff to develop a uniform, acceptable methodology for making the “incremental cost” calculation, either through rulemaking or informal workshops.

ORDER

THE COMMISSION ORDERS:

- 35 (1) The Commission accepts the calculation of 120,716 megawatt-hours as the 2013
renewable energy target for PacifiCorp d/b/a Pacific Power and Light Company.
- 36 (2) PacifiCorp d/b/a Pacific Power and Light Company has identified eligible
renewable resources and renewable energy credits sufficient to supply at least
three percent of its load for 2013.
- 37 (3) PacifiCorp d/b/a Pacific Power and Light Company has complied with the June 1,
2013, reporting requirements pursuant to WAC 480-109-040.
- 38 (4) PacifiCorp d/b/a Pacific Power and Light Company must file a second report no
later than June 1, 2015, that provides the information necessary to determine
whether PacifiCorp met the 2013 renewable energy target of 120,716 megawatt-
hours.

DATED at Olympia, Washington, and effective September __, 2013.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chairman

PHILIP B. JONES, Commissioner

JEFFREY D. GOLTZ, Commissioner