

August 23, 2019

**VIA ELECTRONIC FILING**

Mark L. Johnson  
 Executive Director and Secretary  
 621 Woodland Square Loop SE  
 Lacey, WA 98503

**RE: Docket UE-190448—Pacific Power’s Revised 2019 Annual Renewable Portfolio Standard Report**

Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, submitted its 2019 Annual Renewable Portfolio Standard (RPS) Report to the Washington Utilities and Transportation Commission on May 31, 2019. In response to feedback received at the August 8, 2019 open meeting, Pacific Power met with Staff, Public Counsel, and NVEC to reach an agreement on the treatment of confidential information in the company’s report.

Notwithstanding the company’s continued concern that customers may be exposed to a level of market price risk associated with public disclosure of compliance information, Pacific Power has agreed to publicly release certain components of the company’s report to accommodate requests from stakeholders.

The only remaining confidential information within the company’s 2019 report is resource-specific renewable energy credit (REC) prices and cost information that could be used to derive those prices. This information is redacted in the following places:

Location	Type of Information	Explanation
Narrative Report, p.9	Cost per REC Column	This column contains confidential REC prices for individual resources or contracts (Bennett Creek, Hot Springs, Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, and Pavant Solar) can be derived from this column coupled with the “Number of RECs” column.
Narrative Report, p.9	Annual Cost of Renewable Energy Credits Column	Confidential REC prices for individual resources or contracts (Bennett Creek, Hot Springs, Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, and Pavant Solar) can be derived from this column coupled with the “Number of RECs” column. Alternatively, a total value is provided across all contracts to enable calculation of an average cost/REC.
Attachment C, Tab 1	Incremental Levelized Cost Column	Redacted cells in this column contain confidential REC prices for individual resources or contracts (Bennett Creek, Hot Springs, Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, and Pavant Solar).
Attachment C, Tab 2	Sum of incremental costs of all eligible resources Column	Confidential REC prices for each individual resource or contract (Bennett Creek, Hot Springs, Enterprise Solar, and Pavant Solar) can be derived from this

		column coupled with the “RECs generated or purchased” column.
Attachment C, Tab 3	Sum of incremental costs of all eligible resources Column	Confidential REC prices for each individual resource or contract (Bennett Creek, Hot Springs, Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, and Pavant Solar) can be derived from this column coupled with the “RECs generated or purchased” column.
Attachment C, Tab 4	Total Incremental Cost (as dollar \$ amt.) Column	Confidential REC prices for each individual resource or contract (Bennett Creek, Hot Springs, Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, and Pavant Solar) can be derived from this column coupled with the “MWh” column.
Attachment C, Tab 4	Total Incremental Cost (\$/MWh) Column	Redacted cells in this column contain confidential REC prices for individual resources or contracts (Bennett Creek, Hot Springs, Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, and Pavant Solar). The incremental cost of unbundled REC purchases equals the REC price.
Attachment C, Tab 4	Total Incremental Cost (\$/MWh) Multiplied by Number of Megawatt-hours Needed for Target Year Compliance Column	Confidential REC prices for each individual resource or contract (Bennett Creek, Hot Springs, Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, and Pavant Solar) can be derived from this column coupled with the “MWh” column. Because the company anticipates using all available MWh from these resources in the compliance year, the numbers in this column are equal to the Total Incremental Cost (as dollar \$ amt.) column.
Cost Analysis Workpaper, Summary Tab	Dollars Per REC / MWh Column, Wind and Solar REC contracts	These cells contain confidential REC prices for individual resources or contracts (Bennett Creek, Hot Springs, Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, and Pavant Solar).
Cost Analysis Workpaper, Summary Tab	Total Dollars Column, Wind and Solar REC contracts	Confidential REC prices for each individual resource or contract (Bennett Creek, Hot Springs, Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, and Pavant Solar) coupled with “2018 RECs/MWh” and “2019 RECs/MWh” columns.
Cost Analysis Workpaper, Summary Tab	2018 Subtotal Wind Resource Cost	This cell contains cost information that could be used to derive the confidential REC prices for the single Bennet Creek and Hot Springs REC contract (cell J25 - sum of cells J13-J21). *This subtotal is not provided elsewhere in any of the attachments or workpapers in this report.
Cost Analysis Workpaper, Summary Tab	2018 Subtotal Solar Resource Cost	This cell contains cost information that would only aggregate REC contract prices across two contracts. *This subtotal is not provided elsewhere in any of the attachments or workpapers in this report.
Cost Analysis Workpaper, Summary Tab	2019 Subtotal Wind Resource Cost	This cell contains cost information that could be used to derive the confidential REC prices for the single Bennet Creek and Hot Springs REC contract (cell U24 - sum of cells U13-J20).

		*This subtotal is not provided elsewhere in any of the attachments or workpapers in this report.
Cost Analysis Workpaper, Summary Tab	2019 Subtotal Solar Resource Cost	This cell contains cost information that could be used to derive the confidential REC prices for the single Bennet Creek and Hot Springs REC contract (cell U46 - U44 - U35 - sum of cells U13-U20). *This subtotal is not provided elsewhere in any of the attachments or workpapers in this report.
PacifiCorp Hydro Analysis Workpapers (for JC Boyle 2, Lemolo 1 and 2, Prospect 21)	All columns left of the summary table and graph	These cells contain monthly, daily, and hourly hydroelectric generation and flow data. The company has protected hourly and finer information under the Federal Freedom of Information Act as confidential business information and requests consistent treatment here.

Pacific Power requests confidential treatment of the above referenced information in accordance with WAC 480-07-160. The documents labeled as confidential include proprietary cost data related to renewable energy credits and 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. PacifiCorp Hourly Incremental Hydro Analysis workpapers labeled as confidential include proprietary hourly hydroelectric data. This confidential business information could also expose the company to competitive injury if disclosure is unrestricted. Accordingly, Pacific Power 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)(b).

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

Sincerely,

                    /s/                      
 Etta Lockey  
 Vice President, Regulation  
 Pacific Power & Light Company  
 825 NE Multnomah Street, Suite 2000  
 Portland, OR 97232  
 (503) 813-5701  
 etta.lockey@pacificorp.com

Enclosures:

NEED LIST OF FILES HERE