

2020 WA EIA Renewable Portfolio Standard

Staff's Expectations re: Plan Reports

The following is a list of Staff expectations regarding the calculation of incremental costs (IC) of re-powered eligible wind facilities and the communication of confidential information in the upcoming 2020 Renewable Portfolio Standard (RPS) plan reports that WA electric IOUs are required to file by June 1, 2020.¹ These expectations constitute a primary outcome of the 2020 RPS stakeholder working group (WG) convened by WA-UTC staff. All participating WG stakeholders (i.e., Pacific Power, Puget Sound Energy, Avista, NW Energy Coalition, Public Counsel) concurred with these expectations as of May 1, 2020.

WG stakeholders agreed these expectations should be filed within the electric IOUs' 2019 RPS dockets (i.e., Avista UE-190445, Puget Sound Energy UE-190411, Pacific Power UE-190448) to provide consistent and transparent guidance relevant to the development of the 2020 RPS plan reports.

Wind re-powering incremental costs (IC)

- As part of 2020 RPS plan report filing, **Pac Power** will file:
 1. Wind re-powering IC petition previously circulated w/ WG
 2. Confidentiality position language within narrative report, likely adjacent to redacted data tables (e.g., p. 9 of 2019 RPS plan report)
 3. Updated one-time ICs reflecting Alt 4 methodology, previously agreed to by WG, for relevant, re-powered facilities:
 - West Control Area (WCA) facilities (i.e., Goodnoe Hills, Leaning Juniper, Marengo I & II)
 - East-side facilities (i.e., Top of the World, Dunlap I, Seven Mile Hill I, Glenrock I, Campbell Hill)
 4. Unredacted RPS Resource Cost Analysis workpaper explaining wind re-powering IC methodology
 - a. *WP format likely similar to resource cost analysis document discussed during WG meeting #2 (see Attach A)*
- If either AVA or PSE are planning to include wind re-powered eligible facilities as part of their respective 2020 RPS plan reports, the other IOUs also agree to follow the above, same approach as Pac Power.
- Other than wind re-powering, staff assumes no electric IOU will propose including in respective 2020 RPS plan report eligible facilities that have been upgraded and/or renovated.

Confidentiality considerations

- As part of 2019 RPS plan report filings:
 - AVA redacted IC supporting workpaper F
 - PSE redacted REC revenue / price workpaper Attach 4

¹ See [WAC 480-109-210](#).

- Pac Power redacted REC prices for individual resources & contracts in
 - Narrative report, p. 9
 - Incremental costs Attach C
 - Resource cost analysis workpaper 2a
 - Incremental hydro workpapers
- Assuming 2020 RPS plan report contents are similar to 2019 RPS plans, IOUs would:
 1. File confidentiality crosswalk document similar to revised Pac Power confidentiality crosswalk discussed during WG meeting #5 (*see Attach B*)
 2. Insert confidentiality position language within report narrative adjacent to redacted data similar to language Pac Power plans to insert adjacent to unbundled REC cost table (*see Attach C*)
 3. Not redact any additional material in 2020
- As reminders:
 - Per [WAC 480-07-160](#)(5) and (8), only the specific confidential content (e.g., spreadsheet cells) within a larger file (e.g., Excel workbook) are to be redacted.
 - Per [WAC 480-07-140](#)(6)(a)(ii), confidential & redacted files need to be filed in native formats (e.g., company cannot redact entire Excel workbook by providing single PDF sheet just stating, “Confidential per WAC 480-07-160 and RCW 80-04-095”)