

June 1, 2020

VIA ELECTRONIC FILING

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 Executive Director and Secretary
 Washington Utilities and Transportation Commission
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 COMMISSION

RE: PacifiCorp's 2020 Annual Renewable Portfolio Standard Report

PacifiCorp dba Pacific Power & Light Company submits its 2020 Annual Renewable Portfolio Standard (RPS) Report to the Washington Utilities and Transportation Commission in accordance with RCW 19.285.070 and WAC 480-109-210(1).

PacifiCorp requests confidential treatment in accordance with WAC 480-07-160. The documents labeled as confidential include proprietary cost data and confidential information 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. Accordingly, PacifiCorp 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).

PacifiCorp continues to be concerned that customers may be exposed to a level of market price risk associated with public disclosure of compliance information, but has agreed to publicly release certain components of the report as agreed upon with stakeholders in the informal RPS workgroup.

The only remaining confidential information within the 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	Annual Cost of Renewable Energy Credits Column	Confidential REC prices for individual resources or contracts (Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, Pavant Solar, Granite Mountain East, and Granite Mountain West) 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.

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Narrative Report, p.9	Cost per REC Column	This column contains confidential REC prices for individual resources or contracts (Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, Pavant Solar, Granite Mountain East, and Granite Mountain West).
Attachment C, Tab 1, Cells B38-B45	Incremental Levelized Cost Column	Redacted cells in this column contain confidential REC prices for individual resources or contracts (Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Enterprise Solar, Pavant Solar, Granite Mountain East, and Granite Mountain West).
Attachment C, Tab 2, Cells B31-B36	Sum of incremental costs of all eligible resources Column	Confidential REC prices for each individual resource or contract (Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Pavant Solar, and Enterprise Solar) can be derived from this column coupled with the “RECs generated or purchased” column.
Attachment C, Tab 3, Cells B31-B36 and E31-E36	Sum of incremental costs of all eligible resources Columns	Confidential REC prices for each individual resource or contract (Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Pavant Solar, and Enterprise Solar) can be derived from this column coupled with the “RECs generated or purchased” column.
Attachment C, Tab 4, Cells B20-B25 and B46-B53	Total Incremental Cost (as dollar \$ amt.) Column	Redacted cells in this column contain confidential REC prices for individual resources or contracts (Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Pavant Solar, Enterprise Solar, Granite Mountain East, and Granite Mountain West)
Attachment C, Tab 4, Cells D20-D25 and D46-D53	Total Incremental Cost (\$/MWh) Column	Confidential REC prices for each individual resource or contract (Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Pavant Solar, Enterprise Solar, Granite Mountain East, and Granite Mountain West) can be derived from this column coupled with the “MWh” column.
Attachment C, Tab 4, Cells F20-F25 and F46-F53	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 (Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Pavant Solar, Enterprise Solar, Granite Mountain East, and Granite Mountain West) 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, Cells H29-H34	Dollars Per REC / MWh Column, Solar REC contracts	These cells contain confidential REC prices for individual resources or contracts (Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Pavant Solar, and Enterprise Solar).
Cost Analysis Workpaper, Summary Tab, Cells J29-J34	Total Dollars Column, Solar REC contracts	Confidential REC prices for each individual resource or contract (Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Pavant Solar, and Enterprise Solar) coupled with “2019 RECs/MWh” and “2020 RECs/MWh” columns.

