

825 NE Multnomah, Suite 2000 Portland, Oregon 97232

> AND TRANSP COMMISSION

tate Of WAS

June 1, 2020

VIA ELECTRONIC FILING

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

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	Confidential REC prices for individual resources or
	Renewable Energy	contracts (Adams Solar, Bear Creek Solar, Bly Solar,
	Credits Column	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.

Received Records Management 06/01/20 08:56

Narrative Report, p.9	Cost per REC	This column contains confidential REC prices for
runanie Report, p.9	Column	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,	Incremental	Redacted cells in this column contain confidential
Cells B38-B45	Levelized Cost	REC prices for individual resources or contracts
	Column	(Adams Solar, Bear Creek Solar, Bly Solar, Elbe
		Solar, Enterprise Solar, Pavant Solar, Granite
		Mountain East, and Granite Mountain West).
Attachment C, Tab 2,	Sum of incremental	Confidential REC prices for each individual resource
Cells B31-B36	costs of all eligible	or contract (Adams Solar, Bear Creek Solar, Bly Solar,
	resources Column	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,	Sum of incremental	Confidential REC prices for each individual resource
Cells B31-B36 and	costs of all eligible	or contract (Adams Solar, Bear Creek Solar, Bly Solar,
E31-E36	resources Columns	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,	Total Incremental	Redacted cells in this column contain confidential
Cells B20-B25 and	Cost (as dollar \$	REC prices for individual resources or contracts
B46-B53	amt.) Column	(Adams Solar, Bear Creek Solar, Bly Solar, Elbe
		Solar, Pavant Solar, Enterprise Solar, Granite
		Mountain East, and Granite Mountain West)
Attachment C, Tab 4,	Total Incremental	Confidential REC prices for each individual resource
Cells D20-D25 and	Cost (\$/MWh)	or contract (Adams Solar, Bear Creek Solar, Bly Solar,
D46-D53	Column	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,	Total Incremental	Confidential REC prices for each individual resource
Cells F20-F25 and	Cost (\$/MWh)	or contract (Adams Solar, Bear Creek Solar, Bly Solar,
F46-F53	Multiplied by	Elbe Solar, Pavant Solar, Enterprise Solar, Granite
1 40-1 55	Number of	Mountain East, and Granite Mountain West) can be
	Megawatt-hours	derived from this column coupled with the "MWh"
	Needed for Target	column. Because the company anticipates using all
	Year Compliance	available MWh from these resources in the compliance
	Column	year, the numbers in this column are equal to the Total
		Incremental Cost (as dollar \$ amt.) column.
Cost Analysis	Dollars Per REC /	These cells contain confidential REC prices for
Workpaper,	MWh Column, Solar	individual resources or contracts (Adams Solar, Bear
Summary Tab, Cells	REC contracts	Creek Solar, Bly Solar, Elbe Solar, Pavant Solar, and
H29-H34		Enterprise Solar).
Cost Analysis	Total Dollars	Confidential REC prices for each individual resource
Workpaper,	Column, Solar REC	or contract (Adams Solar, Bear Creek Solar, Bly Solar,
Summary Tab, Cells	contracts	Elbe Solar, Pavant Solar, and Enterprise Solar)
J29-J34		coupled with "2019 RECs/MWh" and "2020
		RECs/MWh" columns.

Washington Utilities & Transportation Commission June 1, 2020 Page 3

Cost Analysis Workpaper, Summary Tab, Cells S27-S34	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, Enterprise Solar, Granite Mountain East, and Granite Mountain West).
Cost Analysis Workpaper, Summary Tab, Cells U27-S34	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, Enterprise Solar, Granite Mountain East, and Granite Mountain West) coupled with "2019 RECs/MWh" and "2020 RECs/MWh" columns.

Also enclosed with this filing is a petition for waiver of WAC 480-109-210(2)(a)(i). During the informal RPS workgroup process, stakeholders agreed to support a one-time petition to waive the requirement to (a) make a *one-time* incremental cost calculation for each eligible resource included in such utility's Renewable Portfolio Standard (RPS) report, and (b) identify the capacity value of each eligible renewable resource as calculated in the utility's most recent integrated resource plan (IRP) *acknowledged* by the Commission. Stakeholders agreed that a more permanent solution would be discussed as part of the ongoing CETA rulemakings.

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

Sincerely,

/s/ . Michael Wilding Director, Net Power Costs and Regulatory Policy PacifiCorp 825 NE Multnomah Street, Suite 2000 Portland, OR 97232 (503) 813-5431 michael.wilding@pacificorp.com

Enclosures: NEW-PPL-RPS-6-1-20 (C).zip NEW-PPL-RPS-6-1-20 (R).zip