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**PacifiCorp
dba Pacific Power & Light Company**

**2020 Renewable Portfolio Standard Report
Washington**

July 20, 2020

REDACTED UNDER WAC 480-07-160

TABLE OF CONTENTS

Introduction.....	2
Executive Summary	3
Annual Load for Previous Two Years and Renewable Energy Target.....	4
Renewable Energy Acquired to Meet Renewable Energy Target	5
Resource Name.....	5
Location.....	5
Alternative Compliance	10
Resource Cost Compared to Annual Retail Revenue Requirement.....	10
Multistate Allocations.....	12
Prior Year Progress	14
Current Year Progress.....	15
Supporting Documents for Renewable Report	15
List of Attachments.....	16
Attachment A – Washington Utilities and Transportation Commission RPS Report Tool	16
Attachment B – PacifiCorp Description of Incremental Hydro Methodology and Oregon Department of Energy Correspondence on Updated Certification for Efficiency Upgrades at Eleven Hydropower Generating Units	16
Attachment C – PacifiCorp Incremental Cost Report (Confidential)	16

Introduction

PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) submits this 2020 Annual Renewable Portfolio Standard Report (RPS Report) to the Washington Utilities and Transportation Commission (Commission) in accordance with reporting requirements established as part of the Energy Independence Act (EIA). The report is consistent with RCW 19.285.070, which states, in relevant part:

- (1) On or before June 1, 2012, and annually thereafter, each qualifying utility shall report to the department on its progress in the preceding year in meeting the targets established in RCW 19.285.040, including expected electricity savings from the biennial conservation target, expenditures on conservation, actual electricity savings results, the utility's annual load for the prior two years, the amount of megawatt-hours needed to meet the annual renewable energy target, the amount of megawatt-hours of each type of eligible renewable resource acquired, the type and amount of renewable energy credits acquired, and the percent of its total annual retail revenue requirement invested in the incremental cost of eligible renewable resources and the cost of renewable energy credits.*
- (2) A qualifying utility that is an investor-owned utility shall also report all information required in subsection (1) of this section to the commission, and all other qualifying utilities shall also make all information required in subsection (1) of this section available to the auditor.*

This report is consistent with the collaborative workshop documents addressing annual reporting requirements from Docket UE-110523, Order 01 in Docket UE-120813, Order 01 in Docket UE-140802, and Docket UE-131723.

Executive Summary

Under RCW 19.285.040(2)(a) and WAC 480-109-200(1), each qualifying utility must use eligible renewable resources, equivalent renewable energy credits (RECs), or a combination of both to meet annual targets under Washington’s renewable portfolio standard (RPS). As demonstrated in this report, PacifiCorp met the 2019 renewable energy target with a combination of eligible renewable resources and RECs and will use a combination of eligible renewable resources and RECs to supply at least fifteen percent of its average Washington load to satisfy the 2020 renewable energy target.

A summary of the company’s 2019 and 2020 renewable targets and eligible renewable resources and RECs are provided below:

Table 1

PacifiCorp Renewable Target, Eligible Resource and RECs		
	2019	2020
Average Retail Sales (MWh)	4,085,207	4,046,853
Percentage Target	9%	15%
Renewable Target	367,669	607,028
Qualifying Resources & RECs (MWh)	367,669	607,028

The company does not intend to rely on any of the alternative compliance mechanisms provided in WAC 480-109-210 for meeting either the 2019 or 2020 renewable energy targets.

Annual Load for Previous Two Years and Renewable Energy Target

Under RCW 19.285.040(2)(c) and WAC 480-109-200(1), a utility must calculate its annual target based on its average load for the previous two years. Accordingly, using the average of Washington annual retail loads for the previous two years, Table 2 calculates the company's annual renewable targets for 2019 and 2020.

Table 2

Target Year 2019	
Prior Year Retail Sales (2017)	4,221,298 MWh
Prior Year Retail Sales (2018)	3,949,116 MWh
Average Retail Sales	4,085,207 MWh
Percentage Target	9%
Renewable Target	367,669 MWh/RECs
Target Year 2020	
Prior Year Retail Sales (2018)	3,949,116 MWh
Prior Year Retail Sales (2019)	4,144,590 MWh
Average Retail Sales	4,046,853
Percentage Target	15%
Renewable Target	607,028 MWh/RECs

Renewable Energy Acquired to Meet Renewable Energy Target

PacifiCorp met its 2019 renewable resource target and plans to meet its 2020 renewable resource target with a combination of eligible RECs, company- and third-party-owned wind resources, and hydroelectric facilities with upgrades completed after March 1999. Included with this report as Confidential Attachment A is the Commission's RPS Report Tool, which details the renewable resource targets for 2019 and 2020 and the RECs and renewable resources identified to meet the 2019 and 2020 targets.

PacifiCorp will use the following company- and third-party-owned wind facilities for 2019:

Table 3

Resource Name	Location
Goodnoe Hills	Washington
Leaning Juniper	Oregon
Marengo I	Washington
Marengo II	Washington
Dunlap I	Wyoming
Glenrock Wind I	Wyoming
Campbell Hill/Three Buttes	Wyoming
Top of the World	Wyoming
Seven Mile Hill I	Wyoming

Four of these eight wind facilities are located in the Pacific Northwest. The remainder are located in Wyoming and qualify as eligible to meet Washington's RPS.¹ Descriptions of the projects are referenced in the Supporting Documents for Renewable Report section of this RPS Report and on the company's website.

Additionally, PacifiCorp identified the following upgrades to hydroelectric facilities located in the Pacific Northwest that were completed after March 31, 1999:

Table 4

Resource Name	Upgrade Date
Prospect 2	1999
Lemolo 1	2003
JC Boyle	2005
Lemolo 2	2009

PacifiCorp performed analyses to determine the incremental energy associated these upgrades to hydroelectric facilities, consistent with Method Two in WAC 480-109-200(7)(c). The methodology, described in more detail in Attachment B of this report, is consistent with the

¹ In Docket UE-151162, Order 01, the Commission found all of these resources to be eligible renewable resources under RCW 19.285.030(12)(e).

methodology the company submitted to the Oregon Department of Energy to certify these facilities and calculate the percentage of incremental energy for the Oregon RPS program. The company performed an analysis of the incremental energy for upgrades to hydroelectric facilities that includes actual generation data from 2007 through 2012. The company re-submitted the analysis to the Oregon Department of Energy in December 2013, and the Oregon Department of Energy approved the updated incremental hydropower efficiency percentages effective January 2014. The eligibility was reviewed and made effective once again by the Oregon Department of Energy in December 2015. The company is providing the analyses in Confidential Work Papers—PacifiCorp Hourly Incremental Hydro Analyses.

In January 2017, PacifiCorp contracted to purchase the RECs from six Washington-RPS-eligible solar projects over a consecutive ten-year term.

PacifiCorp also intends to use two new resources to meet its RPS target in 2020. On November 6, 2019, the company executed a single-year, 2020-vintage REC purchase, for Washington only, to address a forecast, short-term compliance shortfall in 2020. These two solar facilities, Granite Mountain East and Granite Mountain West, are located in Salt Lake County, Utah—a state in which PacifiCorp serves retail electrical customers. The facilities were commercially operational September 21, 2016, and September 30, 2016, respectively. The company also purchases the energy from these facilities under a twenty-year qualifying-facility power purchase agreement.² These facilities are registered in the Western Renewable Energy Generation Information System (WREGIS).³

Pages 7-10 of this RPS Report contain information required by Commerce that will be resubmitted to Commerce upon Commission approval of this report. These pages include a summary of the forecasted number of megawatt-hours and RECs to meet the 2020 compliance target.

Please see Table 5 of this report for a summary of PacifiCorp’s expected Washington-allocated resource costs compared to the annual revenue requirement.

² WAC 480-109-060 (12)(e)

³ See Attachment A – RPS Report Tool for WREGIS IDs.

Energy Independence Act (I-937) Commerce Renewable Report – 2020

Energy Independence Act (EIA) **Renewable Energy Report 2020**

Utility	Pacific Power & Light Company
Report Date	June 1, 2020
Utility Contact Name/Dept	Ariel Son
Phone	(503) 813-5410
Email	ariel.son@pacificorp.com, jessica.zahnow@gmail.com

Loads and Resources	
2018 Annual Load (MWh)	3,949,116
2019 Annual Load (MWh)	4,144,590
Average of 2018 & 2019 Annual Loads (MWh)	4,046,853
2020 Renewable Target (% of load)	15%
2020 Eligible Renewable Energy Target (MWh)	607,028
2020 Eligible Renewable Resources and RECs	607,028

2020 Compliance Method:

- RPS Target [RCW 19.285.040(2)(a)]
- Resource Cost [RCW 19.285.050]
- No Load Growth [RCW 19.285.040(2)(d)]

Expenditures on Renewable Resources and RECs - 2020	
Amount invested in incremental cost of eligible renewable resources and the cost of RECs	\$5,710,260
Total annual retail revenue requirement - 2020	\$330,209,153
Investment in renewables and RECs as a percent of retail revenue requirement	1.7%

	Water	Wind	Solar	Geothermal	Landfill Gas	Wave, Ocean, Tidal	Gas from Sewage Treatment	Biodiesel	Biomass	Swamp Biomass (pre-2000)	Apprentice Labor Credit	Distributed Generation Credits
Eligible Renewable Resources (MWh)	1,582	424,936	-	-	-	-	-	-	-	-	-	-
Renewable Energy Credits	-	-	180,510	-	-	-	-	-	-	-	-	-
Total Renewables (MWh+RECs)	1,582	424,936	180,510	-	-	-	-	-	-	-	-	-

2020 Reporting Year:
 This renewable energy report summarizes the eligible renewables resources and renewable energy credits (RECs) that the utility has acquired by January 1, 2020 for the purpose of meeting its Energy Independence Act (EIA) renewables target for 2020. The actual resources and RECs used to comply with the 2020 EIA target may vary from those reported here. Utilities will report in June of 2022 on the actual results for 2020.

Compliance Methods:
 The EIA provides three compliance methods for utilities:
 -- Meet the renewable energy target using any combination of renewable resources and RECs. The target for 2020 is 15% of the utility's load.
 -- Invest at least 4% of the utility's annual revenue requirement in the incremental cost of renewable resources and RECs.
 -- Invest at least 1% of its annual revenue requirement in renewable resources and RECs. This option is available only to certain utilities that are not growing.

All utilities must report the renewable resources and RECs acquired for the 2020 target year. Utilities that elect to use a compliance method based on renewable investments must provide additional information demonstrating compliance with that method. Refer to WAC 194-37-110(2) and (3) for specific requirements.

NOTE: This is a general explanation of the renewable energy requirements of the Energy Independence Act, intended to help members of the public understand the information reported by the utility. Consult Chapter 19.285 RCW and Chapter 194-37 WAC for details.

Energy Independence Act (I-937) Commerce Renewable Report – 2020

Renewable Resources

Utility Pacific Power & Light Company
Compliance Year 2020

WREGIS ID	Facility Name	Resource Type	Apprentice Labor Eligibility	Generation Amount (MWh)	Apprentice Labor Amount (MWh equiv.)	Explanatory Notes (as needed)
W536	Goodnoe Hills - Goodnoe Hills	Wind	No	41,836	-	
W200	Leaning Juniper I - Leaning Juniper I	Wind	No	47,926	-	
W185	Marengo - Marengo	Wind	No	67,666	-	
W772	Marengo II - Marengo II	Wind	No	33,925	-	
W1749	Top of the World - Top of the World	Wind	No	69,810	-	
W1687	Dunlap I - Dunlap I	Wind	No	40,628	-	
W964	Glenrock I - Glenrock I	Wind	No	47,182	-	
W1383	Campbell Hill - Campbell Hill	Wind	No	45,256	-	
W975	Seven Mile Hill I - Seven Mile Hill I	Wind	No	30,707	-	
W180	JC Boyle - JC Boyle	Water	No	13	-	
W157	Lemolo 1 - Lemolo 1	Water	No	1,176	-	
W158	Lemolo 2 - Lemolo 2	Water	No	109	-	
W140	Prospect 2 - Prospect 2	Water	No	284	-	

Renewable Energy Credits

Utility Pacific Power & Light Company
Compliance Year 2020

WREGIS ID	Facility Name	REC Vintage (Year)	Resource Type	Apprentice Labor Eligibility	Distributed Generation Eligibility	Quantity RECs	Apprentice Labor Amount MWh equiv.	Distributed Generation Amount MWh equiv.	Explanatory Notes (as needed)
W7039	Adams Solar Center - Adams Solar Center	2019	Solar	No	No	125	-	-	
W7047	Bear Creek Solar Center - Bear Creek Solar Center	2019	Solar	No	No	141	-	-	
W7046	Bly Solar Center - Bly Solar Center	2019	Solar	No	No	119	-	-	
W7044	Elbe Solar Center - Elbe Solar Center	2019	Solar	No	No	125	-	-	
W4942	Granite Mountain East	2020	Solar	No	No	75,000	-	-	
W4943	Granite Mountain West	2020	Solar	No	No	75,000	-	-	
W4619	Pavant Solar, LLC - Pavant Solar, LLC	2021	Solar	No	No	10,000	-	-	
W4938	Enterprise Solar, LLC - Enterprise Solar, LLC	2021	Solar	No	No	20,000	-	-	
				No	No		-	-	

**Redacted Information is Confidential under WAC 480-07-160
Energy Independence Act (I-937) Commerce Renewable Report – 2020**

*Costs for acquired RECs may be provided on an aggregated basis when there are sufficient and multiple contracts to obscure the contract price for any single resource or contract. Costs for acquired RECs from an individual resource may be provided five years from execution of the contract for that resource. The cost of an unbundled REC represents the cost of a resource-independent renewable attribute, and is not indicative of the cost of any given resource type – wind, solar, etc..

Incremental Cost of Renewable Resources

Utility	Pacific Power & Light Company
Compliance Year	2020

Facility Name	WREGIS ID	MWh	Renewable Resource Annual Cost in 2020	Renewable Resource Cost per MWh	Description of Substitute Resource	Substitute Resource Annual Cost in 2020	Substitute Resource Cost per MWh	Incremental Cost of Renewable Resource in 2020
Goodnoe Hills - Goodnoe Hills	W536	41,836	\$714,958	17.09			-	\$714,958
Leaning Juniper I - Leaning Juniper I	W200	47,926	\$876,338	18.29			-	\$876,338
Marengo - Marengo	W185	67,666	\$437,830	6.47			-	\$437,830
Marengo II - Marengo II	W772	33,925	\$410,710	12.11			-	\$410,710
Top of the World - Top of the World	W1749	69,810	\$906,876	12.99			-	\$906,876
Dunlap I - Dunlap I	W1687	40,628	\$527,783	12.99			-	\$527,783
Glenrock I - Glenrock I	W964	47,182	\$612,924	12.99			-	\$612,924
Campbell Hill - Campbell Hill	W1383	45,256	\$587,904	12.99			-	\$587,904
Seven Mile Hill I - Seven Mile Hill I	W975	30,707	\$398,903	12.99			-	\$398,903
JC Boyle - JC Boyle	W180	13	-\$864	(66.44)			-	-\$864
Lemolo 1 - Lemolo 1	W157	1,176	-\$53,191	(45.23)			-	-\$53,191
Lemolo 2 - Lemolo 2	W158	109	-\$7,188	(65.95)			-	-\$7,188
Prospect 2 - Prospect 2	W140	284	-\$11,438	(40.27)			-	-\$11,438
Totals		426,518	\$5,401,546			\$0		\$5,401,546

Cost of Renewable Energy Credits

Utility	Pacific Power & Light Company
Compliance Year	2020

Facility Name	WREGIS ID	REC Vintage (Year)	Number of RECs	Annual Cost of Renewable Energy Credits	Cost per REC	Documentation of the calculation and inputs for percentage of revenue requirement invested in renewables:
Adams Solar Center - Adams Solar Center	W7039	2019	125			
Bear Creek Solar Center - Bear Creek Solar Center	W7047	2019	141			
Bly Solar Center - Bly Solar Center	W7046	2019	119			
Elbe Solar Center - Elbe Solar Center	W7044	2019	125			
Granite Mountain East	W4942	2020	75,000			
Granite Mountain West	W4943	2020	75,000			
Pavant Solar, LLC - Pavant Solar, LLC	W4619	2021	10,000			
Enterprise Solar, LLC - Enterprise Solar, LLC	W4938	2021	20,000			
Total	0	0	180,510	\$308,714		

Alternative Compliance

Under WAC 480-109-210(2)(b), the utility must state in its report if it is relying on one of the alternative compliance mechanisms provided in WAC 480-109-220 instead of meeting its renewable resource target. PacifiCorp has met its 2019 obligations and anticipates meeting its 2020 obligations without the need for an alternative compliance mechanism.

Resource Cost Compared to Annual Retail Revenue Requirement

Under RCW 19.285.070(1), a utility must report the percentage of its total annual retail revenue requirement invested in the incremental cost of eligible renewable resources and the cost of RECs. Similarly, under WAC 480-109-210, a utility must report the incremental cost of eligible renewable resources and RECs, and the ratio of this investment relative to the utility's total annual retail revenue requirement.

The incremental cost of an eligible renewable resource is defined in RCW 19.285.050(1)(b) 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 resource that does not qualify as eligible, where the resources being compared have the same contract length or facility life.

With the adoption of General Order R-578 in Docket UE-131723, the Commission revised rules implementing the EIA, codified in RCW Ch. 19.285, including the application of a new methodology for calculating incremental cost. PacifiCorp performed the incremental cost calculations as defined in WAC 480-109-210; please refer to the company's confidential work paper labeled PacifiCorp Renewable Resource Incremental Cost Methodology.

REC Costs for REC-Only Purchases

The cost of RECs from a REC-only purchase is based on the contractual price set forth in the applicable bilateral agreement between the company and the counterparty.

Incremental Costs for Wind Resources

The estimated cost of the RECs from renewable wind resources is the calculated levelized cost of each eligible renewable resource at the time of acquisition, compared to an equivalent amount of the lowest-reasonable-cost resource available to the utility at the time of the eligible resource's acquisition. The cost of RECs from PacifiCorp's resources located outside of the west control area are not included in Washington customers' rates. To determine the ratio of incremental cost to revenue requirement, resource costs *outside* the west control area are calculated using the weighted average cost of the resources *within* the west control area (Goodnoe Hills, Leaning Juniper, Marengo I and Marengo II).

PacifiCorp repowered four resources in the west control area in 2019 and 2020—Marengo I, Marengo II, Leaning Juniper, and Goodnoe Hills. These projects underwent a capital upgrade or “repowering” that changed the capacity value, extended useful life, and changed costs and

production tax credits. As of January 1, 2020, repowering was complete at Leaning Juniper and Goodnoe Hills. PacifiCorp will therefore recalculate incremental costs for repowering for those two resources in its 2020 compliance report. It will not recalculate the incremental costs of repowering for Marengo I and Marengo II.

Concurrently with the filing of this RPS Report, PacifiCorp filed a request for a one-time waiver of the requirement in WAC 480-109-210(2)(a)(i) that a utility (1) make a one-time incremental cost calculation for each eligible resource included in a utility's renewable portfolio standard report, and (2) 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. The waiver allows PacifiCorp to provide an updated incremental cost calculation to reflect the repowering of Leaning Juniper and Goodnoe Hills in this RPS Report and to use the capacity value as calculated in the 2019 IRP progress report filed on October 18, 2019, for Goodnoe Hills.⁴

Incremental Costs for Renewable Energy from Incremental Hydroelectric Upgrades

The estimated incremental cost of eligible renewable energy from incremental hydroelectric upgrades represents the calculated levelized cost of each hydroelectric upgrade at the time of investment in the upgrade, compared to an equivalent amount of the lowest-reasonable-cost resource available to the utility at the time of the eligible resource's acquisition.

The company's work paper provided with this report and labeled PacifiCorp Renewable Resource Cost Analysis provides the key assumptions and analysis that the company used to forecast the estimated resource costs associated with the renewable resources and RECs for the target years 2019 and 2020.

Revenue Requirement

The revenue requirement amounts used in this Renewable Report are from the most recent general rate case, Docket UE-152253. The revenue requirement in both 2019 and 2020 is \$330,209,153, unchanged from 2018.⁵

Resource Costs Compared to Revenue Requirement

Table 5 shows the expected Washington-allocated resource costs (incremental cost of eligible renewable resources and the cost of RECs) compared to the annual revenue requirements for 2019 and 2020.

⁴ See PacifiCorp Renewable Resource Cost Analysis work paper for more detail.

⁵ The revenue requirement number for 2018 reported in the company's 2018 report was \$346,967,880. This number has been revised to reflect the impacts of the Tax Cuts and Jobs Act.

Table 5

Calendar Year	Total Washington Allocated Resource Costs	Washington Annual Revenue Requirement	% of Washington Expected Allocated Resource Costs to Annual Revenue Requirement
2019	\$ 1,193,422	\$ 330,209,153	0.36%
2020	\$ 4,824,030	\$ 330,209,153	1.46%

Based on this analysis, the company is able to meet its compliance obligations without exceeding the threshold of four percent of annual revenue requirement.

Multistate Allocations

Under WAC 480-109-210(e)(i), a utility serving retail customers in more than one state must allocate RECs consistent with the utility’s most recent Commission-approved inter-jurisdictional allocation methodology. This section explains how the company applied the current inter-jurisdictional allocation methodology to arrive at the number of RECs allocated to Washington customers.

PacifiCorp is a multi-jurisdictional utility providing electric retail service to more than 1.9 million customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. Approximately 133,000 of these customers are located in Washington.

PacifiCorp allocates RECs to its states consistent with the inter-jurisdictional allocation methodologies approved in each state. California uses the 2010 Protocol inter-jurisdictional allocation methodology; Idaho, Oregon, Utah and Wyoming currently use the 2017 Protocol inter-jurisdictional allocation methodology. Both the 2010 and 2017 Protocol allocate all generation-related costs, revenues, rate base balances, and RECs to each state using the system generation (SG) allocation factor. The SG factor is calculated based on each state’s contribution to PacifiCorp’s energy and capacity requirements for its entire six-state system. Using this methodology, Washington’s SG factor is approximately eight percent (*i.e.* Washington is approximately eight percent of PacifiCorp’s six-state system).

In Washington, however, PacifiCorp will use the West Control Area Inter-Jurisdictional Allocation Methodology (WCA) through 2020. This methodology allocates generation resources located in the west control area (primarily located in California, Oregon, and Washington) using the control area generation west (CAGW) allocation factor. The CAGW factor is calculated based on each state’s (California, Oregon, and Washington) contribution to PacifiCorp’s energy and capacity requirements for the west control area. Washington’s CAGW factor is approximately 22 percent (*i.e.*, Washington is approximately 22 percent of the west control area).

As a result of Washington’s use of the WCA methodology, PacifiCorp’s Washington rates reflect a CAGW share, approximately 22 percent, of generation resources located in the west control area. Accordingly, Washington customers are entitled to approximately 22 percent of RECs from these

facilities. Using different inter-jurisdictional allocation methodologies for different states, however, creates challenges because the sum of each state's allocated share may not equal 100 percent. To address this issue, PacifiCorp first allocates each state its share of RECs using the state's SG factor. Using this process, Washington receives approximately eight percent of RECs from resources in the west-control-area.

The west control area contains the following eligible resources:

- Goodnoe Hills (wind)
- Leaning Juniper (wind)
- Marengo I (wind)
- Marengo II (wind)
- Prospect 2 (incremental hydro)
- Lemolo 1 (incremental hydro)
- Lemolo 2 (incremental hydro)
- JC Boyle (incremental hydro)

PacifiCorp addresses the variance between Washington's SG share of resources in the west control area (approximately eight percent) and Washington's CAGW share (approximately 22 percent) by providing Washington RECs from other eligible resources. The EIA allows PacifiCorp to use RECs from PacifiCorp facilities in other states where PacifiCorp makes retail sales.⁶ This means that the actual RECs used to fulfill Washington's CAGW share may include RECs from resources located in any of PacifiCorp's jurisdictions or include REC purchases, but the total RECs will equal Washington's CAGW share of resources in the west control area.

If approved in the current general rate case, docket UE-191024, beginning January 1, 2021, Washington will be allocated a system generation share of all PacifiCorp's non-emitting, non-qualifying-facility resources under the Washington Inter-Jurisdictional Allocation Methodology (WIJAM).

In 2020, PacifiCorp plans to use company-owned generation from the following resources to provide Washington with its full CAGW allocation:

- Top of the World (wind – Wyoming)
- Dunlap I (wind – Wyoming)
- Glenrock I (wind – Wyoming)
- Campbell Hill/Three Buttes (wind – Wyoming)
- Seven Mile Hill I

⁶ RCW 19.285.030(12)(e)

PacifiCorp does not plan to use any third-party REC purchases to fill Washington’s CAGW allocation in 2020. Table 6 summarizes how PacifiCorp plans to supply Washington with its CAGW share of renewable generation in 2020.

Table 6: Allocation of PacifiCorp’s Eligible Generation to Washington*

	2020
Total 2020 WCA Eligible Generation (Projected)	1,278,768
Washington CAGW Factor ⁷	22.405%
Washington CAGW Allocation ⁸	286,507
SG Allocation of WCA Resources	101,188
CAGW-SG Delta from Other Eligible (Company) Resources	185,319
Adjustments from Eligible (Company) Resources	140,011
Adjustments from Purchased RECs	180,510
Final Allocation (CAGW + Adjustments)	607,028

*see Attachment C, “(2)(a)(ii)Annual-2020, estimate” tab for detail.

Any REC purchases necessary for RPS compliance in excess of Washington’s CAGW share of resources in the west control area will be reflected in Washington customers’ rates.⁹ This includes RECs already delivered per January 2017 and November 2019 solar contracts. This treatment ensures that Washington customers receive an allocation of costs and benefits of RECs proportionate to its share costs for renewable resource reflected in rates.

PacifiCorp follows WREGIS and state RPS requirements to ensure that RECs are never double-counted.

Prior Year Progress

As demonstrated in this report, PacifiCorp met its Washington 2019 RPS compliance target with a combination of eligible renewable resources, REC purchases and renewable energy from hydroelectric facilities with upgrades completed after March 1999. The company set aside the WREGIS certificates for the 2019 compliance target and, upon Commission approval, will retire these WREGIS certificates. The company is providing a listing of the WREGIS certificates that

⁷ Washington’s forecast CAGW factor for 2020.

⁸ Washington’s allocation of all RPS-eligible resources in the west control area (wind and incremental hydroelectric).

⁹ On February 9, 2017, in Docket UE-161067, the Washington Utilities and Transportation Commission approved PacifiCorp’s request seeking cost recovery for its 2016 unbundled REC purchase. On November 8, 2019, PacifiCorp submitted a petition for an order authorizing the company to defer costs associated with the purchase of unbundled RECs necessary for RPS compliance for calendar year 2020 (Docket UE-190929).

have been created in its confidential work papers labeled WREGIS Certificates for Washington Compliance for 2019¹⁰.

The company did not rely on any alternative compliance mechanisms to meet its renewable resource targets for 2019.

Current Year Progress

PacifiCorp plans to meet its Washington 2020 RPS compliance target with a combination of eligible renewable resources, REC purchases and renewable energy from hydroelectric facilities with upgrades completed after March 1999.

The company does not anticipate relying on any alternative compliance mechanisms to meet its renewable resource targets for 2020.

Supporting Documents for Renewable Report

Further information about PacifiCorp's renewable portfolio standard resources may be found at: <https://www.pacificorp.com/energy/wind-solar.html>

¹⁰ 2020 certificates used for 2019 compliance, totaling 20,916 MWhs have not yet been created in WREGIS. Q4 2019 certificates totaling 2,864 MWhs for Adams Solar, Bear Creek Solar, Bly Solar, and Elbe Solar have not yet been transferred to the company by the contract counterparty. The counterparty has demonstrated to PacifiCorp their efforts to rectify the issue and delivery of the WREGIS certificates is anticipated to occur upon creation in that system under the Operating Rules by May 30, 2020.

List of Attachments

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