

June 1, 2021

VIA ELECTRONIC FILING

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

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 State Of WASH.
 UTIL. AND TRANSP.
 COMMISSION

**RE: DO NOT REDOCKET—Docket UE-210345
 2021 Annual Renewable Portfolio Standard Report**

In accordance with RCW 19.285.070 and WAC 480-109-210(1), PacifiCorp dba Pacific Power & Light Company (PacifiCorp) submits its 2021 Annual Renewable Portfolio Standard Report to the Washington Utilities and Transportation Commission to report the company’s progress in meeting the targets established in RCW 19.285.040.

PacifiCorp requests confidential treatment in accordance with WAC 480-07-160. The documents labeled as confidential include proprietary cost data, commercially sensitive load and resource projections, confidential market analyses and business projections, and confidential information related to renewable energy credits and/or 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
Attachment C, Tab 1, Cells B38-B39	Incremental Levelized Cost Column	Redacted cells in this column contain confidential REC prices for individual resources or contracts (Granite Mountain East and Granite Mountain West).

Attachment C, Tab 2, Cells B29-B30	Sum of incremental costs of all eligible resources Column	Confidential REC prices for each individual resource or contract (Granite Mountain East and Granite Mountain West) can be derived from this column coupled with the “RECs generated or purchased” column.
Attachment C, Tab 4, Cells B18-B19	Total Incremental Cost (as dollar \$ amt.) Column	Redacted cells in this column contain confidential REC prices for individual resources or contracts (Granite Mountain East and Granite Mountain West).
Attachment C, Tab 4, Cells D18-D19	Total Incremental Cost (\$/MWh) Column	Confidential REC prices for each individual resource or contract (Granite Mountain East and Granite Mountain West) can be derived from this column coupled with the “MWh” column.
Attachment C, Tab 4, Cells F18-F19	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 (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 H39-H40	Dollars Per REC / MWh Column, Solar REC contracts	These cells contain confidential REC prices for individual resources or contracts (Granite Mountain East and Granite Mountain West).
Cost Analysis Workpaper, Summary Tab, Cells J39-J40	Total Dollars Column, Solar REC contracts	Confidential REC prices for each individual resource or contract (Granite Mountain East and Granite Mountain West) coupled with “2020 RECs/MWh”
Cost Analysis Workpaper, (1.2) Lvl_Resource Tab, Cells M27-M28	Cost Differential \$/MWh	These cells contain confidential REC prices for individual resources or contracts (Granite Mountain East and Granite Mountain West).

In compliance with RCW 19.285.070(3) and WAC 480-109-210(4), the company will post the redacted version of the renewable report on its website to make the information available to customers.

It is respectfully requested that any formal correspondence and staff requests regarding these reports be addressed to:

By e-mail (preferred) datarequest@pacificorp.com

By regular mail:
 Data Request Response Center
 PacifiCorp
 825 NE Multnomah Street, Suite 2000
 Portland, OR 97232

Washington Utilities & Transportation Commission

June 1, 2021

Page 3

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

Sincerely,

 /s/
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Enclosures:

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