

July 5, 2018

VIA ELECTRONIC FILING

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: 2018 Annual Renewable Portfolio Standard Report—Revised

Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, submitted its 2018 Annual Renewable Portfolio Standard Report to the Washington Utilities and Transportation Commission on June 1, 2018.

In a review with Washington Utilities and Transportation Commission staff, it was discovered that the company inadvertently used an outdated number for projected average retail sales in the original report. The company is providing revised versions of the following documents to correct that error:

1. Confidential and Redacted versions of the 2018 RPS Report—The revised versions provide an updated Table 1, Table 2, and Table 7 to correct the average retail sales, which also impacted renewable target numbers as well. The commerce renewable report embedded into pages 7 through 9 are also corrected to reflect the same changes.
2. Confidential and Redacted Attachment A—The RPS Reporting Tool was corrected to reflect the correct average retail sales, renewable target, and allocate additional renewable energy credits from the company's Top of the World resource to meet the corrected renewable target.

As a result of further guidance from staff, Pacific Power is providing updated versions of the following documents in support of the report:

1. Confidential 2018 RPS Cost Analysis
2. Confidential 2018 RPS Incremental Cost Analysis
3. An excel version of the 2018 Renewable Report to Commerce

Pacific Power 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, Pacific Power requests

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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)(c).

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

Sincerely,

_____/s/
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Enclosures:

180500-PPL-RPS-Rpt-r-7-5-18 (C).pdf
180500-PPL-RPS-Rpt-r-7-5-18 (R).pdf
180500-PPL-RPS-Rpt-Attach-A-r-7-5-18 (C).pdf
180500-PPL-RPS-Rpt-Attach-A-r-7-5-18 (R).pdf
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