

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER
& LIGHT COMPANY,

Renewable Energy Target Progress
Report under RCW 19.285.070 and
WAC 480-109-210

DOCKET UE-210345

ORDER 01

APPROVING COMPLIANCE WITH
ELIGIBLE RENEWABLE ENERGY
TARGET REPORTING
REQUIREMENTS FOR 2021

BACKGROUND

- 1 The Energy Independence Act (EIA or Act)¹ requires qualifying electric utilities to obtain certain percentages of their electricity from eligible renewable resources. The Washington Utilities and Transportation Commission (Commission) enforces compliance with the EIA by investor-owned utilities.² Ultimately, the Commission must determine “whether the utility has generated, acquired or arranged to acquire enough renewable energy credits or qualifying generation to comply with its renewable resource target.”³
- 2 The Commission has implemented these requirements by establishing a two-step compliance process.⁴ Because a utility may comply with its renewable portfolio standards (RPS) obligation by using renewable energy credits (RECs) acquired in the year after the target year, ultimate compliance for 2021, for example, may be demonstrated as late as June 1, 2023. Accordingly, there will be two Commission decisions for each year’s compliance: (1) a determination that the Company has enough resources to meet the 15 percent target; and (2) the retrospective compliance decision.

¹ Chapter 19.285 RCW.

² RCW 19.285.060(6).

³ WAC 480-109-210(3)(b).

⁴ WAC 480-109-210(1) and (6).

3 The filing before the Commission is the initial resource-adequacy filing made by
PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) for its 2021
obligation. The Commission will consider PacifiCorp’s compliance with its 2021 target
when PacifiCorp requests such a finding. Consistent with the requirements of WAC 480-
109-210(6), the Company must make this request through a filing in this docket no later
than June 1, 2023.

4 On May 17, 2021, PacifiCorp filed a Petition for Waiver of WAC 480-109-210(2)(a)(i)
(Petition). WAC 480-109-210(2)(a)(i) requires a utility 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. PacifiCorp requests an exemption that
would allow the Company to provide an updated incremental cost calculation for certain
repowered resources included in its 2021 RPS Report and to use the capacity value as
calculated in the 2019 IRP progress report filed on October 18, 2019. The Company notes
that the current Commission rule, as written, does not address the repowering of
renewable resources.

5 On June 1, 2021, PacifiCorp filed with the Commission its 2021 Annual Renewable
Portfolio Standard Report (RPS Report), which identified a 2021 target of 615,731
megawatt-hours (MWh). Table 1, below, summarizes PacifiCorp’s 2021 target and the
total amount of resources that the Company had acquired by January 1, 2021:

Table 1: PacifiCorp’s 2021 Renewable Resource Target and Compliance Plan

2021 Target (MWh)	Incremental Hydro (MWh)	Wind (MWh)	Geothermal (MWh)	Solar (MWh)	2021 Eligible Renewable Resources (MWh)
615,731	1,858	459,326	23,852	130,695	963,681

6 PacifiCorp seeks an order from the Commission confirming that the Company has
complied with the Commission’s EIA reporting requirements and accepting the
Company’s calculations and eligibility of the renewable resources identified in the RPS
Report for 2021.

7 On June 8, 2021, the Commission issued a Notice inviting interested persons to file
written comments on PacifiCorp’s RPS Report. During the comment period, the

Commission received written comments from Commission staff (Staff). No public comments were submitted.

8 Based on the information that the Company provided in its RPS Report and supplemental filing, Staff believes that PacifiCorp correctly calculated its 2021 RPS target, and that it has acquired sufficient resources to meet that target.

9 Commission rules require the Company to document its use of renewable resources under various renewable energy programs in its annual report. This information needs to be updated for final compliance, and Staff asks the Commission to require PacifiCorp to make such updates, including listing details about program usage in the final 2021 compliance report to allow Staff to determine whether its resources meet EIA requirements.

10 Staff recommends that the Commission issue an order in this docket determining that:

- (1) The 2021 renewable energy target for PacifiCorp is 615,731 MWh.
- (2) PacifiCorp has demonstrated that, by January 1, 2021, it acquired 615,731 megawatt-hours of eligible renewable resources sufficient to supply 15 percent of its load for 2021.
- (3) PacifiCorp has complied with the June 1, 2021, reporting requirements pursuant to WAC 480-109-210.
- (4) Bigfork; Blundell; Blundell II; Cedar Springs Wind I; Cedar Springs Wind II; Cedar Springs Wind III; Ekola Flats Wind; Foote Creek I; Glenrock III; Latigo Wind; McFadden Ridge; Mountain Wind 1; Mountain Wind 2; Pavant Solar II LLC; Pioneer Wind Park I LLC; Rock River I; Sage Solar I, LLC; Sage Solar II, LLC; Sage Solar III, LLC; Sweetwater Solar, LLC; TB Flats I; TB Flats II; Wolverine Creek are eligible renewable facilities for RPS compliance.
- (5) PacifiCorp is granted permission to adjust its one-time incremental cost calculation as the company has requested in its Petition.

DISCUSSION

11 The Commission accepts PacifiCorp's calculation of 615,731 MWh as the Company's renewable energy target for 2021 and determines that PacifiCorp has identified sufficient resources to be able to meet that target. The Commission will make its final

determination about whether PacifiCorp has met its 2021 target when the Company requests such a finding, no later than June 1, 2023. To assist Staff with determining whether PacifiCorp's resources meet EIA eligibility requirements, PacifiCorp must provide details about which certificates were used for its various renewable energy programs, as required by WAC 480-109-210(2)(d)(i), in its final compliance report for 2021.

12 Furthermore, the Commission grants PacifiCorp's Petition for an exemption from WAC 480-109-210(2)(a)(i). Pursuant to WAC 480-07-110, the Commission may, in response to a request or on its own motion, grant an exemption from its own rules when "consistent with the public interest, the purposes underlying regulation, and applicable statutes."⁵ PacifiCorp's request to use an updated incremental cost calculation and updated capacity value for certain repowered resources is reasonable and consistent with the public interest.

FINDINGS AND CONCLUSIONS

- 13 (1) The Commission is an agency of the State of Washington vested by statute with the authority to regulate the rates, rules, regulations, practices, accounts, securities, transfers of property and affiliated interests of public service companies, including electric companies.
- 14 (2) PacifiCorp is an electric company and a public service company subject to Commission jurisdiction.
- 15 (3) PacifiCorp serves more than 25,000 customers within the State of Washington and is a "qualifying utility" within the meaning of RCW 19.285.030(19).
- 16 (4) PacifiCorp has properly calculated its renewable energy target for 2021 to be 615,731 MWh.
- 17 (5) By January 1, 2021, PacifiCorp had acquired sufficient eligible renewable resources to supply at least 15 percent of its load for the remainder of 2021.

⁵ Accord WAC 480-109-030.

- 18 (6) PacifiCorp has met the reporting requirements of RCW 19.285.070 and WAC 480-109-210. These reporting requirements include PacifiCorp's plan for meeting its RPS obligation for the remainder of 2021.
- 19 (7) Pursuant to WAC 480-109-210(4), PacifiCorp must provide a summary of its RPS Report to its customers, by bill inset or other suitable method, within 30 days of the date of this Order.
- 20 (8) Pursuant to WAC 480-109-210(6), PacifiCorp must file a report no later than June 1, 2023, that lists certificate numbers in Western Renewable Energy Generation Information System for every megawatt-hour and renewable energy credit that PacifiCorp retired to meet the January 1, 2021 target.
- 21 (9) This matter came before the Commission at its regularly scheduled meeting on August 12, 2021.
- 22 (10) After reviewing PacifiCorp's Petition and RPS Report and giving due consideration to all relevant matters and for good cause shown, the Commission accepts PacifiCorp's calculation of 615,731 MWh as the Company's renewable energy target for 2020 and adopts Staff's recommendations as set forth in paragraph 10 of this Order.

ORDER

THE COMMISSION ORDERS:

- 23 (1) The Commission accepts the calculation of 615,731 MWh as the 2021 renewable energy target for PacifiCorp d/b/a Pacific Power & Light Company.
- 24 (2) PacifiCorp d/b/a Pacific Power & Light Company has identified eligible renewable resources sufficient to supply at least 15 percent of its load for 2021.
- 25 (3) PacifiCorp d/b/a Pacific Power & Light Company has complied with the June 1, 2021, reporting requirements pursuant to WAC 480-109-210.
- 26 (4) Bigfork; Blundell; Blundell II; Cedar Springs Wind I; Cedar Springs Wind II; Cedar Springs Wind III; Ekola Flats Wind; Foote Creek I; Glenrock III; Latigo Wind; McFadden Ridge; Mountain Wind 1; Mountain Wind 2; Pavant Solar II LLC; Pioneer Wind Park I LLC; Rock River I; Sage Solar I, LLC; Sage Solar II, LLC; Sage Solar III, LLC; Sweetwater Solar, LLC; TB Flats I; TB Flats II; Wolverine Creek are eligible renewable facilities for RPS compliance

- 27 (5) PacifiCorp d/b/a Pacific Power & Light Company is granted permission to adjust its one-time incremental cost calculation as the company has requested in its Petition.
- 28 (6) PacifiCorp d/b/a Pacific Power & Light Company's final compliance report must list certificate numbers for every renewable energy credit that PacifiCorp d/b/a Pacific Power & Light Company retired in the Western Renewable Energy Generation Information System and details about which certificates were used for its voluntary renewable energy programs in 2021.
- 29 (7) The Commission Secretary is authorized to accept or approve a filing that complies with the requirements of this Order.

Dated at Lacey, Washington, and effective August 12, 2021.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chair

ANN E. RENDAHL, Commissioner

JAY M. BALASBAS, Commissioner