



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
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July 27, 2018

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

RE: Pacific Power & Light Annual Renewable Portfolio Standard Compliance Report
Docket UE-160777

Dear Mr. Johnson:

In Order 01 of the above mentioned docket, the Commission determined that Pacific Power and Light (Pacific Power or Company) had complied with the 2016 renewable portfolio standard (RPS) target calculation and reporting requirements. The Commission ordered Pacific Power to file a report no later than June 1, 2018, that listed the certificate numbers for every renewable energy credit (REC) that the Company retired in the Western Renewable Energy Generation Information System (WREGIS), along with details about which certificates were used for its voluntary renewable energy programs for 2016.

Staff Analysis of Pacific Power's 2016 Final RPS Compliance Report

In its July 27, 2016, revised filing, Pacific Power correctly calculated its 2016 RPS target of 370,166 MWh, and identified a mix of wind- and incremental hydro-based RECs from 2015 and 2016 that it planned to use to meet this target. Table 1 below displays the mix of resources that Pacific Power planned to deploy to meet the target.

Table 1: Pacific Power's 2016 Renewable Resource Target and Compliance Plan

2016 Target (MWh)	Incremental Hydro (MWh)	2015 Generation and RECs	2016 Generation and RECs	Total Compliance Resources (MWh)
370,166	1,903	215,961	152,302	370,166

On May 29, 2018, Pacific Power filed its final RPS compliance report for 2016. Commission staff (Staff) has reviewed the compliance report and determined that Pacific Power has met its 2016 RPS target. Table 2 below details the resources Pacific Power used to meet the target.

Table 2: Summary of 2016 Pacific Power RCW 19.285.040 Compliance

Facility Name	Facility Type	Vintage Year 2015	Vintage Year 2016	Total
Pavant	Solar	316		316
Goodnoe Hills	Wind	5,383	18,292	23,675
Leaning Juniper I	Wind	15,187	16,552	31,739
Marengo	Wind	24,062	29,087	53,149
Marengo II	Wind	11,102	13,918	25,020
Campbell Hill	Wind	23,680	27,276	50,956
Dunlap I	Wind	27,359	31,741	59,100
Glenrock I	Wind	23,306	11,571	34,877
Rolling Hills	Wind	5,468		5,468
Top of the World	Wind	45,911		45,911
Bennett Creek Wind Farm	Wind	8,656		8,656
Hot Springs Wind Farm	Wind	8,028		8,028
Nine Canyon Wind Project	Wind	2,500		2,500
Lower Snake River – Phalen Gulch	Wind	1,300		1,300
Elkhorn Valley Wind Farm	Wind	4,468		4,468
Fighting Creek LFGTE Plant	Biogas	730		730
Hidden Hollow Energy	Biogas	12,501		12,501
JC Boyle	Incremental Hydro		235	235
Lemolo 1	Incremental Hydro		1,113	1,113
Lemolo 2	Incremental Hydro		95	95
Prospect 2	Incremental Hydro		329	329
TOTAL		219,957	150,209	370,166

As part of its 2016 RPS compliance, Pacific Power has retired unbundled RECs purchased from a variety of plants. A portion of these RECs (20,515) were produced from solar, wind, and biogas facilities located either in the Pacific Northwest or in another state in which Pacific Power serves retail customers: Pavant, Nine Canyon, Fighting Creek, Hidden Hollow, and Elkhorn Valley. The Department of Commerce has determined that three of these facilities (Nine Canyon,

Fighting Creek, and Elkhorn Valley) are eligible renewable resources, and has marked them as eligible in WREGIS. Pavant—a solar facility in Utah—and Hidden Hollow—a biogas plant in Idaho—are registered as renewable resources in WREGIS, though the Department of Commerce has not marked them as eligible to use for RPS compliance in Washington.

Staff has reviewed information on these plants, believes they meet the requirements as eligible renewable resources under the EIA, and recommends the Commission approve Pacific Power's use of RECs acquired from them to fulfill its RPS compliance obligations.

Conclusion

For 2016, Pacific Power has fully complied with the reporting requirements contained in Order 01, entered August 12, 2016. The Commission should approve the eligibility of Pavant, Nine Canyon, Fighting Creek, Hidden Hollow, and Elkhorn Valley and the use of RECs acquired from these resources for RPS compliance.

Sincerely,

Andrew Rector
Regulatory Analyst