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UTILITIES AND TRANSPORTATION COMMISSION

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July 9, 2019

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, Washington 98504-7250

RE: Pacific Power & Light Company's Annual Renewable Portfolio Standard Compliance Report
Docket UE-170694

Dear Mr. Johnson:

In Order 01 of the above mentioned docket, the Commission determined that Pacific Power & Light (Pacific Power or Company) had complied with the 2017 renewable portfolio standard (RPS) target calculation and initial reporting requirements. The Commission ordered Pacific Power to file a report no later than June 1, 2019, 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 2017.

Staff Analysis of Pacific Power's 2017 Final RPS Compliance Report

In its August 4, 2017, revised filing, Pacific Power correctly calculated its 2017 RPS target of 364,047 MWh, and identified a mix of wind-, solar-, landfill gas-, and incremental hydro-based RECs from 2016 and 2017 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 2017 Renewable Resource Target and Compliance Plan

2017 Target (MWh)	Incremental Hydro (MWh)	2016 Generation and RECs	2017 Generation and RECs	Total Compliance Resources (MWh)
364,047	1,832	223,775	138,440	364,047

On May 31, 2019, Pacific Power filed its final RPS compliance report for 2017. Commission staff (Staff) has reviewed the compliance report and determined that Pacific Power has met its 2017 RPS target. Table 2 below details the resources Pacific Power used to meet the target.

Table 2: Summary of 2017 Pacific Power RCW 19.285.040 Compliance

Facility Name	Facility Type	Vintage Year 2016	Vintage Year 2017	Total
Pavant	Solar	25,003		25,003
Enterprise	Solar	19,234		19,234
Goodnoe Hills	Wind		15,514	15,514
Leaning Juniper I	Wind		12,585	12,585
Marengo	Wind		25,507	25,507
Marengo II	Wind		12,396	12,396
Dunlap I	Wind		899	899
Glenrock I	Wind	13,886	21,686	35,572
Top of the World	Wind	53,189	49,434	102,623
Seven Mil Hill I	Wind	4,353		4,353
Bennett Creek Wind Farm	Wind	11,174		11,174
Condon Phase II	Wind	7,725		7,725
Condon Wind Power Project	Wind	8,286		8,286
Klondike I	Wind	8,543		8,543
Meadow Creek – Five Pine	Wind	29,719		29,719
Meadow Creek – North Point	Wind	2,644		2,644
Nine Canyon Wind Project	Wind	8,225		8,225
Nine Canyon Phase 3 Wind	Wind	4,668		4,668
Stateline – FPL Energy Vansycle	Wind	12,946		12,946
Hot Springs Windfarm	Wind	10,218		10,218
Hidden Hollow Energy	Biogas	3,960		3,960
JC Boyle	Incremental Hydro		342	342
Lemolo 1	Incremental Hydro		1,438	1,438
Lemolo 2	Incremental Hydro		127	127
Prospect 2	Incremental Hydro		346	346
TOTAL		223,773	140,274	364,047

As part of its 2017 RPS compliance, Pacific Power has retired unbundled RECs purchased from a variety of plants. A portion of these RECs (32,363) were purchased from the Meadow Creek wind facility located Idaho. Meadow Creek is registered as a renewable resource in WREGIS,

though the Department of Commerce has not marked it as eligible to use for RPS compliance in Washington.

Staff has reviewed information on Meadow Creek, believes it meets the requirements as an eligible renewable resource under the EIA, and recommends the Commission approve Pacific Power's use of RECs acquired from it to fulfill its RPS compliance obligations.

Conclusion

For 2017, Pacific Power has fully complied with the reporting requirements contained in Order 01, entered August 10, 2017.

Sincerely,

Andrew Rector
Regulatory Analyst