

June 1, 2017

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UM ____ - PacifiCorp's Renewable Portfolio Standard Oregon Compliance Report for 2016 and Motion for Protective Order

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits for filing its Renewable Portfolio Standard Oregon Compliance Report for 2016 in accordance with ORS 469A.170 and OAR 860-083-0350. Attachments A-D are confidential and provided under separate cover. Confidential information in this filing is provided in accordance with OAR 860-001-0070.

This filing also includes a motion for a standard protective order in this matter.

PacifiCorp respectfully requests that all communications related to this filing be addressed to:

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Erin.apperson@pacificorp.com

Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com.

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


Public Utility Commission of Oregon

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Informal inquiries may be directed to Natasha Siores at (503) 813-6583.

Sincerely,



Etta Lockey
Vice President, Regulation

Enclosures

cc: UM 1782 Service List

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Renewable Portfolio Standard Oregon Compliance Report for 2016 and Motion for Protective Order on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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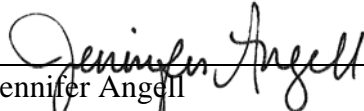
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Dated this 1st day of June, 2017



Jennifer Angell
Supervisor, Regulatory Operations



Low Impact Hydro - North Umpqua



Solar - Black Cap



Wind - Goodnoe Hills

PacifiCorp

Oregon Renewable Portfolio Standard Compliance Report 2016

June 1, 2017

**PacifiCorp
Renewable Portfolio Standard
Oregon Compliance Report
2016**

Introduction

As required by ORS 469A.170 and OAR 860-083-0350, PacifiCorp, d/b/a Pacific Power (PacifiCorp or the Company), respectfully submits this 2016 Oregon Renewable Portfolio Standard Compliance Report (2016 RPS Compliance Report) to the Public Utility Commission of Oregon (Commission), to meet the requirements of Oregon's renewable portfolio standard (RPS). This report was prepared with the standardized form adopted by Order No. 11-440 in Docket UM 1467 on November 9, 2011.

Summary

This 2016 RPS Compliance Report shows that the Company met the 2016 Oregon RPS target with a combination of 1,930,346 banked bundled and unbundled renewable energy certificates (RECs). The Company used bundled RECs with a vintage of 2016 and unbundled RECs with a vintage of 2014 and 2015, from generating facilities certified by the Oregon Department of Energy (ODOE) as Oregon RPS-eligible. The generating facilities, either owned by the Company or under contract, are registered in the Western Renewable Energy Generation Information System (WREGIS) and the WREGIS certificates are reported in this 2016 RPS Compliance Report.

In accordance with ORS 469A.170(2)(e), through 2012, PacifiCorp added cost effective renewable resources to its generation portfolio. In addition, as required by ORS 757.365 and OAR 860-084-0020(2), the Company included renewable resources associated with the Oregon Solar Incentive Program for RPS compliance.

In April 2016, PacifiCorp issued a request for proposals (RFP) to market seeking both cost-effective renewables and RECs that could be used to meet the state RPS requirements in California, Oregon, and Washington. With the extension and phasing out of federal tax incentives for renewables, the Company initiated a timely RFP to evaluate the potential customer benefits from acquiring renewable resources and/or RECs in the near-term. After careful evaluation of both the resource and REC bids received, the Company opted to pursue a REC purchase strategy, which was the least-cost, least-risk procurement option. REC costs associated with this purchase are accounted for and deferred in accordance with Commission Order No. 17-019 in Docket UE 313.

The Company has calculated the incremental costs for the RECs that will be used for the 2016 compliance requirement and the total cost of RECs for 2007 through 2016. The incremental costs associated with the renewable resources used for 2016 RPS compliance are consistent with the Company's 2017-2021 RPS Implementation Plan (RPIP) filed on July 15, 2016. The new resources added in the 2016 RPS Compliance Report do not exceed the threshold requiring

recalculation of incremental costs per OAR 860-083-0100(13)(a) and (b). Consistent with the July RPIP, using the methodology established by the Commission’s rules, the Company’s incremental costs for compliance year 2016 do not trigger the four percent cost limit under ORS 469A.100.

ORS 757.370(1) previously required that by January 1, 2020, the total solar photovoltaic generating nameplate capacity of all electric companies in Oregon be at least 20 MW_{AC}, of which PacifiCorp was to acquire 8.7 MW_{AC}. To date, PacifiCorp has acquired 7 MW_{AC} of solar to meet the requirement.¹ However, SB 1547 eliminated the solar capacity standard set forth by ORS 757.370(1).

In accordance with ORS 469.170(2)(d) and (f)², the Company uses its Integrated Resource Plan (IRP) to determine the preferred resources to meet the Company’s needs over the long-term planning horizon considering cost, risk, and planning uncertainty. Included in the IRP are forecasts of the expected retail customers and retail loads, alternative load forecast scenarios, and detailed production cost modeling that captures the impact of random fluctuations in loads. In addition, the Company conducts resource portfolio analysis based on different RPS scenarios over the long-term planning horizon. More information on the resource additions and the Oregon RPS long-term compliance forecast in the Company’s 2015 IRP, 2015 IRP Update, and 2017 IRP can be found at: <http://www.pacificorp.com/es/irp.html>.

2016 RPS Compliance Report

The following information is provided in response to the requirements of OAR 860-083-0350.

OAR 860-083-0350(2)(a)
The total number of megawatt-hours sold to retail electricity consumers covered by ORS 469A.052 by the electric company or sold in the service areas of each electric company covered by ORS 469A.052 by the electricity service supplier.

Response:

A total of 12,868,974 megawatt-hours were sold to Oregon retail consumers in 2016.

OAR 860-083-0350(2)(b)
The total number of renewable energy certificates, identified as either unbundled or bundled certificates, acquired in the compliance year and used to meet the renewable portfolio standard.

¹ In October 2012, the Company acquired the Black Cap Solar project (Black Cap) in Lakeview, Oregon and in April 2016, the 5.0 MW_{AC} Old Mill Solar project (Old Mill) located in Bly, Oregon, became operational. RECs generated through Black Cap earn double credit towards PacifiCorp’s RPS compliance.

² ORS 469.170(2)(d) Whether the actions taken by the company or supplier are contributing to long term development of generating capacity using renewable energy sources; ORS 469.170(2)(f) Good faith forecasting differences associated with the projected number of retail electricity consumers served and the availability of electricity from renewable energy sources.

Response:

A total of 10,251 unbundled certificates were acquired in and used to meet the renewable portfolio standard in compliance year 2016. A total of 1,685,228 bundled certificates were acquired in the compliance year to meet the renewable portfolio standard requirement for compliance year 2016.³

OAR 860-083-0350(2)(c)
The total number of renewable energy certificates, identified as either unbundled or bundled certificates, acquired on or before March 31 of the year following the compliance year and used to meet the renewable portfolio standard.

Response:

There are no bundled or unbundled certificates acquired on or between January 1, 2017 and March 31, 2017 that are used to meet the renewable portfolio standard for compliance year 2016.

OAR 860-083-0350(2)(d)
The total number and cost of unbundled renewable energy certificates, identified as either banked or non-banked certificates, used to meet the renewable portfolio standard.

Response:

Compliance Year	Number of Unbundled RECs
2012	127,788
2013	130,899
2014	129,587
2015	211,726
2016	245,118

For cost and detail by facility, see Confidential Attachment A.

OAR 860-083-0350(2)(e)
The total number of banked bundled renewable energy certificates that were used to meet the renewable portfolio standard.

Response:

The total number of banked bundled RECs used to meet the renewable portfolio standard for compliance year 2016 is 1,685,228.

For detail by facility, see Confidential Attachment A.

³ Includes 28,471 RECs transferred from the Energy Trust of Oregon.

OAR 860-083-0350(2)(f)

The total number of renewable energy certificates, identified as either bundled or unbundled certificates, issued in the compliance year that were banked to serve Oregon electricity consumers.

Response:

As of this filing, there are no bundled certificates issued in the compliance year 2016 that are banked for the RPS requirement for Oregon.

As of this filing, there are 818 bundled certificates issued in compliance year 2016 that were transferred from the Energy Trust of Oregon (ETO) to PacifiCorp and banked for the RPS requirement for Oregon.

As of this filing, there are no unbundled certificates issued in compliance year 2016 that are banked for the RPS requirement for Oregon.

For detail by facility, see Confidential Attachments A and D.

OAR 860-083-0350(2)(g)

For electric companies, unless otherwise provided under subsection (2)(k) of this rule, the total number of renewable energy certificates included in the rates of Oregon retail electricity consumers that were sold since the last compliance report, including:
(A) The names of the associated generating facilities; and
(B) For each facility, the year or years the renewable energy certificates were issued.

Generating Facility Name	Year(s) RECs Issued
NA	NA

Response:

The Company is a multi-state utility that allocates a portion of its renewable resources based on a state allocation process. Oregon's share of RECs is banked for RPS compliance; however, not all RECs meet the Oregon RPS qualifications. While the Company acknowledges that it does sell RECs generated by Oregon eligible resources, these REC sales are not Oregon-allocated RECs; they are RECs allocated to other state jurisdictions. Therefore, no Oregon RPS-compliant RECs included in the rates of Oregon retail electricity consumers were sold during the compliance year.

OAR 860-083-0350(2)(h)

Unless otherwise provided under subsection (2)(k) of this rule, for each generating facility associated with the renewable energy certificates included in subsections (2)(b), (c), (f), or (g) of this rule the following information:

- (A) The name of the facility;
- (B) The county and state where the facility is located;
- (C) The type of renewable resource;
- (D) The total nameplate megawatt capacity of the facility;
- (E) For an electric company, the Oregon share of the nameplate megawatt capacity of the facility;
- (F) The year of the first delivery of qualifying electricity or the first year of the contract for the purchase of unbundled renewable energy certificates; and
- (G) The duration of the contract or the amortization period of a facility owned by the electric company or the planned lifetime of a facility owned by the electricity service supplier.

Response:

Please see the tables below. Table 2 lists the generating facilities associated with bundled renewable energy certificates and Table 3 lists the generating facilities associated with unbundled renewable energy certificates. These tables include projects that have reached commercial operation, have received certification for RPS-eligibility through the Oregon Department of Energy, and those pending RPS certification.

Table 2 – Bundled RECs

Energy Source	Generating Facility	Resource Type ⁴	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Biogas	Hill Air Force Base	QF	Davis	UT	2005	20 years	2.457	See Comment and Table 4 Below
Geothermal	Blundell II	Utility Owned	Beaver	UT	2007	Not Applicable	12	
Wind	Campbell Hill-Three Buttes	PPA	Converse	WY	2009	20 years	99	
	Chevron Casper Wind ⁵	QF	Natrona	WY	2009	5 years	16.5	
	Combine Hills	PPA	Umatilla	OR	2003	20 years	41	
	Dunlap I	Utility Owned	Carbon	WY	2010	Not Applicable	111	
	Foote Creek I ⁶	Utility Owned	Carbon	WY	1999	Not Applicable	40.8	
	Foote Creek II	QF	Carbon	WY	2014	5 years	1.80	
	Foote Creek III	QF	Carbon	WY	2014	5 years	24.50	
	Glenrock I	Utility Owned	Converse	WY	2008	Not Applicable	99	
	Glenrock III	Utility Owned	Converse	WY	2009	Not Applicable	39	
	Goodnoe Hills	Utility Owned	Klickitat	WA	2008	Not Applicable	94	
	High Plains	Utility Owned	Albany & Carbon	WY	2009	Not Applicable	99	
	Latigo	PPA	San Juan	UT	2016	20 years	60	
	Leaning Juniper I	Utility Owned	Gilliam	OR	2006	Not Applicable	100.5	
	Marengo	Utility Owned	Columbia	WA	2007	Not Applicable	140.4	
	Marengo II	Utility Owned	Columbia	WA	2008	Not Applicable	70.2	
	McFadden Ridge	Utility Owned	Albany & Carbon	WY	2009	Not Applicable	28.5	
	Mountain Wind Power	QF	Uinta	WY	2008	25 years	60.9	
	Mountain Wind Power II	QF	Uinta	WY	2008	25 years	79.8	
Rock River I	PPA	Carbon	WY	2001	20 years	50		
Seven Mile Hill I	Utility Owned	Carbon	WY	2008	Not Applicable	99		
Seven Mile Hill II	Utility Owned	Carbon	WY	2008	Not Applicable	19.5		
Top of the World	PPA	Converse	WY	2010	20 years	200.2		
Wolverine Creek	PPA	Bonneville	ID	2005	20 years	64.5		

⁴ QF = Qualifying Facility
 PPA = Power Purchase Agreement
 SVP = Solar Volumetric Project
 ETO = Energy Trust of Oregon Funded Project

⁵ Chevron Casper Wind is currently under a short-term QF PPA while a longer term agreement is being negotiated.

⁶ Foote Creek I is jointly owned with the Eugene Water & Electric Board (EWEB). PacifiCorp owns nearly 79 percent—about 32.2 MW, and EWEB owns the remainder.

Table 2 – Bundled RECs

Energy Source	Generating Facility	Resource Type ⁴	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Hydro-Low Impact	Ashton	Utility Owned	Fremont	ID	1917	Not Applicable	6.8	See Comment and Table 4 Below
	Clearwater 1	Utility Owned	Douglas	OR	1953		15	
	Clearwater 2	Utility Owned	Douglas	OR	1953		26	
	Cutler	Utility Owned	Box Elder	UT	1927		30	
	Fish Creek	Utility Owned	Douglas	OR	1952		11	
	Oneida	Utility Owned	Franklin	ID	1915		30	
	Prospect 3	Utility Owned	Jackson	OR	1932		7.7	
	Slide Creek	Utility Owned	Douglas	OR	1951		18	
	Soda	Utility Owned	Caribou	ID	1924		14	
	Soda Springs	Utility Owned	Douglas	OR	1952		11	
	Grace	Utility Owned	Caribou	ID	1923		33	
	Lemolo 1	Utility Owned	Douglas	OR	1955		32	
	Lemolo 2	Utility Owned	Douglas	OR	1956		38.5	
	Toketee	Utility Owned	Douglas	OR	1950		42.6	
Hydro - Incremental	Big Fork	Utility Owned	Flathead	MT	1929	Not Applicable	Not Applicable	See Comment and Table 4 Below
	Copco 1	Utility Owned	Siskiyou	CA	1918			
	Cutler	Utility Owned	Box Elder	UT	1927			
	JC Boyle	Utility Owned	Klamath	OR	1958			
	Lemolo 1	Utility Owned	Douglas	OR	1955			
	Lemolo 2	Utility Owned	Douglas	OR	1956			
	Oneida	Utility Owned	Franklin	ID	1915			
	Pioneer	Utility Owned	Weber	UT	1897			
	Prospect 2	Utility Owned	Jackson	OR	1928			
	Prospect 3	Utility Owned	Jackson	OR	1932			
	Yale	Utility Owned	Cowlitz	WA	1953			
Solar	Central Oregon (CO 1)	SVP	Jefferson, Deschutes, Crook	OR	2010	15 Years	.209 _{AC}	
	Eastern Oregon (EO 1)	SVP	Umatilla, Wallowa	OR	2010		.211 _{AC}	
	Portland Oregon (PO 1)	SVP	Multnomah, Clatsop	OR	2010		.249 _{AC}	
	Willamette Valley (WV 1)	SVP	Marion, Benton, Linn, Lane, Polk	OR	2010		.227 _{AC}	
	Southern Oregon (SO 1)	SVP	Jackson, Josephine, Klamath, Coos	OR	2010		.250 _{AC}	
	Southern Oregon (SO 2)	SVP	Jackson, Josephine, Klamath, Coos	OR	2011		.265 _{AC}	
	Central Oregon (CO 2)	SVP	Deschutes, Crook, Jefferson	OR	2011		.243 _{AC}	
	Southern Oregon (SO 3)	SVP	Klamath, Lake, Jackson	OR	2011		.243 _{AC}	
	Willamette Valley (WV 2)	SVP	Benton, Linn, Polk, Lane, Marion	OR	2011		.243 _{AC}	

Table 2 – Bundled RECs

Energy Source	Generating Facility	Resource Type ⁴	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
	Columbia River (CR 1)	SVP	Hood River, Morrow, Mosier	OR	2011		.214 _{AC}	100%
	Joseph Community Solar	SVP	Wasco, Sherman Wallowa	OR	2011		.425 _{AC}	
	Eastern Oregon (EO2)	SVP	Umatilla, Wallowa	OR	2011		.167 _{AC}	
	Southern Oregon (SO4)	SVP	Josephine, Klamath, Jackson	OR	2012		.248 _{AC}	
	Southern Oregon (SO5)	SVP	Klamath, Jackson, Lincoln	OR	2012		.248 _{AC}	
	Willamette Valley (WV 3)	SVP	Linn, Marion, Benton, Polk	OR	2012		.247 _{AC}	
	Lakeview	SVP	Lake	OR	2012		.363 _{AC}	
	Solwatt	SVP	Umatilla	OR	2012		.307 _{AC}	
	Lakeview II	SVP	Lake	OR	2013		.421 _{AC}	
	Southern Oregon (SO 6)	SVP	Klamath, Jackson, Josephine, Douglas	OR	2013		.245 _{AC}	
	Southern Oregon (SO 7)	SVP	Klamath, Jackson, Coos	OR	2013		.250 _{AC}	
	Willamette Valley (WV 4)	SVP	Benton, Linn	OR	2013		.251 _{AC}	
	Willamette Valley (WV 5)	SVP	Linn, Marion, Benton, Polk	OR	2013		.251 _{AC}	
	Willamette Valley (WV 6)	SVP	Linn, Marion, Benton, Polk	OR	2013		.251 _{AC}	
	Crook County	SVP	Crook	OR	2013		.411 _{AC}	
	Southern Oregon (SO 8)	SVP	Klamath, Jackson, Josephine	OR	2013		.221 _{AC}	
	Southern Oregon (SO 9)	SVP	Jackson	OR	2013		.061 _{AC}	
	Portland Oregon (PO 2)	SVP	Multnomah, Clatsop	OR	2013		.121 _{AC}	
	Central Oregon (CO3)	SVP	Deschutes, Jefferson, Crook	OR	2013		.201 _{AC}	
	Willamette Valley (WV 7)	SVP	Marion, Benton, Linn, Polk	OR	2014		.007 _{AC}	
	Solwatt II	SVP	Umatilla	OR	2014		.168 _{AC}	
	Powell Butte Solar	SVP	Crook	OR	2014		.164 _{AC}	
	Southern Oregon (SO 10)	SVP	Klamath, Josephine, Douglas, Jackson	OR	2014		.249 _{AC}	
	Southern Oregon (SO 11)	SVP	Klamath, Josephine, Jackson	OR	2014		.212 _{AC}	
	Columbia River (CR 2)	SVP	Wasco	OR	2014		.009 _{AC}	
	CTWS (Tribes W. Springs)	SVP	Jefferson	OR	2014		.254 _{AC}	
	Bourdet 5713351	SVP	Klamath	OR	2014		.084 _{AC}	
	Willamette Valley (WV 8)	SVP	Linn, Polk	OR	2015		.203 _{AC}	
	Willamette Valley (WV 9)	SVP	Linn, Marion	OR	2015		.047 _{AC}	
	Southern Oregon (SO 12)	SVP	Klamath, Jackson	OR	2015		.245 _{AC}	
	Bourdet 5903801	SVP	Klamath	OR	2016		.084 _{AC}	
	Central Oregon (CO 4)	SVP	Deschutes	OR	2016		.034 _{AC}	
	Eastern Oregon (CO 3)	SVP	Crook, Deschutes	OR	2016		.225 _{AC}	
	Portland Oregon (PO 3)	SVP	Multnomah	OR	2016		.103 _{AC}	

Table 2 – Bundled RECs

Energy Source	Generating Facility	Resource Type ⁴	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
	Southern Oregon (SO 13) Pavant	SVP QF	Klamath Millard	OR UT	2016 2015	10 years	.009 _{AC} 9.70	SG ⁷
Solar	Black Cap**	Utility Owned	Lake	OR	2012	16 Years	2.0 _{AC}	100%

**Indicates that facility is eligible for 2x1 REC multiplier under ORS 757.375.

Table 2 – Bundled RECs

Energy Source	Generating Facility	Resource Type ⁶	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Hydro	C Drop Hydro	ETO	Klamath	OR	2012	Not Applicable	1.1	See Comment and Table 4 Below
	COID - Siphon Power	ETO	Deschutes	OR	1989		5.4	
	FID - Copper Dam Plant	ETO	Hood River	OR	1986		3	
	COID - Juniper Ridge Hydro	ETO	Deschutes	OR	2010		5	
	FID - Peters Drive Dam	ETO	Hood River	OR	1987		1.8	
	Swalley Irrigation District	ETO	Deschutes	OR	2010		0.75	
	City of Albany Hydro	ETO	Linn	OR	2009		0.50	
Biogas	Farm Power Misty Meadow	ETO	Tillamook	OR	2013	Not Applicable	0.75	

⁷ Oregon receives its Control Area Generation West (CAGW) share of this resource. Of that share, up to the annual system generation (SG) allocation factor is treated as bundled.

Table 3 – Unbundled RECs

Energy Source	Generating Facility	Resource Type⁶	County	State	First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Biogas	Dry Creek Landfill	PPA	Jackson	OR	2013	Not Applicable	Not Applicable	Not Applicable
	AgPower Jerome	PPA	Jerome	ID	2013			
Wind	Mountain View I	PPA	Riverside	CA	2013	Not Applicable	Not Applicable	Not Applicable
	Mountain View II	PPA	Riverside	CA	2013			
	Condon	PPA	Gilliam	OR	2013			
	Foote Creek II	PPA	Carbon	WY	2013			
	Klondike I	PPA	Sherman	OR	2013			
	Stateline	PPA	Walla Walla	WA	2013			
	Kittitas Valley Wind	PPA	Kittitas	WA	2013			
	Nine Canyon Wind Project	PPA	Benton	WA	2013			
	Nine Canyon Phase 3	PPA	Benton	WA	2013			
	Elkhorn	PPA	Union	OR	2013			
	Hopkins Ridge	PPA	Columbia	WA	2013			
	Wild Horse	PPA	Kittitas	WA	2013			
	Red Mesa	PPA	Cibola	NM	2013			
Logan	PPA	Logan	CO	2016				
Hydro - Incremental	Rocky Reach Hydroelectric Project - C11	PPA	Chelan	WA	2013	Not Applicable	Not Applicable	Not Applicable
Solar	Pavant ⁸	PPA	Millard	UT	2016	Not Applicable	Not Applicable	Not Applicable

⁸ Oregon receives its Control Area Generation West (CAGW) share of this resource. Of that share, up to the annual system generation (SG) allocation factor is treated as bundled. The remainder is treated as unbundled.

Resources listed in Table 2, with the exception of those associated with the Oregon Solar Incentive Program the Black Cap Solar project and Combine Hills Wind, are system resources. Resource costs for system resources are allocated based on dynamic factors. For years 2007 through 2016, the following system generation allocation factors were used to allocate the renewable energy credits associated with the system resources:

Table 4									
2010 Protocol Allocation Method - Oregon									
System Generation Factor									
2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
27.44%	28.19%	27.49%	26.20%	25.81%	25.93%	25.20%	25.51%	25.47%	26.62%

RECs associated with Combine Hills and other ETO-funded projects are assigned to the ETO and transferred to PacifiCorp for use toward PacifiCorp’s Oregon RPS.

RECs associated with unbundled REC purchases and the costs associated with those purchases are accounted for and deferred in accordance with Commission Order No. 13-064 in docket UM 1646 and Order No. 17-019 in docket UE 313.

OAR 860-083-0350(2)(i)
The amount of alternative compliance payments the electric company or electricity service supplier elected to use or was required to use to comply with the applicable renewable portfolio standard.

Response:

The Company did not elect to use and was not required to use alternative compliance payments for compliance with the RPS.

OAR 860-083-0350(2)(j)
For an electric company, sufficient data, documentation, and other information to demonstrate that any voluntary alternative compliance payments were a reasonable compliance method.

Response:

The Company did not make any alternative compliance payments.

OAR 860-083-0350(2)(k)

Documentation of use of renewable energy certificates from the system under OAR 330-160-0020 established for compliance with the applicable renewable portfolio standard.

Response:

Confidential Attachments C identify the WREGIS certificates that PacifiCorp intends to retire to meet the RPS for compliance year 2016. Upon Commission approval of the 2016 RPS Compliance Report, the Company will retire these WREGIS certificates.

OAR 860-083-0350(2)(l)

For each electric company, a detailed explanation of any material deviations from the applicable implementation plan filed under OAR 860-083-0400, as acknowledged by the Commission.

Response:

The 2016 RPS Compliance Report is consistent with the 2017-2021 RPIP acknowledged by the Commission. There are no material deviations from the applicable implementation plan filed under OAR 860-083-0400.

OAR 860-083-0350(2)(m)

As specified in OAR 860-083-0100, the total number and cost of bundled renewable energy certificates used for compliance.

Response:

The total number of RECs used to meet the RPS for compliance year 2016 is 1,930,346.

For detail by facility and for cost, see Confidential Attachment A.

OAR 860-083-0350(2)(n)

For each electric company, its projected annual revenue requirement as calculated in OAR 860-083-0200 and its total cost of compliance.

Response:

Table 5 below shows the annual revenue requirement for 2016, per the Company's compliance filing in accordance with OAR 860-083-0200 submitted on November 16, 2015, and the Company's total cost of compliance for 2016. PacifiCorp's 2016 incremental cost as a percentage of annual revenue requirement was higher than previous years due to SB 1547's elimination of first-in, first-out retirement requirement. Particularly, in 2016, the use of higher cost RECs from the Oregon Solar incentive program and less reliance on zero-cost hydro RECs contributed to increased total incremental cost of compliance for the RPS. However, the cost of compliance for 2016 does not exceed the 4% of annual revenue requirement threshold.

Table 5			
Compliance Year	Oregon Allocated Nominal Levelized Incremental Cost (\$000s)	4% of Oregon Annual Revenue Requirement (\$000s)	% Oregon Annual Revenue Requirement Threshold
2016	\$15,394	\$50,733	1.21%

OAR 860-083-0350(2)(o)

For each electricity service supplier, its total cost of compliance, its average cost of compliance, and its cost limit as specified in OAR 860-083-0300(2), including all calculations.

Response:

Not applicable.

OAR 860-083-0350(2)(p)

For each electric company, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in ORS 469A.100(1) is reached for the compliance year.

Response:

The cost limit in ORS 469A.100 has not been reached for the 2016 compliance year.

OAR 860-083-0350(2)(q)

For each electricity service supplier, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in OAR 860-083-0300(2) is reached for the compliance year.

Response:

Not applicable.

OAR 860-083-0350(2)(r)

As specified in OAR 860-083-0100, the number and total cost of all bundled renewable energy certificates issued.

Response:

Please refer to Confidential Attachment D for the number of Oregon-allocated RECs and the total cost of the RECs for the period 2007 through 2016. The amount of RECs is subject to change if any additional renewable resources are certified with ODOE.

OAR 860-083-0350(2)(s)

As specified in OAR 860-083-0100, the number and total cost of bundled renewable energy certificates issued that are associated with new qualifying electricity since the last compliance report.

Response:

For details on number of RECs and cost information, see Confidential Attachment D. The new qualifying resources since the last compliance report are:

Table 6 – New Added Resources					
Energy Source	Generating Facility	Resource Type ⁹	County	State	Commercial Operation Year or First Year Contract
Solar	Southern Oregon (SO 12)	SVP	Klamath, Jackson	OR	2015
	Bourdet 5903801	SVP	Klamath	OR	2016
	Central Oregon (CO 4)	SVP	Deschutes	OR	2016
	Eastern Oregon (EO 3)	SVP	Crook, Deschutes	OR	2016
	Portland Oregon (PO 3)	SVP	Multnomah	OR	2016
	Southern Oregon (SO 13)	SVP	Klamath	OR	2016
	Pavant	QF	Millard	UT	2016
Wind	Latigo	PPA	San Juan	UT	2016

OAR 860-083-0350(6)

Each electric company subject to ORS 469A.052 and each electricity service supplier subject to ORS 469A.065 must post on its web site the public portion of the four most recent annual compliance reports required under this rule and provide a copy of the most recent such report to any person upon request. The public portions of the most recent compliance report must be posted within 30 days of the Commission decision in section (5) of this rule. The posting must include any Commission determinations under section (5) of this rule.

Response:

The Company will post its compliance report in accordance with this requirement, within 30 days of the Commission decision.

⁹ QF = Qualifying Facility
PPA = Power Purchase Agreement
SVP = Solar Volumetric Project
ETO = Energy Trust of Oregon Funded Project

OAR 860-083-0350(7)

Consistent with Commission orders for disclosure under OAR 860-038-0300, each electric company subject to ORS 469A.052 and each electricity service supplier subject to ORS 469A.065 must provide information about its compliance report to its customers by bill insert or other Commission-approved method. The information must be provided within 90 days of the Commission decision in section (5) of this rule or coordinated with the next available insert required under OAR 860-038-0300. The information must include the URL address for the compliance reports posted under section (6) of this rule.

Response:

The Company will provide information about its compliance report to its customers in accordance with this requirement, within 90 days of the Commission decision or coordinated with the next available bill insert as required under OAR 860-038-0300.

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2016**

Attachment A

**CONFIDENTIAL
2016 RPS Compliance
RECs and Cost Information**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2016**

Attachment B

**CONFIDENTIAL
Banked RECs – 2016 Vintage**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2016**

Attachment C

**CONFIDENTIAL
2016 RPS Compliance
WREGIS Certificates – Bundled and
Unbundled RECs**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2016**

Attachment D

**CONFIDENTIAL
Vintage 2007 – Vintage 2016
RECs and Cost Information**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2016**

Attachment E

**2016 RPS Compliance
REC Summary**

PacifiCorp
Renewable Portfolio Standard
Attachment E – Compliance REC Summary
Oregon Compliance Report – Compliance Year 2016

The bundled and unbundled RECs to be retired for PacifiCorp’s 2016 compliance year are summarized below by vintage year, fuel type, and location.

OAR 860-083-0350(2)(d); OAR 860-083-0350(2)(e)

Oregon's Allocated Renewable Energy Credits for 2016 Renewable Portfolio Standard
Aggregated Data

Bundled RECs		Vintage Year		
RESOURCE TYPE	LOCATION	2014	2015	2016
BIOGAS	UT			4,351
GEOHERMAL	UT			17,433
HYDRO - LOW IMPACT	ID, OR, UT			268,827
HYDRO - INCREMENTAL	MT, CA, UT, OR, ID, WA			11,049
SOLAR ¹	OR			27,211
WIND	ID, OR, WA, WY			1,327,886
BUNDLED TOTAL		0	0	1,656,757

Unbundled RECs		Vintage Year		
RESOURCE TYPE	LOCATION	2014	2015	2016
SOLAR	UT			10,251
WIND	CO	147,513	97,354	
UNBUNDLED TOTAL		147,513	97,354	10,251

Energy Trust RECs		Vintage Year		
RESOURCE TYPE	LOCATION	2014	2015	2016
BIOGAS	OR			1,831
HYDRO	OR			26,640
ENERGY TRUST TOTAL		0	0	28,471

TOTAL 2016 RECs	1,940,346
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¹ Includes RECs from Black Cap, which is eligible for the 2x1 Photovoltaic (PV) Multiplier for small solar under ORS 757.375. PV systems with a capacity of 500 kW to 5 MW installed within Oregon before January 1, 2016 will be credited for two kilowatt-hours (kWh) for each kWh generated, with respect to RPS compliance. For compliance year 2016, a total of 4,021 RECs from Black Cap RECs are set aside for retirement in WREGIS. However, these 4,021 RECs contribute a total of 8,042 megawatt-hours (RECs) towards the compliance year.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
2016 Renewable Portfolio Standard
Compliance Report.

**PACIFICORP’S MOTION FOR
PROTECTIVE ORDER**

Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for entry of a standard protective order in this proceeding. Good cause exists to issue a protective order to protect commercially sensitive and confidential business information related to the Company’s renewable portfolio standard (RPS) compliance position and strategies.

The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.¹ The Commission’s standard protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.² PacifiCorp expects to receive discovery requests related to this report, including requests for propriety cost data and models, commercially sensitive pricing information, confidential market analyses and business projections, or confidential information regarding contracts for the purchase or sale of

¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other confidential research, development, or commercial information”). See also *In re Investigation into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a party to trade secrets and other confidential commercial information” and “to facilitate the communication of information between litigants”).

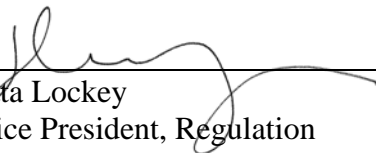
² OAR 860-001-0080(2).

electric power, power services, or fuel. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

It is also substantially likely that the parties to these proceedings will seek to discover further information held by PacifiCorp, including confidential business information. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

For these reasons, PacifiCorp respectfully requests that the Commission enter its standard protective order in this docket. The Company requests expedited consideration of this motion to allow parties who execute the protective order to obtain prompt responses to discovery requests.

Respectfully submitted this 1st day of June, 2017.



Etta Lockey
Vice President, Regulation
PacifiCorp d/b/a Pacific Power