

State of Oregon
Department of Environmental Quality

Memorandum

December 17, 2025

TO: Leah Feldon, Director

FM: Office of Greenhouse Gas Programs

RE: Proposed Order of the department's findings, as required by ORS 469A.420, for the verification of greenhouse gas emissions reductions projected in PacifiCorp's 2025 Clean Energy Plan.

Purpose For the purposes of notifying the Oregon Public Utility Commission and PacifiCorp of the findings associated with the verification of projected greenhouse gas emissions reductions forecasted in PacifiCorp's 2025 Clean Energy Plan, the Office of Greenhouse Gas Programs is requesting that the Director approve the order attached to this memorandum.

Recommendation

The Office of Greenhouse Gas Programs recommends that the Director approve the proposed order, attached to this memorandum.

Background

The reasons for this proposed order are described in the findings in the attached order.

Attachments

A. Proposed Order

Order Notifying PacifiCorp and Oregon Public Utility Commission of the Verification of Projected Emissions Reductions Forecasted in PacifiCorp's 2025 Clean Energy Plan under ORS 869A.420

BEFORE THE DIRECTOR OF THE DEPARTMENT OF ENVIRONMENTAL QUALITY

In the matter of notifying the Oregon Public Utility)	
Commission and PacifiCorp of the findings of the)	FINDINGS AND
verification of greenhouse gas emissions reductions)	ORDER
forecasted in PacifiCorp's Clean Energy Plan)	
as required by ORS 469A.420)	

Findings

This order implements the responsibilities given to the Oregon Department of Environmental Quality by ORS 469A.420 to verify greenhouse gas emissions projected in utility clean energy plans for power sold to retail electricity consumers. Subsection (1)(b) of that statute states that "the department shall use the method of measuring greenhouse gas emissions set forth in ORS 468A.280 to verify the projected greenhouse gas emissions reductions forecasted in a clean energy plan ..." Subsection (1)(c) requires that "The department shall report the department's findings ... to the Public Utility Commission and the electric company seeking acknowledgement of a clean energy plan."

In this order DEQ's evaluation of emissions is limited to the verification of the projected emissions reduction data provided as a component of PacifiCorp's 2025 Clean Energy Plan. DEQ's determination is a verification that PacifiCorp's method of measuring projected emissions associated with power sold to retail electricity consumers in the clean energy plan complies with ORS 468A.280 and rules adopted pursuant thereto, OAR Chapter 340, Division 215.

DEQ's verification does not evaluate the technical or economic feasibility of the projected data and does not make a determination on the certainty of the projected emissions reductions.

Verification of projected emissions for PacifiCorp's 2025 Clean Energy Plan

After a review and verification of data, DEQ has determined that the data submitted to DEQ by PacifiCorp on October 29, 2025, in compliance with their 2025 clean energy plan accurately utilizes the method of measuring projected emissions, as required under ORS 468A.280, and appropriately accounts for the emissions reductions that would occur under the required scenario.

In issuing this finding, DEQ verified that for calculating the projected emissions in PacifiCorp's 2025 Clean Energy Plan:

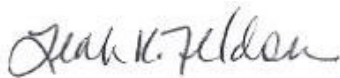
1. PacifiCorp used the method of measuring greenhouse gas emissions set forth in ORS 468A.280 and rules adopted pursuant thereto under OAR Chapter 340, Division 215, including:

- a. Consistent with OAR 340-215-0120(5)(c) PacifiCorp utilized the 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol methodology approved by the Oregon Public Utility Commission in Order No. 20-024 on January 23, 2020, and extended in Order No. 23-229 on June 30, 2023.
 - b. Consistent with OAR 340-215-0120(2) PacifiCorp applied DEQ approved and published 2025 clean energy plan emissions factors to calculate emissions from specified source electricity generating units;
 - c. Consistent with OAR 340-215-0120(1)(b)(B)(i) PacifiCorp applied a 1.02 transmission loss correction factor for power not measured at the busbar;
 - d. To align with the current requirements in OAR 340-215-0120(2)(a), PacifiCorp applied the default emission factor of 0.428 metric tons of carbon dioxide equivalent per megawatt-hour for calculating emissions from unspecified power; and
 - e. Consistent with ORS 469A.435(3), PacifiCorp calculated emissions from purchases from Bonneville Power Administration using the asset controlling supplier emission factor published by DEQ for 2025 clean energy plans.
2. Consistent with ORS 469A.435(2), PacifiCorp excluded greenhouse gas emissions associated with electricity acquired from net metering of customer resources and emissions from qualifying facilities under the terms of the Public Utility Regulatory Policies Act.

Order

Based on the findings and as directed by ORS 469A.420, the Department of Environmental Quality verifies that the projected emissions data submitted by PacifiCorp to DEQ on October 29, 2025, in compliance with PacifiCorp's 2025 Clean Energy Plan requirements, are calculated in accordance with ORS 468A.280.

Dated: 12/17/2025



By: _____

Leah Feldon
Director
Oregon Department of Environmental Quality