

May 30, 2014

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Public Utility Commission of Oregon  
3930 Fairview Industrial Dr. S.E.  
Salem, OR 97302-1166

Attn: Filing Center

**Re: PacifiCorp's Renewable Portfolio Standard Oregon Compliance Report for 2013  
and Motion for Protective Order**

PacifiCorp d/b/a Pacific Power submits for filing its Renewable Portfolio Standard Oregon Compliance Report for 2013 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.

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

PacifiCorp respectfully requests that all data requests in this docket be addressed to:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

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

Formal communications concerning this proceeding should be address to the following.

Oregon Dockets  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

Etta Lockey  
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Pacific Power  
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(503) 813-5701  
[etta.lockey@pacificorp.com](mailto:etta.lockey@pacificorp.com)

Public Utility Commission of Oregon  
May 30, 2014  
Page 2

Informal questions concerning this filing may be directed to Natasha Siores, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6583.

Sincerely,

A handwritten signature in cursive script that reads "R. Bryce Dalley".

R. Bryce Dalley  
Vice President, Regulation

Enclosures

cc: UM 1681 Service List

## CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's RPS Plan on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

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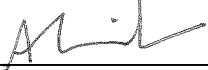
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Dated this 30<sup>th</sup> day of May, 2014.

  
\_\_\_\_\_  
Amy Eissler  
Coordinator, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM \_\_\_\_\_

In the Matter of

PACIFICORP D/B/A PACIFIC POWER

2013 Renewable Portfolio Standard  
Compliance Report.

Motion for Protective Order by PacifiCorp  
d/b/a Pacific Power

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

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

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<sup>1</sup> 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”).

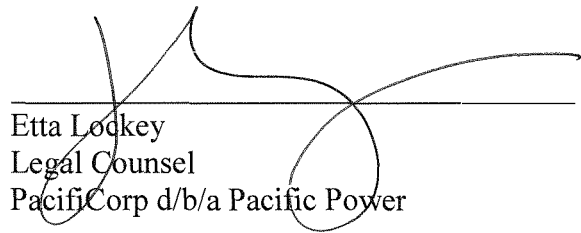
<sup>2</sup> OAR 860-001-0080(2).

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

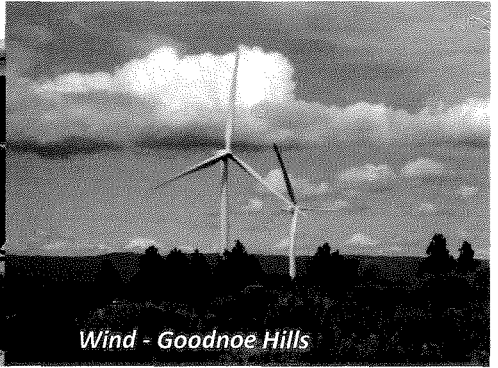
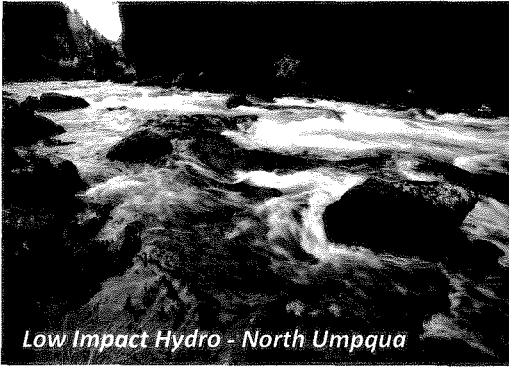
3 It is also substantially likely that the parties to these proceedings will seek to discover  
4 further information held by PacifiCorp, including confidential business information. Issuance  
5 of a protective order will facilitate the production of relevant information and expedite the  
6 discovery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

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

Respectfully submitted this 30<sup>th</sup> day of May, 2014.



Etta Lockey  
Legal Counsel  
PacifiCorp d/b/a Pacific Power



# **PacifiCorp**

## **Oregon Renewable Portfolio Standard Compliance Report 2013**

**May 30, 2014**

**PacifiCorp**  
**Renewable Portfolio Standard**  
**Oregon Compliance Report**  
**2013**

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**Introduction**

Pursuant to ORS 469A.170 and OAR 860-083-0350, PacifiCorp, d.b.a. Pacific Power (PacifiCorp or the Company), respectfully submits the 2013 Oregon Renewable Portfolio Standard Compliance Report (the 2013 RPS Compliance Report) to the Public Utility Commission of Oregon (Commission), for meeting 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 2013 RPS Compliance Report shows that the Company met the 2013 Oregon RPS target with a combination of banked bundled renewable energy certificates (RECs) and unbundled RECs. The Company used unbundled RECs with a vintage of 2008, 2010 and 2011, and did not use any RECs associated with generation from January 2014 through March 2014. The Company used RECs from generating facilities that are certified by the Oregon Department of Energy (ODOE) as eligible for the Oregon RPS program. 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 2013 RPS Compliance Report.

The Company calculated the incremental costs for the associated bundled RECs that were used for the 2013 compliance requirement and the total cost of RECs for 2007 through 2013. The costs for the renewable resources are consistent with the Company's 2015-2019 RPS Implementation Plan filed December 27, 2013.<sup>1</sup> The Company is currently awaiting Commission acknowledgment of its 2015-2019 RPS Implementation Plan.

In Order No. 14-034 in Docket UM 1616, the Commission adopted a stipulation resolving several issues related to the incremental cost calculation methodology and the Company's incremental costs included in this report are consistent with stipulation adopted by Order No. 14-034. The 2013 RPS Compliance Report shows that, using the methodology established by Commission's rules, the Company's incremental costs are negative and do not trigger the four percent cost limit under ORS 469A.100.

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<sup>1</sup> The Company's 2015-2019 RPIP, filed December 27, 2013 and docketed in Docket UM 1681, has not yet been approved by the Commission.

Pursuant to ORS 469.170(d) and (f),<sup>2</sup> 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 2013 IRP can be found at: <http://www.pacificorp.com/es/irp.html>

The company has filed an update to the 2013 IRP (IRP Update) and the information can also be found at: <http://www.pacificorp.com/es/irp.html>

Pursuant to ORS 469A.170 (e),<sup>3</sup> through 2012, PacifiCorp has 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 has included renewable resources associated with the Oregon Solar Incentive Program.

In the Company's 2013 IRP Update, new renewable resources required solely to meet state RPS obligations are not needed until 2024. This is due to the reduction in load forecast along with environmental assumptions.

On December 31, 2012, the Company issued a request for proposals (RFP) to solicit offers for the sale of unbundled RECs from generation facilities certified by the ODOE as RPS eligible. The Company specified proposals be for delivery of RECs generated between January 1, 2007 through December 31, 2015, with the understanding that any RECs purchased by the Company through this process that are not eligible for retirement in 2012 would be bankable per ORS 469A.140. The Company's purchase of unbundled RECs contributes to a cost-effective strategy to meet the Oregon RPS.

ORS 757.370(1) requires that, by January 1, 2020, the total solar photovoltaic generating nameplate capacity of all electric companies in Oregon be at least 20 MW<sub>AC</sub> from qualifying systems generating at least 500 kW<sub>AC</sub> but no more than 5 MW<sub>AC</sub>. To comply with this standard, as established by OAR 860-084-0020, PacifiCorp must acquire 8.7 MW<sub>AC</sub> of the total 20 MW<sub>AC</sub> before January 1, 2020. PacifiCorp may satisfy the solar photovoltaic generating capacity standard with systems owned by the Company or with power purchase agreements (PPA) with qualifying systems. All costs prudently incurred to comply with the solar photovoltaic generating capacity standard are recoverable in rates. Electricity produced by qualified solar projects under ORS 757.375 may be used to

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<sup>2</sup> ORS 469A.170(d) directs the Commission to consider “[w]hether the actions taken by the company or supplier are contributing to long term development of generating capacity using renewable energy sources; ORS 469A.170(f) directs the Commission to consider “[g]ood faith forecasting differences associated with the projected number of retail electricity consumers served and the availability of electricity from renewable energy sources.”

<sup>3</sup> ORS 469A.170 (e) The effect of the actions taken by the company or supplier on the rates payable by retail electricity consumers.



comply with the RPS established in ORS 469A.005 to 469A.210, and each MWh generated by a project over 500 kW<sub>AC</sub> that became operational before January 1, 2016, will be credited with two MWh of RECs toward PacifiCorp's RPS compliance. In October 2012 the Company acquired the Black Cap Solar project (Black Cap) to contribute to PacifiCorp's required 8.7 MW<sub>AC</sub> obligation under the solar photovoltaic capacity standard, contained in ORS 757.370 and OAR 860-084-0020. In 2013 PacifiCorp issued a second RFP and is currently in negotiations to finalize power purchase agreements (PPA) with two projects to acquire the remaining 6.7 MW<sub>AC</sub>. Black Cap is operational and the remaining two projects will be operational by December 31, 2015.

Accordingly, through December 31, 2013, there has been no direct customer rate impact associated with compliance with Oregon's RPS, with the exception of costs recovered through the Oregon Solar Incentive Program Deferral Adjustment, Schedule 204. The Company began recovering costs for the Black Cap Solar Project and unbundled REC purchases in February 2014.<sup>4</sup>

### **2013 RPS Compliance Report**

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

<b>OAR 860-083-0350(2)(a)</b>
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:**

The total number of megawatt-hours sold to Oregon retail consumers in 2013 was 13,089,969 megawatt-hours.

<b>OAR 860-083-0350(2)(b)</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.

#### **Response:**

There are no bundled certificates acquired in compliance year 2013 are used to meet the renewable portfolio standard requirement for compliance year 2013.

On December 31, 2012, PacifiCorp issued a RFP to solicit offers for the sale of unbundled RECs from generation facilities certified by the ODOE as RPS eligible. PacifiCorp specified that any proposals reflect delivery of RECs generated from

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<sup>4</sup> Please see Commission Order No. 14-018 in Docket UE 282.

January 1, 2007 through December 31, 2015. PacifiCorp will meet 20 percent of its 2013 RPS requirement with unbundled RECs from contracts executed prior to March 31, 2013. The total number of unbundled RECs that the Company will use toward the 2013 compliance year is 130,899.

**OAR 860-083-0350(2)(c)**

The total number 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, 2014 and March 31, 2014 that are used to meet the renewable portfolio standard for compliance year 2013.

Prior to year-end 2014, PacifiCorp plans to issue an RFP seeking historical, current-year or forward-year vintage unbundled RECs that will qualify for Oregon renewable portfolio standard compliance. As part of the solicitation process, PacifiCorp will evaluate the tradeoffs between acquiring bankable RECs early as a means to mitigate potentially higher cost long-term compliance alternatives versus pursuing alternative means of RPS compliance.

**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:**

As a result of the unbundled REC RFP on December 31, 2012, PacifiCorp acquired 600,000 unbundled RECs in 2013. PacifiCorp used 127,788 unbundled RECs toward its 2012 RPS compliance requirement. The remaining 472,212 were banked. PacifiCorp will use 130,899 of the 472,212 banked unbundled RECs for its 2013 compliance year. The remaining unbundled RECs are banked for future RPS compliance requirements.

For 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 2013 is 523,600.

For detail by facility, see Confidential Attachment A.

<b>OAR 860-083-0350(2)(f)</b>
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 1,476,262 bundled certificates issued in the compliance year 2013 that are banked for the RPS requirement for Oregon.

As of this filing, there are 35,002 bundled certificated that were transferred from the Energy Trust of Oregon to PacifiCorp and will be banked for the RPS requirement for Oregon.

As of this filing, there are 341,313 unbundled certificates that are banked for the RPS requirement for Oregon.

For detail by facility, see Confidential Attachment B.

<b>OAR 860-083-0350(2)(g)</b>
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

**Response:**

Most of Oregon’s share of RECs is banked for RPS compliance; however, not all RECs meet the Oregon RPS qualifications. The Company is a multi-state utility which allocates a portion of its renewable resources based on a state allocation process. 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:**

Table 1 lists the generating facilities associated with bundled renewable energy certificates and Table 2 lists the generating facilities associated with unbundled renewable energy certificates.

Energy Source	Generating Facility	Resource Type <sup>5</sup>	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
<b>Biogas</b>	Hill Air Force Base	QF	Davis	UT	2005	20 years	2.457	See Comment Below
<b>Geothermal</b>	Blundell II	Utility Owned	Beaver	UT	2007	Not Applicable	12	
<b>Wind</b>	Campbell Hill-Three Buttes	PPA	Converse	WY	2009	20 years	99	
	Chevron Casper Wind	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 <sup>6</sup>	Utility Owned	Carbon	WY	1999	Not Applicable	40.8	
	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	
	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	Unita	WY	2008	25 years	60.9	
	Mountain Wind Power II	QF	Unita	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		

<sup>5</sup> QF = Qualifying Facility  
PPA = Power Purchase Agreement  
SVP = Solar Volumetric Project  
ETO = Energy Trust of Oregon Funded Project

<sup>6</sup> 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 1**

Energy Source	Generating Facility	Resource Type <sup>5</sup>	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
<b>Hydro - Low Impact</b>	Ashton	Utility Owned	Fremont	ID	1917	Not Applicable	6.8	See Comment 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	
	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	
<b>Hydro - Incremental</b>	Big Fork	Utility Owned	Flathead	MT	1929	Not Applicable	Not Applicable	See Comment 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			

Table 1								
Energy Source	Generating Facility	Resource Type <sup>5</sup>	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Solar	Central Oregon (CO 1)	SVP	Jefferson, Deschutes, Crook	OR	2010	15 Years	.209 <sub>AC</sub>	100%
	Eastern Oregon (EO 1)	SVP	Umatilla, Wallowa	OR	2010		.211 <sub>AC</sub>	
	Portland Oregon (PO 1)	SVP	Multnomah, Clatsop	OR	2010		.249 <sub>AC</sub>	
	Willamette Valley (WV 1)	SVP	Marion, Benton, Linn, Lane, Polk	OR	2010		.227 <sub>AC</sub>	
	Southern Oregon (SO 1)	SVP	Jackson, Josephine, Klamath, Coos	OR	2010		.25 <sub>AC</sub>	
	Southern Oregon (SO 2)	SVP	Jackson, Josephine, Klamath, Coos	OR	2011		.265 <sub>AC</sub>	
	Central Oregon (CO 2)	SVP	Deschutes, Crook, Jefferson	OR	2011		.243 <sub>AC</sub>	
	Southern Oregon (SO 3)	SVP	Klamath, Lake, Jackson	OR	2011		.243 <sub>AC</sub>	
	Willamette Valley (WV 2)	SVP	Benton, Linn, Polk, Lane, Marion	OR	2011		.243 <sub>AC</sub>	
	Columbia River (CR 1)	SVP	Hood River, Morrow, Mosier,	OR	2011		.214 <sub>AC</sub>	
	Joseph Community Solar	SVP	Wasco, Sherman Wallowa	OR	2011		.425 <sub>AC</sub>	
	Eastern Oregon (EO2)	SVP	Umatilla, Wallowa	OR	2011		.167 <sub>AC</sub>	
	Southern Oregon (SO4)	SVP	Josephine, Klamath, Jackson	OR	2012		.248 <sub>AC</sub>	
	Southern Oregon (SO5)	SVP	Klamath, Jackson, Lincoln	OR	2012		.248 <sub>AC</sub>	
	Willamette Valley (WV 3)	SVP	Linn, Marion, Benton, Polk	OR	2012		.247 <sub>AC</sub>	
	Lakeview	SVP	Lake	OR	2012		.363 <sub>AC</sub>	
	Solwatt	SVP	Umatilla	OR	2012		.307 <sub>AC</sub>	
	Lakeview II	SVP	Lake	OR	2013		.421 <sub>AC</sub>	
	Southern Oregon (SO 6)	SVP	Klamath, Jackson, Josephine, Douglas	OR	2013		.245 <sub>AC</sub>	
	Southern Oregon (SO 7)	SVP	Klamath, Jackson, Coos	OR	2013		.25 <sub>AC</sub>	
	Willamette Valley (WV 4)	SVP	Benton, Linn	OR	2013		.251 <sub>AC</sub>	
	Willamette Valley (WV 5)	SVP	Linn, Marion, Benton, Polk	OR	2013		.251 <sub>AC</sub>	
	Willamette Valley (WV 6)	SVP	Linn, Marion, Benton, Polk	OR	2013		.251 <sub>AC</sub>	
Crook County	SVP	Crook	OR	2013	.411 <sub>AC</sub>			
Southern Oregon (SO 8)	SVP	Klamath, Jackson, Josephine	OR	2013	.221 <sub>AC</sub>			
Southern Oregon (SO 9)	SVP	Jackson	OR	2013	.061 <sub>AC</sub>			
Willamette Valley (WV 7)	SVP	Marion	OR	2014	.007 <sub>AC</sub>			
Solar	Black Cap**	Utility Owned	Lake	OR	2012	16 Years	2.0 <sub>AC</sub>	100%

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

**Table 1**

Energy Source	Generating Facility	Resource Type <sup>3</sup>	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 Below
	Central OR Siphon Power Proj	ETO	Deschutes	OR	1989		5.4	
	Copper Dam Plant	ETO	Hood River	OR	1986		3	
	Juniper Ridge Hydro Facility	ETO	Deschutes	OR	2010		5	
	Peters Drive Dam	ETO	Hood River	OR	1987		1.8	



**Table 2**

Energy Source	Generating Facility	Resource Type <sup>5</sup>	County	State	First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
<b>Biogas</b>	Dry Creek Landfill	PPA	Jackson	OR	2013	Not Applicable	Not Applicable	Not Applicable
	AgPower Jerome	PPA	Jerome	ID	2013			
<b>Wind</b>	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				
<b>Hydro - Incremental</b>	Rocky Reach Hydroelectric Project - C11	PPA	Chelan	WA	2013	Not Applicable	Not Applicable	Not Applicable

Resources listed in Table 1 above, with the exception of those associated with the Oregon Solar Incentive Program and Black Cap Solar project, are system resources. Resource costs are allocated on dynamic factors. For years 2007 through 2012, the following system generation allocation factors were used to allocate the renewable energy credits associated with the system resources:

<b>Table 3</b>						
<b>2010 Protocol Allocation Method - Oregon</b>						
<b>System Generation Factor</b>						
<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
27.44%	28.19%	27.49%	26.20%	25.81%	25.93%	25.20%

RECs associated with Combine Hills and other ETO-funded projects are assigned to the Energy Trust of Oregon 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.

<b>OAR 860-083-0350(2)(i)</b>
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 nor was it required to use alternative compliance payments for compliance with the RPS.

<b>OAR 860-083-0350(2)(j)</b>
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.

<b>OAR 860-083-0350(2)(k)</b>
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 Attachment C identifies the WREGIS certificates that PacifiCorp intends to retire to meet the RPS for compliance year 2013. Upon Commission approval of the 2013 RPS Compliance Report, the Company will retire these WREGIS certificates.

<b>OAR 860-083-0350(2)(l)</b>
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 2013 RPS Compliance Report is consistent with the acknowledged 2013-2017 RPS Implementation Plan with the exception that the 2013 RPS Compliance Report includes additional facilities that are certified by ODOE, including projects in the Oregon Solar Incentive Program, hydroelectric facilities with upgrades, and the Black Cap Solar project.

As described earlier, in developing the costs reported in the 2013 RPS Compliance Report, the cost information is from the most recently filed 2015-2019 RPS Implementation Plan, where the costs were developed in accordance with OAR-860-083-0100.

<b>OAR 860-083-0350(2)(m)</b>
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 bundled renewable energy certificates used to meet the renewable portfolio standard for compliance year 2013 is 523,600.

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

<b>OAR 860-083-0350(2)(n)</b>
For each electric company, its projected annual revenue requirement as calculated in OAR 860-083-0200 and its total cost of compliance.

**Response:**

The table below shows the annual revenue requirement for 2013, per the company's compliance filing for OAR 860-083-0200 submitted on January 3, 2013, and the company's total cost of compliance for 2013.

<b>Table 4</b>			
	<b>Oregon Allocated Nominal Levelized Incremental Cost (\$000s)</b>	<b>4% of Oregon Annual Revenue Requirement (\$000s)</b>	<b>% Oregon Annual Revenue Requirement Threshold</b>
2013	\$197	\$48,056	0.02%

**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 2013 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 2013. The amount of RECs is subject to change if any additional renewable resources are certified with the Oregon Department of Energy.

<b>OAR 860-083-0350(2)(s)</b>
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:**

The new qualifying resources since the last compliance report are:

<b>Table 5</b>					
<b>Energy Source</b>	<b>Generating Facility</b>	<b>Resource Type <sup>7</sup></b>	<b>County</b>	<b>State</b>	<b>Commercial Operation Year or First Year Contract</b>
<b>Hydro</b>	C Drop Hydro	ETO	Klamath	OR	NA
	Central OR Siphon Power Proj	ETO	Deschutes	OR	NA
	Copper Dam Plant	ETO	Hood River	OR	NA
	Juniper Ridge Hydro Facility	ETO	Deschutes	OR	NA
	Peters Drive Dam	ETO	Hood River	OR	NA
<b>Solar</b>	Crook County	SVP	Crook	OR	2014
	Lakeview II	SVP	Lake	OR	2013
	Southern Oregon (SO 6)	SVP	Klamath	OR	2013
	Southern Oregon (SO 7)	SVP	Klamath	OR	2013
	Southern Oregon (SO 8)	SVP	Klamath	OR	2014
	Willamette Valley (WV 4)	SVP	Benton	OR	2013
	Willamette Valley (WV 5)	SVP	Linn, Marion	OR	2013
	Willamette Valley (WV 6)	SVP	Linn	OR	2013
	Southern Oregon (SO 9)	SVP	Jackson	OR	2013
	Willamette Valley (WV 7)	SVP	Marion	OR	2014
<b>Wind</b>	Red Mesa	PPA	Cibola	NM	2013

For details on number of RECs and cost information, see Confidential Attachment D.

<sup>7</sup> QF = Qualifying Facility  
 PPA = Power Purchase Agreement  
 SVP = Solar Volumetric Project  
 ETO = Energy Trust of Oregon Funded Project

**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.

**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 required under OAR 860-038-0300.

**PacifiCorp  
Renewable Portfolio Standard Oregon  
Compliance Report  
2013**

**Attachment A**

**CONFIDENTIAL  
2013 RPS Compliance  
RECs and Cost Information**

THIS ATTACHMENT IS  
CONFIDENTIAL AND  
PROVIDED UNDER  
SEPARATE COVER



**PacifiCorp  
Renewable Portfolio Standard Oregon  
Compliance Report  
2013**

**Attachment B**

**CONFIDENTIAL  
Banked Bundled and Unbundled RECs**

THIS ATTACHMENT IS  
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PROVIDED UNDER  
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**PacifiCorp  
Renewable Portfolio Standard Oregon  
Compliance Report  
2013**

**Attachment C**

**CONFIDENTIAL  
2013 RPS Compliance  
WREGIS Certificates**

THIS ATTACHMENT IS  
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SEPARATE COVER

**PacifiCorp  
Renewable Portfolio Standard Oregon  
Compliance Report  
2013**

**Attachment D**

**CONFIDENTIAL  
Vintage 2007 – Vintage 2013  
RECs and Cost Information**

THIS ATTACHMENT IS  
CONFIDENTIAL AND  
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SEPARATE COVER