

June 1, 2020

VIA ELECTRONIC FILING

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

RE: UM 2100—PacifiCorp’s Renewable Portfolio Standard Oregon Compliance Report for 2019

PacifiCorp d/b/a Pacific Power submits for filing with the Public Utility Commission of Oregon (Commission) its Renewable Portfolio Standard Oregon Compliance Report for 2019 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 860-0001-0070.

On May 27, 2020, in Order No. 20-172, the Commission granted PacifiCorp’s motion for a general protective order in this proceeding.

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

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
oregondockets@pacificorp.com

Riley Peck
Attorney
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Riley.Peck@pacificorp.com

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

By email (preferred): datarequest@pacificorp.com.

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

Informal inquiries may be directed to Cathie Allen at (503) 813-5934.

Public Utility Commission of Oregon

June 1, 2020

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Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Wilding". The signature is fluid and cursive, with the first name "Michael" and the last name "Wilding" clearly distinguishable.

Michael Wilding

Director, Net Power Costs & Regulatory Policy

Enclosures

cc: UM 2014 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 2019** on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

SERVICE LIST UM 2014

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Dated this 1st day of June, 2020.



Mary Penfield
Adviser, Regulatory Operations



PacifiCorp

Oregon Renewable Portfolio Standard Compliance Report 2019

June 1, 2020

**PacifiCorp
Renewable Portfolio Standard
Oregon Compliance Report
2019**

Introduction

As required by Oregon Revised Statute (ORS) 469A.170 and Oregon Administrative Rule (OAR) 860-083-0350, PacifiCorp d/b/a Pacific Power (PacifiCorp) respectfully submits this 2019 Oregon Renewable Portfolio Standard Compliance Report (2019 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 2019 RPS Compliance Report shows that PacifiCorp met the 2019 Oregon RPS target with a combination of **1,955,073** renewable energy certificates (RECs). PacifiCorp used bundled RECs with a vintage of **2010, 2011, 2012, 2018, and 2019** and unbundled RECs with vintages of **2017** and **2018**, from generating facilities certified by the Oregon Department of Energy (ODOE) as Oregon RPS-eligible. The generating facilities, either owned by PacifiCorp or under contract, are registered in the Western Renewable Energy Generation Information System (WREGIS) and the associated WREGIS certificates are reported in this 2019 RPS Compliance Report.

In accordance with ORS 469A.170(2)(e), through 2019, 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 (OSIP) for RPS compliance. The company used banked **2011, 2012** and **2018** vintage OSIP RECs as well as **2019** vintage OSIP RECs.

The company has calculated the incremental costs for the RECs that will be used for the 2019 compliance requirement and the total cost of RECs for 2007 through 2019. The incremental costs associated with the renewable resources used for 2019 RPS compliance are consistent with PacifiCorp's 2019-2023 Renewable Portfolio Implementation Plan (RPIP),¹ the applicable RPIP for compliance year 2019. The incremental costs for resources that were not included in the 2019-2023 RPIP, are consistent with the 2021-2023 RPIP² and do not require re-calculation for the 2019 RPS compliance report. Consistent with the 2019-2023 and 2021-2023 acknowledged RPIPs, using the methodology established by the Commission's rules, PacifiCorp's incremental costs for compliance year 2019 do not trigger the four percent cost limit under ORS 469A.100.

¹ The 2019-2023 RPIP filed in docket UM 1914 was acknowledged by the Commission by Order No. 18-186 on May 23, 2018.

² The 2021-2023 RPIP filed in docket UM 2049 was acknowledged by the Commission by Order No. 20-136 on April 27, 2020. The Commission granted a waiver in Order No. 19-447 of OAR 860-083-0400 sections 2-5 in 2019, to allow time for the Commission, staff, and parties to address various RPS-related issues in dockets AR 610, 616, 617, and 622. In its waiver, the Commission required parties to submit an RPIP for the next odd-numbered year and the subsequent two years (2021-2023).

2019 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 **13,088,664** megawatt-hours were sold to Oregon retail consumers in 2019. The company subtracted **54,847** megawatt-hours of Oregon Direct Access load served by electricity service suppliers to whom PacifiCorp transferred the associated RECs for the Electricity Service Suppliers' RPS compliance obligation.

| 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. |

Response:

A total of **195,757** unbundled certificates were acquired in 2019. No unbundled certificates acquired in 2019 were used to meet the renewable portfolio standard in compliance year 2019. A total of **1,609,229** bundled certificates were acquired in the compliance year. Of those, **37,833** bundled certificates were used to meet the renewable portfolio standard requirement for compliance year 2019.³

| 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:

No bundled or unbundled certificates acquired on or between January 1, 2020, and March 31, 2020, were used to meet the renewable portfolio standard for compliance year 2019.

| 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. |

³ Includes **21,733** RECs transferred from the Energy Trust of Oregon (ETO) and **16,100** RECs associated with the OSIP.

Response:

The total number of unbundled RECs used to meet the renewable portfolio standard for compliance year 2019 is **110,731**.

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 2019 is **1,806,509**. Energy Trust of Oregon projects provided 7,133 vintage 2017 RECs, and 2,515 vintage 2018 RECs for 2019 compliance, as allowed per their funding agreements. The company does not treat those as banked because they were acquired in compliance year 2019.

For detail by facility, see Confidential Attachment A.

| |
|--|
| 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 **1,571,396** bundled certificates issued in the compliance year 2019 that are banked for the RPS requirement for Oregon.

As of this filing, there are **195,757** unbundled certificates issued in compliance year 2019 that are banked for the RPS requirement for Oregon.

As of this filing, there are 7 bundled certificates issued in compliance year 2019 that were transferred from the Energy Trust of Oregon to PacifiCorp and 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 |
|--------------------------|---------------------|
| N/A | N/A |

Response:

PacifiCorp 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) |
|---|
| <p>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:</p> <p>(A) The name of the facility;</p> <p>(B) The county and state where the facility is located;</p> <p>(C) The type of renewable resource;</p> <p>(D) The total nameplate megawatt capacity of the facility;</p> <p>(E) For an electric company, the Oregon share of the nameplate megawatt capacity of the facility;</p> <p>(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</p> <p>(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.</p> |

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, those that have received certification for RPS eligibility through the ODOE, 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 | |
| Geothermal | Blundell II | Utility Owned | Beaver | UT | 2007 | Not Applicable | 12 | |
| Wind | Campbell Hill-Three Buttes | PPA | Converse | WY | 2009 | 20 years | 99 | See Comment and Table 4 Below |
| | 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 | 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 | Utah | 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 | |
| | Pioneer Wind | QF | Converse | WY | 2016 | 20 years | 80.0 | |
| | 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 PacifiCorp held a short term PPA with Chevron Casper Wind which terminated June 30, 2018.

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 | |
| Prospect 3 | Utility Owned | Jackson | OR | 1932 | 7.7 | | | |
| 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 | | .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 | | .25 _{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} | |

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) |
|---------------|--------------------------|----------------------------|--------------------------------------|-------|--|----------|-----------------------|-------------------------|
| | Willamette Valley (WV 2) | SVP | Benton, Linn, Polk, Lane, Marion | OR | 2011 | 15 years | .243 _{AC} | 100% |
| | Columbia River (CR 1) | SVP | Hood River, Morrow, Mosier | OR | 2011 | | .214 _{AC} | |
| | 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 (EO 3) | SVP | Crook, Deschutes | OR | 2016 | | .225 _{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) |
|------------------|---------------------------|----------------------------|--------------|-------|--|---------------------|-----------------------|-------------------------|
| | Portland Oregon (PO 3) | SVP | Multnomah | OR | 2016 | | .103 _{AC} | |
| | Southern Oregon (SO 13) | SVP | Klamath | OR | 2016 | | .009 _{AC} | |
| | Willamette Valley (WV 10) | SVP | Marion, Linn | OR | 2017 | | .034 _{AC} | SG |
| | Keeton 1 | SVP | Klamath | OR | 2016 | | .085 _{AC} | |
| | Keeton 2 | SVP | Klamath | OR | 2016 | | .085 _{AC} | |
| | Hammerich 1 | SVP | Klamath | OR | 2016 | | .085 _{AC} | |
| | Hammerich 2 | SVP | Klamath | OR | 2016 | | .085 _{AC} | |
| Solar | Adams Solar | QF | Jefferson | OR | 2018 | 20 years | 10.0 _{AC} | CAGW ⁶ |
| | Bear Creek Solar | QF | Deschutes | OR | 2018 | 20 years | 10.0 _{AC} | CAGW ⁷ |
| | Bly Solar | QF | Klamath | OR | 2018 | 20 years | 8.50 _{AC} | CAGW ⁸ |
| | Elbe Solar | QF | Jefferson | OR | 2018 | 20 years | 10.0 _{AC} | CAGW ⁹ |
| | Black Cap** | Utility Owned | Lake | OR | 2012 | 16 years | 2.0 _{AC} | 100% |
| | Pavant | QF | Millard | UT | 2015 | 10 years | 50.0 _{AC} | CAGW ¹⁰ |
| | Pavant II | QF | Millard | UT | 2016 | 10 years | 50.0 _{AC} | SG |
| | Enterprise | QF | Iron | UT | 2016 | 10 years | 80.0 _{AC} | CAGW ¹¹ |
| | Sage Solar I | QF | Lincoln | WY | 2019 | 20 years | 20.0 _{AC} | SG |
| | Sage Solar II | QF | Lincoln | WY | 2019 | 20 years | 20.0 _{AC} | SG |
| | Sage Solar III | QF | Lincoln | WY | 2019 | 20 years | 17.6 _{AC} | SG |
| Sweetwater Solar | QF | Sweetwater | WY | 2018 | 20 years | 80.00 _{AC} | SG | |

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

⁶ Oregon receives its Control Area Generation West (CAGW) share of this resource, which is treated partially as bundled and partially as unbundled.

⁷ Oregon receives its CAGW share of this resource, which is treated partially as bundled and partially as unbundled.

⁸ Oregon receives its CAGW share of this resource, which is treated partially as bundled and partially as unbundled.

⁹ Oregon receives its CAGW share of this resource, which is treated partially as bundled and partially as unbundled.

¹⁰ Oregon receives its CAGW share of this resource, which is treated partially as bundled and partially as unbundled.

¹¹ Oregon receives its CAGW share of this resource, which is treated partially as bundled and partially as unbundled.

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 | | 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 Astoria – Bear Creek | ETO | Clatsop | OR | 2015 | Not Applicable | 0.03 | |
| | City of Albany Hydro | ETO | Linn | OR | 2009 | | 0.50 | |
| | Watson Hydro | ETO | Malheur | OR | 2016 | | 0.70 | |
| Biogas | Farm Power Misty Meadow | ETO | Tillamook | OR | 2013 | Not Applicable | 0.75 | |

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 Wind | PPA | Logan | CO | 2016 | | | | |
| Hydro - Incremental | Rocky Reach Hydroelectric Project - C11 | PPA | Chelan | WA | 2013 | Not Applicable | Not Applicable | Not Applicable |
| Solar | Pavant | QF | Millard | UT | 2015 | 10 years | Not Applicable | Not Applicable |
| | Enterprise | QF | Iron | UT | 2016 | 10 years | | |
| | Adams | QF | Jefferson | OR | 2018 | 20 years | | |
| | Bear Creek | QF | Deschutes | OR | 2018 | 20 years | | |
| | Bly | QF | Klamath | OR | 2018 | 20 years | | |
| | Elbe | QF | Jefferson | OR | 2018 | 20 years | | |

Resources listed in Table 2, with the exception of those associated with the Oregon Solar Incentive Program, the Black Cap Solar project, Combine Hills Wind, Pavant and Enterprise Solar are system resources. Resource costs for system resources are allocated based on dynamic factors. For years 2007 through 2018, 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 |
| 27.44% | 28.19% | 27.49% | 26.20% | 25.81% | 25.93% | 25.20% |
| 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | |
| 25.51% | 25.47% | 26.62% | 25.77% | 26.06% | 26.32% | |

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:

PacifiCorp 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:

PacifiCorp 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 2019. Upon Commission approval of the 2019 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 2019 RPS Compliance Report is consistent with the 2019-2023 RPIP acknowledged by the Commission. There are no material deviations from the applicable implementation plan filed under OAR 860-083-0400, with the exception of new resources for which contracts had not been executed, and repowered wind resources for which incremental costs had not been calculated at the time of the 2019-2023 filing. In the 2019-2023 RPIP, the company's compliance strategy included seeking near-term procurement opportunities for unbundled or bundled RECs and utilizing RECs with the shortest life first, in order to meet its compliance obligation. This is consistent with the company's approach to compliance in 2019. Additionally, in the 2019 RPS Compliance report, the company responded to concerns expressed by staff and stakeholders about intergenerational equity associated with the company's REC bank. PacifiCorp is meeting a portion of its 2019 compliance requirement with older-vintage banked RECs. The company will continue to prioritize a shortest-life-first retirement strategy to ensure customers retain all value associated with renewable investments and appropriately account for future uncertainty. There are no other material deviations in this 2019 RPS Compliance Report 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 2019 is **1,955,073**.

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 2019, consistent with PacifiCorp’s compliance filing under OAR 860-083-0200 submitted on November 15, 2018, and the company’s total cost of compliance for 2019. PacifiCorp’s 2019 incremental cost of compliance as a percentage of annual revenue requirement does not exceed the threshold of four percent of annual revenue requirement.

| Table 5 | | | | |
|------------------------|---|--|---|--|
| Compliance Year | Oregon Allocated Nominal Levelized Incremental Cost (\$000s) | 2019 Revenue Requirement (\$000s) | 4% of Oregon Annual Revenue Requirement (\$000s) | % Oregon Annual Revenue Requirement Threshold |
| 2019 | \$10,594 | 1,302,201 | \$52,088 | 0.81% |

| 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 2019 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 2019. The amount of RECs is subject to change if any additional renewable resources are certified with ODOE or any additional RECs transferred to the company from the Energy Trust of Oregon.

| 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. Goodnoe Hills was repowered in 2019, but not contemplated in the company's 2017 IRP or 2019-2023 RPIP. Incremental costs for this facility was calculated in the company's 2021-2023 RPIP.

| Table 6 – New Added Resources | | | | | |
|--|---------------------|-----------------------------|------------|-------|--|
| Energy Source (*Repowered Resource) | Generating Facility | Resource Type ¹² | County | State | Commercial Operation Year or First Year Contract |
| Solar | Sage Solar I | QF | Lincoln | WY | 2019 |
| | Sage Solar II | QF | Lincoln | WY | 2019 |
| | Sage Solar III | QF | Lincoln | WY | 2019 |
| | Sweetwater Solar | QF | Sweetwater | WY | 2018 |
| Wind* | Goodnoe Hills | Utility Owned | Klickitat | WA | 2008 |

| 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. |

¹² QF = Qualifying Facility
PPA = Power Purchase Agreement
SVP = Solar Volumetric Project
ETO = Energy Trust of Oregon Funded Project

Response:

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

| 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:

PacifiCorp 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
2019**

Attachment A

**CONFIDENTIAL
2019 RPS Compliance
RECs and Cost Information**

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER SEPARATE
COVER**

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2019**

Attachment B

**CONFIDENTIAL
Banked RECs – 2019 Vintage**

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER SEPARATE
COVER**

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2019**

Attachment C

**CONFIDENTIAL
2019 RPS Compliance
WREGIS Certificates – Bundled and
Unbundled RECs**

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER SEPARATE
COVER**

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2019**

Attachment D

**CONFIDENTIAL
Vintage 2007 – Vintage 2019
RECs and Cost Information**

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER SEPARATE
COVER**

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2019**

Attachment E

**2019 RPS Compliance
REC Summary**

**PacifiCorp
Renewable Portfolio Standard
Attachment E – Compliance REC Summary
Oregon Compliance Report – Compliance Year 2019**

The bundled and unbundled renewable energy certificates (RECs) to be retired for PacifiCorp’s 2019 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 2019 Renewable Portfolio Standard
Aggregated Data**

| Bundled RECs | | Vintage Year | | | | | |
|----------------------|------------------------|--------------|----------------|----------------|----------|---------------|---------------|
| RESOURCE TYPE | LOCATION | 2010 | 2011 | 2012 | 2017 | 2018 | 2019 |
| BIOGAS | UT | - | 1,823 | 3,689 | - | - | |
| GEOHERMAL | UT | - | 12,610 | 21,213 | - | - | |
| HYDRO - LOW IMPACT | ID, OR, UT | - | 165,042 | - | - | - | |
| HYDRO - INCREMENTAL | MT, CA, UT, OR, ID, WA | - | 7,190 | - | - | - | |
| SOLAR | OR, UT | - | - | - | - | 31,704 | |
| SOLAR - OSIP | OR, UT | - | 1,122 | 4,605 | - | 30 | 16,100 |
| WIND | ID, OR, WA, WY | 36 | 664,419 | 893,026 | - | - | - |
| BUNDLED TOTAL | | 36 | 852,206 | 922,533 | 0 | 31,734 | 16,100 |

| Unbundled RECs | | | | | Vintage Year | | |
|------------------------|-----------------|-------------|-------------|-------------|---------------------|--------------|-------------|
| RESOURCE TYPE | LOCATION | 2010 | 2011 | 2012 | 2017 | 2018 | 2019 |
| SOLAR | UT | - | - | - | 106,293 | 4,438 | - |
| UNBUNDLED TOTAL | | 0 | 0 | 0 | 106,293 | 4,438 | 0 |

| Energy Trust RECs | | | | | Vintage Year | | |
|---------------------------|-----------------|-------------|-------------|-------------|---------------------|--------------|---------------|
| RESOURCE TYPE | LOCATION | 2010 | 2011 | 2012 | 2017 | 2018 | 2019 |
| BIOGAS | OR | | | | | | 3,786 |
| HYDRO | OR | | | | 7,133 | 2,515 | 8,299 |
| ENERGY TRUST TOTAL | | 0 | 0 | 0 | 7,133 | 2,515 | 12,085 |

| | |
|------------------------|------------------|
| TOTAL 2019 RECs | 1,955,073 |
|------------------------|------------------|