

May 31, 2019

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: UM 2014—PacifiCorp’s Renewable Portfolio Standard Oregon Compliance Report for 2018

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 2018 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 29, 2019, in Order No. 19-190, the Commission granted PacifiCorp’s motion for a standard 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

Jessica Ralston
Senior Attorney
825 NE Multnomah Street, Suite 1800
Portland, OR 97232
Jessica.Ralston@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

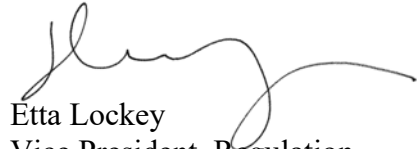
Public Utility Commission of Oregon

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Etta Lockey', with a long, sweeping horizontal line extending to the right.

Etta Lockey
Vice President, Regulation

Enclosures

cc: UM 1959 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 2018 on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

SERVICE LIST UM 1959

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

Caroline Moore (C)
Public Utility Commission Of Oregon
PO Box 1088
Salem, OR 97308-1088
caroline.f.moore@state.or.us

Cynthia Hansen-Mifsud (C)
Pacific Power
825 NE Multnomah Ste 800
Portland OR 97232
cynthia.hansen@pacificorp.com

Johanna Riemenschneider (C)
PUC Staff - Department Of Justice
1162 Court St NE
Salem OR 97301-4796
johanna.riemenschneider@doj.state.or.us

Dated this 31st day of May, 2019



Katie Savarin
Coordinator, Regulatory Operations



PacifiCorp

Oregon Renewable Portfolio Standard Compliance Report 2018

May 31, 2019

PacifiCorp
Renewable Portfolio Standard
Oregon Compliance Report
2018

Introduction

As required by ORS 469A.170 and OAR 860-083-0350, PacifiCorp, d/b/a Pacific Power (PacifiCorp), respectfully submits this 2018 Oregon Renewable Portfolio Standard Compliance Report (2018 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 2018 RPS Compliance Report shows that PacifiCorp met the 2018 Oregon RPS target with a combination of 1,930,085 bundled and unbundled renewable energy certificates (RECs). PacifiCorp used bundled RECs with a vintage of 2017 and 2018 and unbundled RECs with a vintage of 2015 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 2018 RPS Compliance Report as Attachment C.

The incremental costs associated with the renewable resources used for 2018 RPS compliance are consistent with PacifiCorp’s 2017-2021 Renewable Portfolio Implementation Plan (RPIP),¹ the applicable RPIP for compliance year 2018. The incremental costs for resources that were not included in the 2017-2021 RPIP, are consistent with the 2019-2023 RPIP² and do not require re-calculation for the 2018 RPS compliance report. Consistent with the 2017-2021 and 2019-2023 acknowledged RPIPs, using the methodology established by the Commission’s rules, PacifiCorp’s incremental costs for compliance year 2018 do not trigger the four percent cost limit under ORS 469A.100.

2018 RPS Compliance Report

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

¹ The 2017-2021 RPIP filed in docket UM 1790 was acknowledged by the Commission by Order No. 17-010 on January 13, 2017.

² The 2019-2023 RPIP filed in docket UM 1914 was acknowledged by the Commission by Order No. 18-186 on May 23, 2018.

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 12,867,233 megawatt-hours were sold to Oregon retail consumers in 2018.

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 166,013 unbundled certificates and a total of 1,682,368 bundled³ certificates acquired in 2018 were used to meet the renewable portfolio standard for compliance year 2018.

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, 2019 and March 31, 2019 that are used to meet the renewable portfolio standard for compliance year 2018.

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:

The total number of unbundled RECs used to meet the renewable portfolio standard for compliance year 2018 is 237,387.

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:

³ This includes 11,173 RECs transferred from the Energy Trust of Oregon and 4,113 Black Cap RECs eligible for the 2x1 multiplier under ORS 757.375.

The total number of banked bundled RECs used to meet the renewable portfolio standard for compliance year 2018 is 1,692,698.

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 the date of this filing, there are 95,714 bundled certificates issued in the compliance year 2018 that are banked for future Oregon RPS compliance.

As of the date of this filing, there are 4,438 unbundled certificates issued in compliance year 2018 that are banked for future Oregon RPS compliance.

As of the date of this filing, there are no bundled certificates issued in compliance year 2018 that were transferred from the Energy Trust of Oregon (ETO) 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
NA	NA

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 eligible RECs is banked for RPS compliance; however, not all RECs meet the Oregon RPS qualifications. While the company sells RECs generated by Oregon-eligible resources, these RECs are not Oregon-allocated RECs; they are RECs allocated to the company’s other state jurisdictions. Therefore, no Oregon RPS-compliant RECs allocated to Oregon or 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	
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 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	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	
	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.

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	
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 (CO 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}	SG
	Southern Oregon (SO 13)	SVP	Klamath	OR	2016		.009 _{AC}	
	Willamette Valley (WV 10)	SVP	Marion, Linn	OR	2017		.034 _{AC}	
	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	Black Cap**	Utility Owned	Lake	OR	2012	16 years	2.0 _{AC}	100%
	Adams	QF	Jefferson	OR	2018	18 years	10.0 _{AC}	CAGW ⁷
	Bear Creek	QF	Jefferson	OR	2018	18 years	10.0 _{AC}	CAGW ⁷
	Bly	QF	Jefferson	OR	2018	18 years	8.5 _{AC}	CAGW ⁷
	Elbe	QF	Jefferson	OR	2018	18 years	10.0 _{AC}	CAGW ⁷
	Pavant	QF	Millard	UT	2015	10 years	50.0 _{AC}	CAGW ⁷
	Pavant II	QF	Millard	UT	2016	10 years	50.0 _{AC}	SG
Enterprise	QF	Iron	UT	2016	10 years	80.0 _{AC}	CAGW ⁷	

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

⁷ Oregon receives its Control Area Generation West (CAGW) share of RECs from 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	Not Applicable	1.1	See Comment and Table 4 Below
	COID - Siphon Power	ETO	Deschutes	OR	1989		5.4	
	COID - Juniper Ridge Hydro	ETO	Deschutes	OR	2010		5	
	Swalley Irrigation District	ETO	Deschutes	OR	2010		0.75	
	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 Type ⁶	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

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	
	COID - Juniper Ridge Hydro	ETO	Deschutes	OR	2010		5	
	Swalley Irrigation District	ETO	Deschutes	OR	2010		0.75	
	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 Type ⁶	County	State	First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Solar	Adams	QF	Jefferson	UT UT	2018	18 years	Not Applicable	Not Applicable
	Bear Creek	QF	Jefferson		2018	18 years		
	Bly	QF	Jefferson		2018	18 years		
	Elbe	QF	Jefferson		2018	18 years		
	Pavant	QF	Millard		2015	10 years		
	Enterprise	QF	Iron		2016	10 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, Adams, Bear, Bly, Elbe, Pavant and Enterprise Solar are system resources for which RECs are allocated using the state allocation process. 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 system resources:

Table 4					
2010 Protocol Allocation Method - Oregon					
System Generation Factor					
2007	2008	2009	2010	2011	2012
27.44%	28.19%	27.49%	26.20%	25.81%	25.93%
2013	2014	2015	2016	2017	2018
25.20%	25.51%	25.47%	26.62%	25.77%	26.06%

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 REC purchases and the costs associated with those purchases are accounted for and deferred in accordance with Commission Order No. 13-064 issued in docket UM 1646 and Order No. 17-019 issued 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 2018. Upon Commission approval of the 2018 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 2018 RPS Compliance Report is consistent with the 2017-2021 RPIP acknowledged by the Commission with the exception of new resources for which contracts had not been executed at the time of the 2017-2021 filing. In the 2017-2021 RPIP filing, 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. As this is consistent with the company's approach to compliance in 2018, 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 2018 is 1,930,085.

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 RPS compliance year 2018, per PacifiCorp's compliance filing in accordance with OAR 860-083-0200(1)(b) submitted on November 14, 2017, and the company's total cost of compliance for 2018.

PacifiCorp's 2018 incremental cost of compliance as a percentage of annual revenue requirement does not exceed the 4 percent of annual revenue requirement threshold.

Table 5				
Compliance Year	Oregon Allocated Nominal Levelized Incremental Cost (\$000s)	2018 Revenue Requirement (\$000s)	4% of Oregon Annual Revenue Requirement (\$000s)	% Oregon Annual Revenue Requirement Threshold
2018	\$15,629	1,248,443	\$49,938	1.25%

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 2018 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 issued for the period 2007 through 2018.

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 set forth in Table 6 below.⁸

Table 6 – New Added Resources					
Energy Source	Generating Facility	Resource Type⁹	County	State	Commercial Operation Year or First Year Contract
Solar	Adams	QF	Jefferson	OR	2018
	Bear Creek	QF	Jefferson	OR	2018
	Bly	QF	Jefferson	OR	2018
	Elbe	QF	Jefferson	OR	2018

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:

PacifiCorp 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

⁸ The total number of RECs included in Attachment D for 2018 include RECs from resources for which the company is currently seeking and anticipates receiving RPS-certification from the Oregon Department of Energy. While those resources are not used for 2018 compliance, they will be banked for future RPS compliance use.

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

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
2018**

Attachment A

**CONFIDENTIAL
2018 RPS Compliance
RECs and Cost Information**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2018**

Attachment B

**CONFIDENTIAL
Banked RECs – 2018 Vintage**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2018**

Attachment C

**CONFIDENTIAL
2018 RPS Compliance
WREGIS Certificates – Bundled and
Unbundled RECs**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2018**

Attachment D

**CONFIDENTIAL
Vintage 2007 – Vintage 2018
RECs and Cost Information**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2018**

Attachment E

**2018 RPS Compliance
REC Summary**

PacifiCorp
Renewable Portfolio Standard
Attachment E – Compliance REC Summary
Oregon Compliance Report – Compliance Year 2018

The bundled and unbundled RECs to be retired for PacifiCorp’s 2018 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 2018 Renewable Portfolio Standard
Aggregated Data

Bundled RECs		Vintage Year		
RESOURCE TYPE	LOCATION	2015	2017	2018
BIOGAS	UT			3,575
GEOHERMAL	UT			12,948
HYDRO - LOW IMPACT	ID, OR, UT			252,810
HYDRO - INCREMENTAL	MT, CA, UT, OR, ID, WA			9,955
SOLAR ¹	OR			39,906
SOLAR – OSIP	OR			16,555
WIND	ID, OR, WA, WY			1,335,446
BUNDLED TOTAL		0	0	1,671,195

Unbundled RECs		Vintage Year		
RESOURCE TYPE	LOCATION	2015	2017	2018
WIND	CO	71,374		
SOLAR	UT			166,013
VINTAGE TOTAL		71,374	0	166,013
UNBUNDLED TOTAL		237,387		

Energy Trust RECs		Vintage Year		
RESOURCE TYPE	LOCATION	2015	2017	2018
BIOGAS	OR		254	4,081
HYDRO	OR		10,076	7,092
VINTAGE TOTAL		0	10,330	11,173
ENERGY TRUST TOTAL		21,503		

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 2018, a total of 4,113 RECs from Black Cap RECs are set aside for retirement in WREGIS. However, these 4,116 RECs contribute a total of 8,226 megawatt-hours (RECs) towards the compliance year.

TOTAL 2018 RECs	1,930,087
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