

May 29, 2025

#### VIA ELECTRONIC FILING

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

Re: UM 2386—PacifiCorp's Renewable Portfolio Standard Oregon Compliance Report for 2024

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Renewable Portfolio Standard Oregon Compliance Report for 2024 in accordance with ORS 469A.170 and OAR 860-083-0350. Attachments A-D are confidential and provided in accordance with General Protective Order No. 23-132.

If you have any questions about this filing, please contact Amira Streeter, State Regulatory Affairs Manager, at (503) 260-4420.

Sincerely,

Robert Meredith Director, Regulation

Enclosures

#### **CERTIFICATE OF SERVICE**

I certify that I served a true and correct copy of PacifiCorp's Renewable Portfolio Standard Oregon Compliance Report for 2024 on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

#### SERVICE LIST UM 2325

PacifiCorp, dba Pacific Power 825 NE Multnomah St., Suite 2000 Portland, OR 97232 oregondockets@pacificorp.com

Natascha Smith (C)
PUC Staff - Department of Justice
Business Activities Section
1162 Court St NE
Salem OR 97301-4796
natascha.b.smith@doj.state.or.us

Joni Sliger Oregon Dept of Energy 550 Capitol St. NE 1<sup>st</sup> Floor Salem, OR 97301 Joni.sliger@energy.oregon.gov Zachary Rogala (C)
Pacific Power
zachary.rogala@pacificorp.com

Alondra Regalado (C) Public Utility Commission of Oregon PO Box 1088 Salem OR 97308-1088 alondra.regalado@puc.oregon.gov

Dated this 29<sup>th</sup> day of May, 2025.

Carrie Meyer

Manager, Discovery & Regulatory

Operations



### **PacifiCorp**

# Oregon Renewable Portfolio Standard Compliance Report 2024

May 29, 2025



#### PacifiCorp Renewable Portfolio Standard Oregon Compliance Report 2024

#### 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 or Company) respectfully submits this 2024 Oregon Renewable Portfolio Standard Compliance Report (2024 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 2024 RPS Compliance Report shows that PacifiCorp met the 2024 Oregon RPS target with **2,796,471** bundled and unbundled renewable energy certificates (RECs). PacifiCorp used bundled and unbundled RECs with a vintage of **2021, 2022, 2023 and 2024**, 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 2024 RPS Compliance Report.

In accordance with ORS 469A.170(2)(e), through 2024, 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 2024 vintage OSIP RECs.

The Company has calculated the incremental costs for the RECs that will be used for the 2024 compliance requirement and the total cost of RECs for 2007 through 2024. The incremental costs associated with the renewable resources used for 2024 RPS compliance are consistent with PacifiCorp's 2023-2025 Renewable Portfolio Implementation Plan (RPIP), the applicable RPIP for compliance year 2024. Consistent with the 2023-2025 acknowledged RPIP, using the methodology established by the Commission's rules, PacifiCorp's incremental costs for compliance year 2024 do not trigger the four percent cost limit under ORS 469A.100.

#### **2024 RPS Compliance Report**

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

<sup>&</sup>lt;sup>1</sup> The 2023-2025 RPIP filed in docket UM 2212 was acknowledged by the Commission by Order No. 21-487 on December 28, 2021.

#### 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 13,991,113 megawatt-hours were sold to Oregon retail consumers in 2024. A total of 8,763 megawatt-hours are associated with the Oregon Community Solar Program subscriptions and are eligible to be deducted from the amount of electricity sold by the electric company to retail electricity consumers for the purpose of calculating the electric company's renewable portfolio standard under ORS 469A.052. A total of 458,822 megawatt-hours are associated with Oregon Direct Access load served by electricity service suppliers to whom PacifiCorp transferred the associated 91,769 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 **207,999** unbundled certificates were acquired in 2024. No unbundled certificates acquired in 2024 were used to meet the RPS in compliance year 2024. A total of **2,913,673** bundled certificates were acquired in the compliance year. Of those, **28,481** bundled certificates with a vintage of 2024 were used to meet the RPS requirement for compliance year 2024.<sup>2</sup>

#### 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, 2025, and March 31, 2025, were used to meet the RPS for compliance year 2024.

#### 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 RPS for compliance year 2024 is **392,836**.

<sup>&</sup>lt;sup>2</sup> Includes **6,861** RECs (2024 vintage) transferred to the Company from the Energy Trust of Oregon (ETO), **13,872** RECs associated with the OSIP and 7.748 RECs includes 2x Solar multiplier, per ORS 757.375.

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 RPS for compliance year 2024 is **2,375,154**. The total number of banked bundled RECs from ETO projects was **6,302** from vintage 2022 and 2023 that were used for 2024 compliance, per their ETO funding agreements. There were six vintage 2022 RECs associated with the Oregon Solar Incentive Program that were used for 2024 compliance.

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 **2,889,066** bundled certificates issued or received in the compliance year 2024 that are banked for the RPS requirement for Oregon.

As of this filing, there are **207,999** unbundled certificates issued in compliance year 2024 that are banked for the RPS requirement for Oregon.

As of this filing, there are **0** bundled certificates issued in compliance year 2024 that were transferred from the ETO to PacifiCorp and banked for the RPS requirement for Oregon.

For detail by facility, see Confidential Attachments B 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

<sup>&</sup>lt;sup>3</sup> Includes 2x Black Cap Solar multiplier, per ORS 757.375

#### **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)

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 RECs, and Table 3 lists the generating facilities associated with unbundled RECs. 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 <sup>4</sup>	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW) See	
Biogas	Hill Air Force Base	QF	Davis	UT	2005	20 years	2.457	Comment and Table 4	
Biomass	RFP Dillard	QF	Douglas	OR	1955	20 years	20	See Comment and Table 4	
Geothermal	Blundell II	Utility Owned	Beaver	UT	2007	Not Applicable	12	See Comment and Table 4	
Wind	Campbell Hill-Three Buttes Cedar Springs I Cedar Springs II Cedar Springs III Chevron Casper Wind <sup>5</sup> Combine Hills Dunlap I Ekola Flats Wind Foote Creek I Foote Creek III Foote Creek IV Glenrock I Glenrock III Goodnoe Hills High Plains Latigo Leaning Juniper I	PPA PPA PPA Utility Owned PPA QF PPA Utility Owned	Converse Converse Converse Converse Natrona Umatilla Carbon Carbon Carbon Carbon Carbon Carbon Charbon Carbon	WY WY WY WY OR WY WY WY WY WY WY Utah OR	2009 2021 2021 2021 2009 2003 2010 2021 1999 2014 2014 2008 2009 2008 2009 2016 2006	20 years 20 years Not Applicable 20 years 5 years 20 years Not Applicable Not Applicable Not Applicable 5 years 5 years Not Applicable	99 199.4 198.8 133.3 16.5 41 111 250 40.8 1.80 24.50 99 39 94 99 60 100.5	See Comment and Table 4	

<sup>&</sup>lt;sup>4</sup> QF = Qualifying Facility

PPA = Power Purchase Agreement

SVP = Solar Volumetric Project SG= System Generation Factor which is used to derive Oregon's share of resource allocation from PacifiCorp's total system

ETO = Energy Trust of Oregon Funded Project
<sup>5</sup> 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 <sup>4</sup>	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Source	Marengo	Utility Owned	Columbia	WA	2007	Not Applicable	140.4	(IVI VV )
	Marengo II	Utility Owned	Columbia	WA	2008	Not Applicable	70.2	
	McFadden Ridge	Utility Owned	Albany & Carbon	WY	2009	Not Applicable	28.5	
	Meadow Creek Five Pine	QF	Bonneville	ID	2012	20 years	40	
	Meadow Creek North Point	QF	Bonneville	ID	2012	20 years	80	
	Mountain Wind Power	QF	Uinta	WY	2008	25 years	60.9	
	Mountain Wind Power II	QF	Uinta	WY	2008	25 years	79.8	
	Orchard Wind Farm 1	QF	Umatilla	OR	2020	20 years	10	
	Orchard Wind Farm 2	QF	Umatilla	OR	2020	20-years	10	
	Orchard Wind Farm 3	QF	Umatilla	OR	2020	20 years	10	
	Orchard Wind Farm 4	QF	Umatilla	OR	2020	20 years	10	
	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	
	TB Flats I	Utility Owned	Carbon	WY	2021	Not Applicable	306	
	TB Flats II	Utility Owned	Carbon	WY	2021	Not Applicable	194	
	Top of the World	PPA	Converse	WY	2010	20 years	200.2	
	Wolverine Creek	PPA	Bonneville	ID	2005	20 years	64.5	
	Ashton	Utility Owned	Fremont	ID	1917		6.8	
	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	See
	Oneida	Utility Owned	Franklin	ID	1915		30	Comment
Hydro-	Prospect 3	Utility Owned	Jackson	OR	1932	NT . 4 12 11	7.7	and Table 4
Low Impact	Slide Creek	Utility Owned	Douglas	OR	1951	Not Applicable	18	Below
F	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	

			<b>Table 2 – Bundled RECs</b>					
Energy Source	Generating Facility	Resource Type <sup>4</sup>	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Source	Central Oregon (CO 1)	SVP	Jefferson, Deschutes, Crook	OR	2010	Duration	$.209_{\mathrm{AC}}$	(WIW)
	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	
Solar	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	15 Years	.214 AC	100%
	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 AC	
	Southern Oregon (SO5)	SVP	Klamath, Jackson, Lincoln	OR	2012		$.248_{\mathrm{AC}}$	
	Willamette Valley (WV 3)	SVP	Linn, Marion, Benton, Polk	OR	2012		.247 <sub>AC</sub>	
	Lakeview	SVP	Lake	OR	2012		$.363_{\mathrm{AC}}$	
	Solwatt	SVP	Umatilla	OR	2012		$.307_{ m AC}$	
	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		$.250_{\mathrm{AC}}$	
	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		$.061_{\mathrm{AC}}$	
	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		$.007_{ m AC}$	
	Solwatt II	SVP	Umatilla	OR	2014		$.168_{\mathrm{AC}}$	
	Powell Butte Solar	SVP	Crook	OR	2014		.164 AC	
	Southern Oregon (SO 10)	SVP	Klamath, Josephine, Douglas, Jackson	OR	2014		.249 <sub>AC</sub>	
	Southern Oregon (SO 11)	SVP	Klamath, Josephine, Jackson	OR	2014		.212 AC	
Solar	Columbia River (CR 2)	SVP	Wasco	OR	2014	15 years	.009 <sub>AC</sub>	100%

			Table 2 – Bundled RECs					
Energy		Resource			Commercial Operation Year or First Year		Nominal Capacity	OR Share Nameplate
Source	Generating Facility	Type <sup>4</sup>	County	State	Contract	Duration	(MW)	(MW)
	CTWS (Tribes W. Springs)	SVP	Jefferson	OR	2014		$.254\mathrm{AC}$	
	Bourdet 5713351	SVP	Klamath	OR	2014		$.084_{ m \ AC}$	
	Willamette Valley (WV 8)	SVP	Linn, Polk	OR	2015		$.203$ $_{\mathrm{AC}}$	
	Willamette Valley (WV 9)	SVP	Linn, Marion	OR	2015		$.047_{ m AC}$	
	Southern Oregon (SO 12)	SVP	Klamath, Jackson	OR	2015		$.245_{ m AC}$	
	Bourdet 5903801	SVP	Klamath	OR	2016		$.084_{ m \ AC}$	
	Central Oregon (CO 4)	SVP	Deschutes	OR	2016		$.034_{ m AC}$	
	Eastern Oregon (EO 3)	SVP	Crook, Deschutes	OR	2016		$.225_{ m \ AC}$	
	Portland Oregon (PO 3)	SVP	Multnomah	OR	2016		$.103_{ m AC}$	
	Southern Oregon (SO 13)	SVP	Klamath	OR	2016		$.009\mathrm{AC}$	
	Willamette Valley (WV 10)	SVP	Marion, Linn	OR	2017		$.034_{\mathrm{AC}}$	
	Keeton 1	SVP	Klamath	OR	2016		$.085_{ m \ AC}$	
	Keeton 2	SVP	Klamath	OR	2016		$.085\mathrm{AC}$	
	Hammerich 1	SVP	Klamath	OR	2016		$.085_{\mathrm{AC}}$	
	Hammerich 2	SVP	Klamath	OR	2016		$.085_{\mathrm{AC}}$	
	Hammerich 3	SVP	Klamath	OR	2018		$.085_{\mathrm{AC}}$	
	Hammerich 4	SVP	Klamath	OR	2018		$.085_{\mathrm{AC}}$	
	Hammerich 5	SVP	Klamath	OR	2018		$.085_{\mathrm{AC}}$	
	Hammerich 6	SVP	Klamath	OR	2018		$.085_{\mathrm{AC}}$	
	Adams Solar	QF	Jefferson	OR	2018	20 years	10.0 <sub>AC</sub>	$CAGW^7$
	Bear Creek Solar	QF	Deschutes	OR	2018	20 years	$10.0_{\mathrm{AC}}$	CAGW <sup>8</sup>
	Bly Solar	QF	Klamath	OR	2018	20 years	$8.50_{\mathrm{AC}}$	CAGW <sup>9</sup>
Solar	Elbe Solar	QF	Jefferson	OR	2018	20 years	$10.0_{ m AC}$	CAGW <sup>10</sup>
Solai	Black Cap <sup>6</sup>	Utility Owned	Lake	OR	2012	16 years	$2.0_{ m \ AC}$	100%
	Pavant	QF	Millard	UT	2015	20 years	$50.0_{ m  AC}$	CAGW <sup>11</sup>
	Pavant II	QF	Millard	UT	2016	20 years	$50.0_{ m AC}$	SG
	Enterprise	QF	Iron	UT	2016	20 years	$80.0_{ m AC}$	50

.

<sup>&</sup>lt;sup>6</sup> Facility is eligible for 2x1 REC multiplier under ORS 757.375.

<sup>&</sup>lt;sup>7</sup> Oregon receives its Control Area Generation West (CAGW) share of this resource, which is treated partially as bundled and partially as unbundled.

<sup>&</sup>lt;sup>8</sup> Oregon receives its Control Area Generation West (CAGW) share of this resource, which is treated partially as bundled and partially as unbundled.

<sup>&</sup>lt;sup>9</sup> Oregon receives its Control Area Generation West (CAGW) share of this resource, which is treated partially as bundled and partially as unbundled.

<sup>&</sup>lt;sup>10</sup> Oregon receives its Control Area Generation West (CAGW) share of this resource, which is treated partially as bundled and partially as unbundled.

<sup>&</sup>lt;sup>11</sup> Oregon receives its Control Area Generation West (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 <sup>4</sup>	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
	Chiloquin	QF	Klamath	OR	2018	20 years	9.9 AC	CAGW <sup>12</sup>
	Klamath Falls Solar 2	QF	Klamath	OR	2017	20 years	$2.9_{\mathrm{AC}}$	SG
	Norwest Energy 9	QF	Umatilla	OR	2018	13 years	$6.0_{\mathrm{AC}}$	SG
	OR Solar 2 (Agate Bay)	QF	Jackson	OR	2020	20 years	$10.0_{\mathrm{AC}}$	SG
	OR Solar 3 (Turkey Hill)	QF	Klamath	OR	2017	20 years	$10.0_{\mathrm{AC}}$	SG
	OR Solar 5 (Merrill)	QF	Klamath	OR	2018	20 years	$8.0_{ m AC}$	SG
	OR Solar 6 (Lakeview)	QF	Lake	OR	2017	20 years	$10.0_{\mathrm{AC}}$	SG
	OR Solar 8 (Dairy)	QF	Klamath	OR	2018	20 years	$10.0_{AC}$	SG
	OSLH (Collier)	QF	Deschutes	OR	2017	20 years	$9.90_{\mathrm{AC}}$	SG
	Sage Solar I	QF	Lincoln	WY	2019	20 years	$20.0_{\mathrm{AC}}$	SG
	Sage Solar II	QF	Lincoln	WY	2019	20 years	$20.0_{ m AC}$	SG
	Sage Solar III	QF	Lincoln	WY	2019	20 years	$17.6_{AC}$	SG
	Sweetwater Solar	QF	Sweetwater	WY	2018	20 years	$80.00{\rm AC}$	SG
	Tumbleweed Solar	QF	Deschutes	OR	2017	20 years	$9.90_{\rm \ AC}$	SG
	Woodline Solar	QF	Klamath	OR	2017	20 years	$8.0_{ m AC}$	SG
								SG
	C Drop Hydro	ETO	Klamath	OR	2012		1.1	
	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	See
Hydro	FID - Peters Drive Dam	ETO	Hood River	OR	1987	Not Applicable	1.8	Comment
11, 413	Opal Springs Hydro	ETO	Deschutes	OR	1982	- : 3.1.1PP.1.28310	4.3	and Table 4
	Swalley Irrigation District	ETO	Deschutes	OR	2010		0.75	Below
	City of Astoria – Bear Creek	ETO	Clatsop	OR	2015		0.03	
	City of Albany Hydro	ETO	Linn	OR	2009		0.50	
	Watson Hydro	ETO	Malheur	OR	2016	37 1 11 11	0.70	_
Biogas	Farm Power Misty Meadow	ETO	Tillamook	OR	2013	Not Applicable	0.75	

<sup>.</sup> 

<sup>&</sup>lt;sup>12</sup> Oregon receives its Control Area Generation West (CAGW) share of this resource, which is treated partially as bundled and partially as unbundled.

		Table 3 –	Unbundled R	RECs				
Energy Source	Generating Facility	Resource Type <sup>6</sup>	County	State	First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Biogas	Dry Creek Landfill	PPA	Jackson	OR ID	2013	Not Applicable	Not	Not
	AgPower Jerome Mountain View I	PPA	Jerome Riverside	CA	2013 2013	11	Applicable	Applicable
	Mountain View I  Mountain View II	PPA PPA	Riverside	CA CA	2013			
	Condon	PPA	Gilliam	OR	2013			
	Foote Creek II	PPA	Carbon	WY	2013			Not Applicable
	Klondike I	PPA	Sherman	OR	2013			
	Stateline	PPA	Walla Walla	WA	2013			
	Kittitas Valley Wind	PPA	Kittitas	WA	2013		Not	
Wind	Nine Canyon Wind Project	PPA	Benton	WA	2013	Not Applicable	Applicable	
	Nine Canyon Phase 3	PPA	Benton	WA	2013		11	11
	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
	Pavant	QF	Millard	UT	2015	10 years		
	Enterprise	QF	Iron	UT	2016	10 years		
Solar	Adams	QF	Jefferson	OR	2018	20 years	Not	Not
Solai	Bear Creek	QF	Deschutes	OR	2018	20 years	Applicable	Applicable
	Bly	QF	Klamath	OR	2018	20 years		
	Elbe	QF	Jefferson	OR	2018	20 years		

Resources listed in Table 2—except for those associated with the OSIP, the Black Cap Solar project, Combine Hills Wind, Adams Solar, Bear Creek Solar, Bly Solar, Elbe Solar, Pavant Solar, and Enterprise Solar—are system resources. Resource costs for system resources are allocated based on dynamic factors. For the years 2007 through 2024, the following system generation allocation factors were used to allocate the RECs associated with the system resources:

Table 4 Multi-State Protocol Allocation - Oregon System Generation Factor							
Year	Annual Percentage						
2007	27.44%						
2008	28.19%						
2009	27.49%						
2010	26.20%						
2011	25.81%						
2012	25.93%						
2013	25.20%						
2014	25.51%						
2015	25.47%						
2016	26.62%						
2017	25.77%						
2018	26.06%						
2019	26.32%						
2020	27.14%						
2021	26.95%						
2022	26.72%						
2023	27.28%						
2024	25.80%						

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 identifies the WREGIS certificates that PacifiCorp intends to retire to meet the RPS for compliance year 2024. Upon Commission approval of the 2024 RPS Compliance Report, the Company will retire these WREGIS certificates.

#### OAR 860-083-0350(2)(1)

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 2024 RPS Compliance Report is consistent with the 2023-2025 RPIP acknowledged by the Commission. The Company received approval of its 2023-2025 RPIP on April 5, 2022, see Order 22-111. PacifiCorp used the analysis from the approved 2023-2025 RPIP to inform the total costs for the 2024 RPS Compliance Report. PacifiCorp used the analysis from the approved 2023-2025 RPIP to inform the total costs for the 2024 RPS Compliance Report because it has the most up to date levelized incremental cost available for PacifiCorp's applicable RPS resources. Specifically, PacifiCorp used the levelized incremental costs calculated under Scenario 6 – November 8, 2021, official forward price curve. In addition, the Company has included ETO purchased megawatt-hours and associated REC information in the total purchased category. There are no material deviations from the 2023-2025 RPIP implementation plan filed under OAR 860-083-0400 in terms of overall compliance outcomes and REC use strategies, with the exception of the Company utilizing more older vintage RECs in its bank to address intergenerational equity concerns raised by staff in 2021-2023 RPIP and the 2023-2025 RPIP. PacifiCorp is meeting a portion of its 2024 compliance requirement with older-vintage banked RECs.

-

<sup>&</sup>lt;sup>13</sup> UM 2212 – 2023-2025 RPIP

<sup>&</sup>lt;sup>14</sup> UM 2049 - 2021-2023 RPIP

#### 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 bundled RECs used to meet the RPS for compliance year 2024 is **2,399,761**. 15

For details 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 2024, consistent with PacifiCorp's compliance filing under OAR 860-083-0200 submitted on November 15, 2023, and the Company's total cost of compliance for 2024. PacifiCorp's 2024 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)	2024 Revenue Requirement (\$000s)	4% of Oregon Annual Revenue Requirement (\$000s)	% Oregon Annual Revenue Requirement Threshold
2024	(\$1,925)	\$1,727,169	\$69,087	4.0%

#### 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.

13

<sup>&</sup>lt;sup>15</sup> Does not include 2x Black Cap Solar multiplier

#### 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 2024 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 2024. The number of RECs is subject to change if any additional renewable resources are certified with ODOE or any additional RECs are transferred to the Company from the ETO.

#### 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 numbers of RECs and cost information, see Confidential Attachment D. The new qualifying resources since the last compliance year report are listed below.

	Table 6 – New Added Resources									
Energy Source	Generating Facility	State	Operation Yea or First Year Contract							
Wind	Orchard Wind Farm 1	Purchase	Umatilla	OR	2020					
Wind	Orchard Wind Farm 2	Purchase	Umatilla	OR	2020					
Wind	Orchard Wind Farm 3	Purchase	Umatilla	OR	2020					
Wind	Orchard Wind Farm 4	Purchase	Umatilla	OR	2020					
Solar	Chiloquin Solar	Purchase	Klamath	OR	2018					
Solar	Klamath Falls Solar 2(Ewauna)	Purchase	Klamath	OR	2017					
Solar	Norwest Energy 9 (Pendelton)	Purchase	Umatilla	OR	2018					
Solar	OR Solar 2 (Agate Bay)	Purchase	Jackson	OR	2020					
Solar	OR Solar 3 (Turkey Hill)	Purchase	Klamath	OR	2017					
Solar	OR Solar 5 (Merrill Solar)	Purchase	Klamath	OR	2018					
Solar	OR Solar 6 (Lakeview Solar)	Purchase	Lake	OR	2017					
Solar	OR Solar 8 (Dairy)	Purchase	Klamath	OR	2018					
Solar	OSLH (Collier Solar)	Purchase	Deschutes	OR	2017					
Solar	Tumbleweed Solar	Purchase	Deschutes	OR	2024					
Solar	Woodline Solar	Purchase	Klamath	OR	2024					

#### 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 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 2024

### **Attachments A-D**

CONFIDENTIAL AND PROVIDED UNDER SEPARATE COVER

# PacifiCorp Renewable Portfolio Standard Oregon Compliance Report 2024

### **Attachment E**

2024 RPS Compliance REC Summary

## PacifiCorp Renewable Portfolio Standard Attachment E – Compliance REC Summary Oregon Compliance Report – Compliance Year 2024

The bundled and unbundled renewable energy certificates (RECs) to be retired for PacifiCorp's 2024 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 2024 Renewable Portfolio Standard Aggregated Data

<b>Bundled RECs</b>			Vintage Year				
RESOURCE TYPE	LOCATION	2021	2022	2023	2024		
BIOGAS	UT	0	2,834	0	0		
BIOMASS	OR	0	14,415	0	0		
GEOTHERMAL	UT	0	22,135	0	0		
HYDRO - LOW IMPACT	ID, OR, UT	0	100,994	0	0		
HYDRO - INCREMENTAL	MT, CA, UT, OR, ID, WA	0	7,528	0	0		
SOLAR <sup>1</sup>	OR, UT	194,103	142,690	0	3,874		
- SOLAR MULTIPLIER	OR				3,874		
SOLAR - OSIP	OR, UT	0	6	0	13,872		
WIND	ID, OR, WA, WY	463,929	1,420,218	0	0		
BUNDLED TOTAL		658,032	1,710,820	0	21,620		

<sup>&</sup>lt;sup>1</sup> 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. In 2024, a total of 3,874 megawatt-hours were generated from Black Cap, respectively. However, these megawatt-hours contribute a total of 7,748 megawatt-hours or RECs towards the compliance year.

<b>Unbundled RECs</b>					
RESOURCE TYPE	LOCATION	2021	2022	2023	2024
SOLAR	UT	195,188	197,648	0	0
UNBUNDLED TOTAL		195,188	197,648	0	0

<b>Energy Trust RECs</b>					
RESOURCE TYPE	LOCATION	2021	2022	2023	2024
BIOGAS	OR	0	0	0	1,934
HYDRO	OR	0	130	6,172	4,927
ENERGY TRUST TOTAL		0	130	6,172	6,861

TOTAL 2024 RECs 2,796,471
---------------------------