

November 2, 2020

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: LC 70 - PacifiCorp Informational Filing on Customer Preference Agreements in Rocky Mountain Power's Utah Service Territory

PacifiCorp, d/b/a Pacific Power (PacifiCorp) submits this informational filing in compliance with docket LC 70, Order No. 20-186. In Order No. 20-186 the Commission acknowledged the 2019 Integrated Resource Plan Action Item 2a subject to a condition. The condition requires PacifiCorp to file workpapers “for resource acquisition and rate setting in any customer preference RFP with the Oregon Commission in this docket at the time it files a request for waiver or notice of exception under the competitive bidding rules or within 30 days of acquisition of the resource, whichever occurs first.”

In 2020, PacifiCorp entered into seven contracts with individual customers in Utah under the authority of Utah Tariff Schedule 34 – Renewable Energy Purchases for Qualified Customers. This schedule allows retail customers the opportunity to direct PacifiCorp to procure all or a portion of their retail load from an eligible renewable facility; the customer is subsequently billed under the terms of Schedule 34. Provided as Highly Confidential Attachment A is a high level summary of the agreements. PacifiCorp ran a request for proposal (RFP) on behalf of the customers in Contracts 3 and 4. For the remaining contracts, the customers ran their own RFPs and brought the projects to PacifiCorp for final contract negotiation. Consistent with the 2020 Protocol, these customer specific agreements are situs assigned to Utah and will **not** be included in Oregon customer rates.

Contracts 1 and 2 were signed prior to the issuance of Order No. 20-186. Contracts 3, 4, and 5 were signed in September 2020, but are subject to additional requirements before they are actually considered final. Contracts 3 and 4 are subject to approval by the Utah Public Service Commission. These contracts are subject to cancellation prior to approval. For Contract 5 there must be available transmission capacity through a network transmission study in order for the contract to be effective. While not officially final until the steps listed above are complete, Contracts 3, 4, and 5 are provided in the Highly Confidential Attachment A for the purpose of full transparency. The remaining contracts executed October 15, 2020, are effective and not subject to further requirements before they are considered final.

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The information provided in Highly Confidential Attachment A is highly protected information subject to Modified Protective Order No. 20-035. This information is considered commercially sensitive, non-public information related to contracts that customers have negotiated with developers and signed with PacifiCorp under Utah Schedule 34. Release of this information would put PacifiCorp and its customers at a disadvantage when negotiating future contracts with developers.

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

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Please direct informal inquiries regarding this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Michael G. Wilding
Director, Net Power Costs and Regulatory Policy

Highly Confidential Attachment A

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

CERTIFICATE OF SERVICE

I certify that I filed a true and correct copy of PacifiCorp's **Informational Filing** on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

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Dated November 2, 2020.



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