



Portland General Electric
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July 12, 2018

Email / US Mail

Public Utility Commission of Oregon
Filing Center
201 SE High Street
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1958 - PGE 2017 Renewable Portfolio Standard Compliance Report

Enclosed please find Portland General Electric Company's ("PGE") 2017 Renewable Portfolio Standard ("RPS") Compliance Report with an updated page 8. The replacement page provides an update to the total number of Renewable Energy Certificates used for compliance in 2017.

As we noted previously, portions of the Report are protected information and subject to treatment as prescribed under Protective Order 18-203 (Protected Information) due to their commercially sensitive nature. Those protected portions have been redacted. Hardcopies of the unredacted pages will be placed on yellow paper in a separately sealed envelope bearing the legend "Protected." Please do not place the protected portions on the OPUC website, nor release it to anyone outside the Public Utility Commission Staff.

Please store the hardcopy in a locked file cabinet. If you are unable to honor these requests, please notify us immediately.

If you have any questions or require further information, please call Lynn Latendresse at (503) 464-8370 or Richard George at (503) 464-7611. Please direct all formal correspondence and requests to the following email addresses: richard.george@pgn.com and pge.opuc.filings@pgn.com

Sincerely,

A handwritten signature in blue ink that reads "Jay Tinker". The signature is written in a cursive, flowing style.

Jay Tinker
Director, Regulatory Policy and Affairs

JT/np
Enclosures

**Portland General Electric
Renewable Portfolio Standard
Oregon Compliance Revised Report 2017
UM 1958**

This revised report includes an updated total number of RECs for OAR 860-083-0350(2)(m).

As an introduction and summary of the Compliance Report, answer the following questions:

Why is PGE submitting a Compliance Report? What information was used as the basis of this Compliance Report?

PGE is submitting this Compliance Report to fulfill the requirements of ORS 469A.170. The report is based on information from PGE's 2016 Integrated Resource Plan (IRP) and PGE's 2016 Renewable Portfolio Standard (RPS) Revised Renewable Portfolio Implementation Plan (RPIP), UM 1788, filed July 15, 2016.

Did the company meet its RPS target, and if not, describe in detail why not?

Yes, PGE has met its 2017 RPS target. The compliance details are provided in this report.

Provide the following information 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:

For 2017, the total number of megawatt-hours sold to retail electricity consumers was:

PGE's Total Billed Load: 17,751,419 megawatt-hours

Source: 2017 PGE FERC Form 1 (Page 304, Row 41, Column (b)).

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:

There were 532,543 unbundled certificates and 27,087 bundled certificates acquired for the compliance year 2017 (January 1, 2017 - December 31, 2017) that will be used to meet the 2017 RPS requirement.

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 28,850 bundled certificates acquired between January 1, 2018 and March 31, 2018 that will be used to meet the RPS requirement for compliance year 2017.

There are no unbundled certificates acquired and/or issued in 2018 that will be used to meet the RPS requirement for compliance year 2017.

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 table below shows the total number and cost by facility of the unbundled renewable energy certificates (RECs) used to meet the RPS. PGE is using the maximum allowable unbundled RECs, which is 20% of PGE's total obligation.

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 that will be used to meet the RPS for compliance year 2017 is:

$$2,114,534^1 = (2,662,713 - 532,543 - 15,636)$$

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:

There are 0 unbundled certificates that were issued in the compliance year that were banked to serve Oregon electricity consumers.

As of this filing, there are 2,300,050² bundled certificates issued for the compliance year 2017 that will be banked to serve Oregon electricity consumers.

See the 2017 column in Attachment C for detail by facility of total RECs generated.

¹ Excludes 15,636 of two-for-one (2:1) RECs, for qualifying systems as prescribed in ORS 757.375, because these RECs are not banked.

² Total RECs generated in 2017 (See Attachment C – 2,259,749), less 2:1 RECs (See attachment C – 15,636), plus purchased bundled RECs issued in 2017 (55,937).

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.**

Response:

The table below shows the total number by facility and year issued of RECs included in the rates of Oregon retail electricity consumers that were sold since the last compliance report:

Facility	Year	Number of RECs
Biglow Canyon Wind Farm - Biglow Canyon 3	2017	263,017
Biglow Canyon Wind Farm - Biglow Phase 2	2017	312,272
Tucannon River Wind Farm - Tucannon River 1	2017	312,896
Tucannon River Wind Farm - Tucannon River 2	2017	341,238
Totals		1,229,423

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:

See Attachment A.

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:

There were no alternative compliance payments that PGE elected to use or was required to use to comply with the applicable renewable portfolio standard.

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:

PGE will not be making any voluntary 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:

The attached WREGIS report (Attachment B) shows all RECs to be used to meet the 2017 RPS. The RECs are currently in an active sub-account named “2017 Compliance RPS.” Within 30 days of the approval of PGE’s RPS Compliance Report by the Commission, the RECs will be retired to a retirement sub-account named “OR RPS 2017.” To validate compliance, PGE will then send a retirement report from WREGIS to the Commission.

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 table below presents a comparison between the 2017 REC requirements as forecasted in UM 1788 (PGE’s 2016 Revised RPIP) (Attachment E) and the proposed 2017 REC retirements for 2017 RPS Compliance (Attachment B).

Material changes arose due to:

- Lower overall compliance requirement due to lower than forecast loads; a reduction of 59,763 RECs.

- REC purchases: as stated in prior RPIPs, PGE intends to continue monitoring REC activity and may transact for bundled or unbundled RECs opportunistically on behalf of customers. Unbundled RECs beyond those included in our 2016 Revised RPIP were available at low prices consistent with prior unbundled REC purchases; thus, PGE purchased and proposes to retire unbundled RECs equal to 20% of the 2017 RPS obligation. Consistent with previous years, PGE monitors for and attempts to acquire Bundled RECs beyond what was included in our 2016 Revised RPIP were available at low prices and economically beneficial to PGE's customers when considering PGE's overall compliance strategy. The opportunities for REC transactions continue to be illiquid, meaning limited counterparties and pricing uncertainty, thus, PGE does not project to procure any unbundled or Bundled RECs on a forward basis.
- Biglow Canyon and Tucannon River RECs: The distribution of actual retired RECs across the Biglow Canyon and Tucannon River wind projects differ from the 2016 Revised RPIP due to differences in the forecasted and actual REC bank positions by REC type and vintage prior to retirement and the use of unbundled RECs for compliance. PGE retired RECs in the following priority: retirement of 5-yr RECs over infinite-life RECs and older 5-yr RECs over newer 5-yr RECs, the distribution of REC retirements by resource is highly dependent on the REC type and vintage within each resource. These differences increased the retired RECs from Biglow Canyon Phase 1 and 2 and fewer of the retired RECs to Biglow Canyon Phase 3 and Tucannon River. Retirement of purchased RECs also offset the retirement of Tucannon River RECs.

Resource	2017 Projection from 2016 RPIP	Actual RECs in 2017 Compliance Plan	Deviation from Forecast
Unbundled RECs	0	532,543	532,543
Biglow Canyon Phase 1	88,059	273,833	185,774
Biglow Canyon Phase 2	445,109	776,593	331,484
Biglow Canyon Phase 3	394,941	33,782	(361,159)
Tucannon River	892,764	65,775	(826,918)
Klondike II	217,434	177,802	(39,632)
Vansycle Wind Project	71,163	60,983	(10,180)
Pelton/Sullivan/Round Butte Low-Impact Hydro	438,000	438,000	-
Hydro Upgrades	100,785	103,377	2,592
Bellevue/Yamhill Solar	6,379	2,573	(3,806)
Outback Solar	20,244	9,771	(10,473)
ETO and Other Solar	26,821	32,049	5,228
Biogas	5,143	0	(5,143)
Purchased Bundled	-	139,996	139,996
Total	2,706,840	2,647,077	(59,763)

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:

Incremental Cost of Compliance Bundled RECs		
Resource	No. of RECs (A)	Total Cost (A) * (B)³
Biglow Canyon Phase 1	273,833	\$8,527,981
Biglow Canyon Phase 2	776,593	\$22,826,398
Biglow Canyon Phase 3	33,782	\$1,035,824
Tucannon River	65,775	\$175,751
Purchased Bundled	139,996	\$391,873
TOTAL	1,289,979⁴	\$32,957,827

* Per OAR 860-083-0100(1)(i), incremental costs are deemed to be zero for qualifying electricity from generating facilities or contracts that became operational before June 6, 2007 and for certified low-impact hydroelectric facilities. Therefore, only the RECs from Biglow, Tucannon, and purchased bundled RECs are included in this response. Part 13(a) states if new qualifying electricity in a compliance year totals less than 20 MW, the incremental cost is not required to be included in compliance reports.

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:

PGE's annual revenue requirement for 2017 is: \$1,751,981,218⁵

PGE's total cost of compliance for 2017 is:

$$[2(d) + 2(m)] = \$250,040 + \$32,957,827 = \$33,207,867$$

Cost of compliance as percentage of revenue requirement is:

$$\$33,207,867 / \$1,751,981,218 = \mathbf{1.9\%}$$

³ Incremental cost as calculated in PGE's 2016 Revised RPIP (UM 1788) filed July 15, 2016 (Attachment E).

⁴ Revised number.

⁵ Source: Table 1- Base Rates, Estimated Effect on Customer Total Electric Bills, 2017 COS Only.

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(1) was not reached for the 2017 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:

See Attachment D.

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:

See Footnote 5 on Attachment D.

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:

PGE will comply with this requirement within 30 days of the Commission decision.

OAR 860-083-0350(7)

Consistent with Commission orders for disclosure under OAR 860-038-0300, each electric company subject to ORS 469A.052 and each electricity service supplier subject to ORS 469A.065 must provide information about its compliance report to its customers by bill insert or other Commission-approved method. The information must be provided within 90 days of the Commission decision in section (5) of this rule or coordinated with the next available insert required under OAR 860-038-0300. The information must include the URL address for the compliance reports posted under section (6) of this rule.

Response:

PGE will comply with this requirement within 90 days of the Commission decision.