

June 1, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Attn: Filing Center

**Re: Docket UM _____
PacifiCorp's Renewable Portfolio Standard Oregon Compliance Report for 2015
and Motion for Protective Order**

PacifiCorp d/b/a Pacific Power (PacifiCorp) submits for filing its Renewable Portfolio Standard Oregon Compliance Report for 2015 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 860-001-0070.

The filing also includes a motion for a standard protective order in this matter.

PacifiCorp respectfully requests that all data requests in this docket be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

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

Formal communications concerning this proceeding should be address to the following.

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

Etta Lockey
Senior Counsel
Pacific Power
825 NE Multnomah Street, Suite 1800
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Public Utility Commission of Oregon

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Informal questions concerning this filing may be directed to Erin Apperson, Manager, Regulatory Affairs, at (503) 813-6642.

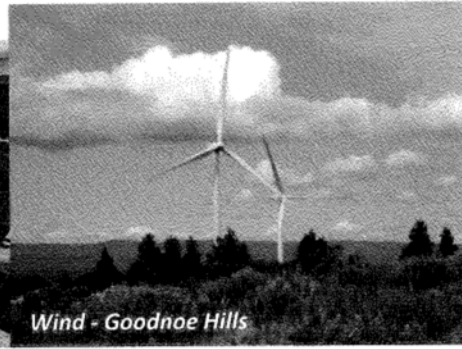
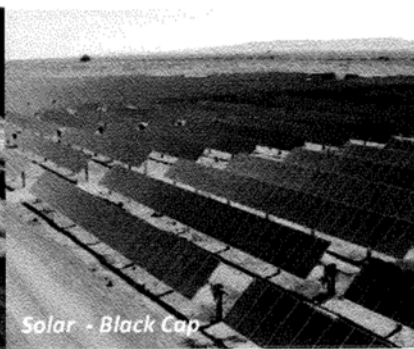
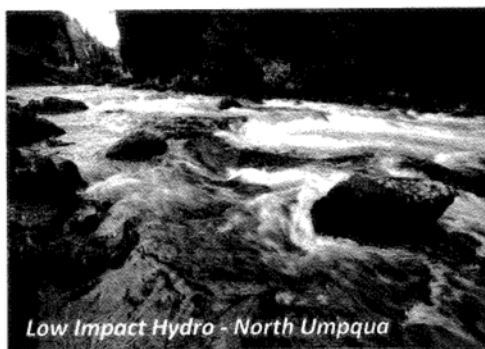
Sincerely,

A handwritten signature in black ink that reads "R. Bryce Dalley/hm". The signature is written in a cursive, flowing style.

R. Bryce Dalley
Vice President, Regulation

Enclosures

cc: UM 1739 Service List



PacifiCorp

**Oregon
Renewable Portfolio Standard
Compliance Report
2015**

June 1, 2016

**PacifiCorp
Renewable Portfolio Standard
Oregon Compliance Report
2015**

Introduction

As required by ORS 469A.170 and OAR 860-083-0350, PacifiCorp, d/b/a. Pacific Power (PacifiCorp or the Company), respectfully submits this 2015 Oregon Renewable Portfolio Standard Compliance Report (2015 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 2015 RPS Compliance Report shows that the Company met the 2015 Oregon RPS target with a combination of 1,929,369 banked bundled and unbundled renewable energy certificates (RECs). In accordance with "first in first out" requirements, the Company used bundled RECs with a vintage of 2010 and 2011 and unbundled RECs with a vintage of 2012 and 2013, from generating facilities certified by the Oregon Department of Energy (ODOE) as RPS-eligible. The generating facilities, either owned by the Company or under contract, are registered in the Western Renewable Energy Generation Information System (WREGIS) and the WREGIS certificates are reported in this 2015 RPS Compliance Report.

As required by ORS 469A.170(e), through 2012, 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 for RPS compliance.

The incremental costs associated with the renewable resources used for 2015 RPS compliance are consistent with the Company's 2017-2021 RPS Implementation Plan (RPIP) filed December 29, 2015. Consistent with the RPIP, using the methodology established by the Commission's rules, the Company's incremental costs for compliance year 2015 do not trigger the four percent cost limit under ORS 469A.100. In Order No. 16-158 in docket UM 1754, the Commission acknowledged PacifiCorp's 2017-2021 RPIP with conditions requiring that PacifiCorp file another RPS Implementation Plan (July RPIP) by July 15, 2016, with analysis of Oregon's Senate Bill 1547-B (SB 1547). SB 1547 was passed on March 8, 2016; therefore, the SB 1547 analysis that will be included in the July RPIP is forward-looking and will not impact this 2015 RPS Compliance Report.

ORS 757.370(1) previously required that by January 1, 2020, the total solar photovoltaic generating nameplate capacity of all electric companies in Oregon be at least 20 MW_{AC}, of which PacifiCorp was to acquire 8.7 MW_{AC}. To-date, PacifiCorp has acquired 7 MW_{AC} of solar to meet

the requirement.¹ However, SB 1547 eliminated the solar capacity standard set forth by ORS 757.370(1).

This RPS Compliance report is based on and consistent with PacifiCorp's annual FERC Form 1 filings (annual retail sales and annual megawatt-hour generation) and Oregon's allocation of system resources as determined using the Company's 2010 Protocol allocation method.

2015 RPS Compliance Report

The following information is provided in response to the requirements of OAR-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 12,862,461 megawatt-hours were sold to Oregon retail consumers in 2015.

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 are no bundled or unbundled certificates acquired in compliance year 2015 that are used to meet the renewable portfolio standard requirement for compliance year 2015.

OAR 860-083-0350(2)(c)
The total number 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, 2016 and March 31, 2016 that are used to meet the renewable portfolio standard for compliance year 2015.

¹ In October 2012, the Company acquired the Black Cap Solar project (Black Cap) in Lakeview, Oregon and in April 2016, the 5.0 MW_{AC} Old Mill Solar project (Old Mill) located in Bly, Oregon, became operational. RECs generated through Black Cap earn double credit towards PacifiCorp's RPS compliance.

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:

PacifiCorp acquired 600,000 unbundled RECs in 2013, which were used to meet the renewable portfolio standard as shown below:

Table 1	
Compliance Year	Number of Unbundled RECs
2012	127,788
2013	130,899
2014	129,587
2015	211,726

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 2015 is 1,717,643.

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 1,333,863 bundled certificates issued in the compliance year 2015 that are banked for the RPS requirement for Oregon.

As of this filing, there are 19,929 bundled certificates issued in compliance year 2015 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 Attachment B.

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:

Most of Oregon's share of RECs is banked for RPS compliance; however, not all RECs meet the Oregon RPS qualifications. The Company is a multi-state utility which allocates a portion of its renewable resources based on a state allocation process. 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 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.

Table 2 – Bundled RECs

Energy Source	Generating Facility	Resource Type ²	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 ³	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 ⁴	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	
	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	

²

QF = Qualifying Facility

PPA = Power Purchase Agreement

SVP = Solar Volumetric Project

ETO = Energy Trust of Oregon Funded Project

³ Chevron Casper Wind is currently under a short-term QF PPA while a longer term agreement is being negotiated.

⁴ 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 ²	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	
	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	
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			
	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}	
Solar	Willamette Valley (WV 1)	SVP	Marion, Benton, Linn, Lane, Polk	OR	2010	15 Years	.227 ^{AC}	100%
	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}	
	Willamette Valley (WV 2)	SVP	Benton, Linn, Polk, Lane, Marion	OR	2011		.243 ^{AC}	
	Columbia River (CR 1)	SVP	Hood River, Morrow, Mosier	OR	2011		.214 ^{AC}	

Table 2 – Bundled RECs

Energy Source	Generating Facility	Resource Type ²	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Solar	Joseph Community Solar	SVP	Wasco, Sherman	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	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	
Solar	Black Cap**	Utility Owned	Lake	OR	2012	16 Years	2.0 AC	100%

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

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
	COID - Siphon Power	ETO	Deschutes	OR	1989		5.4	Comment
	FID - Copper Dam Plant	ETO	Hood River	OR	1986	Not Applicable	3	and Table
	COID - Juniper Ridge Hydro	ETO	Deschutes	OR	2010		5	4 Below
	FID - Peters Drive Dam	ETO	Hood River	OR	1987		1.8	
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 AgPower Jerome	PPA PPA	Jackson Jerome	OR ID	2013 2013	Not Applicable	Not Applicable	Not Applicable
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			
	Foot 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			
Hydro - Incremental	Red Mesa	PPA	Cibola	NM	2013			
	Rocky Reach Hydroelectric Project - C11	PPA	Chelan	WA	2013	Not Applicable	Not Applicable	Not Applicable

Resources listed in Table 2, with the exception of those associated with the Oregon Solar Incentive Program, Black Cap Solar project, and Old Mill Solar project are system resources. Resource costs are allocated on dynamic factors. For years 2007 through 2015, 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	2014	2015
27.44%	28.19%	27.49%	26.20%	25.81%	25.93%	25.20%	25.51%	25.47%

RECs associated with Combine Hills and other ETO-funded projects are assigned to the Energy Trust of Oregon 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.

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:

The Company 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:

The Company 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 2015. Upon Commission approval of the 2015 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:

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 renewable energy certificates used to meet the renewable portfolio standard for compliance year 1,929,369 015 is 647,937.

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 2015, per the Company's compliance filing for OAR 860-083-0200 submitted on November 14, 2014 and the Company's total cost of compliance for 2015.

Table 5			
Compliance Year	Oregon Allocated Nominal Levelized Incremental Cost (\$000s)	4% of Oregon Annual Revenue Requirement (\$000s)	% Oregon Annual Revenue Requirement Threshold
2015	\$ 3,456	\$50,452	0.27%

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 2015 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.
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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 2014. The amount of RECs is subject to change if any additional renewable resources are certified with the Oregon Department of Energy.

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:

The new qualifying resources since the last compliance report are:

Table 6 – New Added Resources

Energy Source	Generating Facility	Resource Type ⁵	County	State	Commercial Operation Year or First Year Contract
Solar	Bourdet	SVP	Klamath	OR	2014
	Willamette Valley (WV 8)	SVP	Linn, Polk	OR	2015
	Willamette Valley (WV 9)	SVP	Linn, Marion	OR	2015

For details on number of RECs and cost information, see Confidential 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:

The Company 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 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:

The Company 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 required under OAR 860-038-0300.

⁵ QF = Qualifying Facility
PPA = Power Purchase Agreement
SVP = Solar Volumetric Project
ETO = Energy Trust of Oregon Funded Project

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PACIFICORP D/B/A PACIFIC POWER

2015 Renewable Portfolio Standard
Compliance Report.

Motion for Protective Order by PacifiCorp
d/b/a Pacific Power

1 Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power
2 (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for
3 entry of a standard protective order in this proceeding. Good cause exists to issue a
4 protective order to protect commercially sensitive and confidential business information
5 related to the Company's renewable portfolio standard (RPS) compliance position and
6 strategies.

7 The Commission's rules authorize PacifiCorp to seek reasonable restrictions on
8 discovery of trade secrets and other confidential business information.¹ The Commission's
9 standard protective order is designed to allow the broadest possible discovery consistent with
10 the need to protect confidential information.² PacifiCorp expects to receive discovery
11 requests related to this report, including requests for propriety cost data and models,
12 commercially sensitive pricing information, confidential market analyses and business
13 projections, or confidential information regarding contracts for the purchase or sale of

¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information"). See also *In re Investigation into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect "the rights of a party to trade secrets and other confidential commercial information" and "to facilitate the communication of information between litigants").

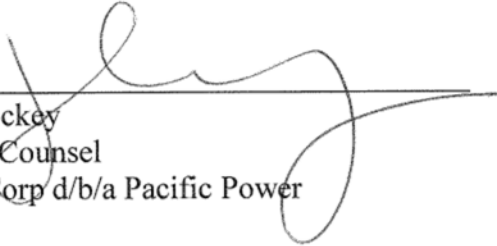
² OAR 860-001-0080(2).

1 electric power, power services, or fuel. PacifiCorp will be exposed to competitive injury if it
2 is forced to make unrestricted disclosure of its confidential business information.

3 It is also substantially likely that the parties to these proceedings will seek to discover
4 further information held by PacifiCorp, including confidential business information. Issuance
5 of a protective order will facilitate the production of relevant information and expedite the
6 discovery process.

7 For these reasons, PacifiCorp respectfully requests that the Commission enter its
8 standard protective order in this docket. The Company requests expedited consideration of
9 this motion to allow parties who execute the protective order to obtain prompt responses to
10 discovery requests.

Respectfully submitted this 1st day of June, 2016.



Etta Lockey
Senior Counsel
PacifiCorp d/b/a Pacific Power

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's RPS Plan on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

SERVICE LIST UM 1739

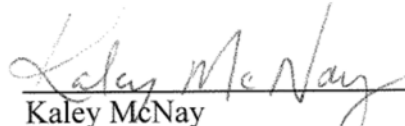
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Dated this 1st of June, 2016.


Kaley McNay
Senior Coordinator, Regulatory Operations

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2015**

Attachment A

**CONFIDENTIAL
2015 RPS Compliance
RECs and Cost Information**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2015**

Attachment B

**CONFIDENTIAL
Banked Bundled and Unbundled RECs**

THIS ATTACHMENT IS
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PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2015**

Attachment C

**CONFIDENTIAL
2015 RPS Compliance
WREGIS Certificates**

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SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2015**

Attachment D

**CONFIDENTIAL
Vintage 2007 – Vintage 2015
RECs and Cost Information**

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SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2015**

Attachment E

**2015 RPS Compliance
REC Summary**

**PacifiCorp
Renewable Portfolio Standard
Attachment E – Compliance REC Summary
Oregon Compliance Report
2015**

The bundled and unbundled RECs to be retired for PacifiCorp's 2015 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 2015 Renewable Portfolio Standard
Aggregated Data**

BUNDLED RECS		VINTAGE YEAR			
RESOURCE TYPE	LOCATION	2010	2011	2012	2013
BIOGAS	UT		1,974		
GEO THERMAL	UT	10,512	9,327		
HYDRO - LOW IMPACT	CA, ID, MT, OR, UT, WA	162,232	194,793		
SOLAR	OR	24	307		
WIND	ID, OR, WA, WY	620,274	718,200		
BUNDLED TOTAL		793,042	924,601		

UNBUNDLED RECS		VINTAGE YEAR			
RESOURCE TYPE	LOCATION	2010	2011	2012	2013
BIOGAS	ID, OR			2,000	18,337
HYDRO - INCREMENTAL	WA			25,449	28,567
WIND	OR, WA, WY			79,387	57,986
UNBUNDLED TOTAL				106,836	104,890

TOTAL 2015 RECs	1,929,369
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