

August 11, 2021

***VIA ELECTRONIC FILING***

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

**RE: UM 2171—PacifiCorp’s Renewable Portfolio Standard Oregon Compliance Report for 2020 – Updated Narrative and Confidential Attachments B and D**

On June 1, 2021, PacifiCorp d/b/a Pacific Power submitted for filing with the Public Utility Commission of Oregon (Commission) its Renewable Portfolio Standard Oregon Compliance Report for 2020 in accordance with ORS 469A.170 and OAR 860-083-0350. Subsequent to the filing, while preparing a response to a staff issued data request, PacifiCorp became aware of an error in Confidential Attachments B and D. In this filing PacifiCorp submits an updated narrative and Confidential Attachments B and D. Confidential information in this filing is provided in accordance with General Protective Order No. 21-169 issued May 28, 2021.

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](mailto:oregondockets@pacificorp.com)

Riley Peck  
Associate Attorney  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[Riley.Peck@pacificorp.com](mailto:Riley.Peck@pacificorp.com)

Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com).

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


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

Sincerely,

A handwritten signature in cursive script that reads "Shelley McCoy".

Shelley McCoy

Director, Net Power Costs & Regulatory Policy

Enclosures

cc: UM 2171 Service List



**PacifiCorp**

**Oregon  
Renewable Portfolio Standard  
Compliance Report  
2020  
CORRECTED**

**August 11, 2021**

**PacifiCorp  
Renewable Portfolio Standard  
Oregon Compliance Report  
2020**

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## **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 2020 Oregon Renewable Portfolio Standard Compliance Report (2020 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 2020 RPS Compliance Report shows that PacifiCorp met the 2020 Oregon RPS target with **2,583,515** bundled renewable energy certificates (RECs). PacifiCorp used bundled RECs with a vintage of **2011, 2012, 2013, 2014, 2019, and 2020**, 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 2020 RPS Compliance Report.

In accordance with ORS 469A.170(2)(e), through 2020, 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 banked **2013 and 2014** vintage OSIP RECs as well as **2020** vintage OSIP RECs.

The Company has calculated the incremental costs for the RECs that will be used for the 2020 compliance requirement and the total cost of RECs for 2007 through 2020. The incremental costs associated with the renewable resources used for 2020 RPS compliance are consistent with PacifiCorp's 2021-2023 Renewable Portfolio Implementation Plan (RPIP),<sup>1</sup> the applicable RPIP for compliance year 2020. Consistent with the 2021-2023 acknowledged RPIP, using the methodology established by the Commission's rules, PacifiCorp's incremental costs for compliance year 2020 do not trigger the four percent cost limit under ORS 469A.100.

## **2020 RPS Compliance Report**

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

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<sup>1</sup> 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 **12,993,459** megawatt-hours were sold to Oregon retail consumers in 2020. The Company subtracted **75,883** megawatt-hours of Oregon Direct Access load served by electricity service suppliers to whom PacifiCorp transferred the associated 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 **205,926** unbundled certificates were acquired in 2020. No unbundled certificates acquired in 2020 were used to meet the RPS in compliance year 2020. A total of **2,007,751** bundled certificates were acquired in the compliance year. Of those, **26,087** bundled certificates were used to meet the RPS requirement for compliance year 2020<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, 2021, and March 31, 2021, were used to meet the RPS for compliance year 2020.

**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 2020 is **0**.

For cost and detail by facility, see Confidential Attachment A.

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<sup>2</sup> Includes **10,373** RECs transferred from the Energy Trust of Oregon (ETO) and **15,714** RECs associated with the OSIP.

**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 2020 is **2,557,428<sup>3</sup>**. ETO projects provided **10,373** vintage 2020 RECs for 2020 compliance, per their ETO funding agreements and **15,714** vintage 2020 OSIP RECs. The Company does not treat those as banked because they were acquired in compliance year 2020.

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 **1,981,664** bundled certificates issued in the compliance year 2020 that are banked for the RPS requirement for Oregon.

As of this filing, there are **205,926** unbundled certificates issued in compliance year 2020 that are banked for the RPS requirement for Oregon.

As of this filing, there are **0** bundled certificates issued in compliance year 2020 that were transferred from the 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
N/A	N/A

<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.

<b>OAR 860-083-0350(2)(h)</b>
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)
<b>Biogas</b>	Hill Air Force Base	QF	Davis	UT	2005	20 years	2.457	
<b>Geothermal</b>	Blundell II	Utility Owned	Beaver	UT	2007	Not Applicable	12	
<b>Wind</b>	Campbell Hill-Three Buttes	PPA	Converse	WY	2009	20 years	99	See Comment and Table 4 Below
	Chevron Casper Wind <sup>5</sup>	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	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	
	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		
Top of the World	PPA	Converse	WY	2010	20 years	200.2		
Wolverine Creek	PPA	Bonneville	ID	2005	20 years	64.5		

<sup>4</sup> QF = Qualifying Facility  
 PPA = Power Purchase Agreement  
 SVP = Solar Volumetric Project  
 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)
<b>Hydro-Low Impact</b>	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			
<b>Hydro - Incremental</b>	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			
<b>Solar</b>	Central Oregon (CO 1)	SVP	Jefferson, Deschutes, Crook	OR	2010		.209 <sub>AC</sub>	
	Eastern Oregon (EO 1)	SVP	Umatilla, Wallowa	OR	2010		.211 <sub>AC</sub>	
	Portland Oregon (PO 1)	SVP	Multnomah, Clatsop	OR	2010		.249 <sub>AC</sub>	
	Willamette Valley (WV 1)	SVP	Marion, Benton, Linn, Lane, Polk	OR	2010		.227 <sub>AC</sub>	
	Southern Oregon (SO 1)	SVP	Jackson, Josephine, Klamath, Coos	OR	2010		.25 <sub>AC</sub>	
	Southern Oregon (SO 2)	SVP	Jackson, Josephine, Klamath, Coos	OR	2011		.265 <sub>AC</sub>	
	Central Oregon (CO 2)	SVP	Deschutes, Crook, Jefferson	OR	2011		.243 <sub>AC</sub>	
	Southern Oregon (SO 3)	SVP	Klamath, Lake, Jackson	OR	2011		.243 <sub>AC</sub>	

**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)
	Willamette Valley (WV 2)	SVP	Benton, Linn, Polk, Lane, Marion	OR	2011	15 years	.243 <sub>AC</sub>	100%
	Columbia River (CR 1)	SVP	Hood River, Morrow, Mosier	OR	2011		.214 <sub>AC</sub>	
	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 <sub>AC</sub>		
	Southern Oregon (SO5)	SVP	Klamath, Jackson, Lincoln	OR	2012	.248 <sub>AC</sub>		
	Willamette Valley (WV 3)	SVP	Linn, Marion, Benton, Polk	OR	2012	.247 <sub>AC</sub>		
	Lakeview	SVP	Lake	OR	2012	.363 <sub>AC</sub>		
	Solwatt	SVP	Umatilla	OR	2012	.307 <sub>AC</sub>		
	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 <sub>AC</sub>		
	Willamette Valley (WV 4)	SVP	Benton, Linn	OR	2013	.251 <sub>AC</sub>		
	Willamette Valley (WV 5)	SVP	Linn, Marion, Benton, Polk	OR	2013	.251 <sub>AC</sub>		
	Willamette Valley (WV 6)	SVP	Linn, Marion, Benton, Polk	OR	2013	.251 <sub>AC</sub>		
	Crook County	SVP	Crook	OR	2013	.411 <sub>AC</sub>		
	Southern Oregon (SO 8)	SVP	Klamath, Jackson, Josephine	OR	2013	.221 <sub>AC</sub>		
	Southern Oregon (SO 9)	SVP	Jackson	OR	2013	.061 <sub>AC</sub>		
	Portland Oregon (PO 2)	SVP	Multnomah, Clatsop	OR	2013	.121 <sub>AC</sub>		
	Central Oregon (CO3)	SVP	Deschutes, Jefferson, Crook	OR	2013	.201 <sub>AC</sub>		
	Willamette Valley (WV 7)	SVP	Marion, Benton, Linn, Polk	OR	2014	.007 <sub>AC</sub>		
	Solwatt II	SVP	Umatilla	OR	2014	.168 <sub>AC</sub>		
	Powell Butte Solar	SVP	Crook	OR	2014	.164 <sub>AC</sub>		
	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 <sub>AC</sub>		
	Columbia River (CR 2)	SVP	Wasco	OR	2014	.009 <sub>AC</sub>		
	CTWS (Tribes W. Springs)	SVP	Jefferson	OR	2014	.254 <sub>AC</sub>		
	Bourdet 5713351	SVP	Klamath	OR	2014	.084 <sub>AC</sub>		
	Willamette Valley (WV 8)	SVP	Linn, Polk	OR	2015	.203 <sub>AC</sub>		
	Willamette Valley (WV 9)	SVP	Linn, Marion	OR	2015	.047 <sub>AC</sub>		
	Southern Oregon (SO 12)	SVP	Klamath, Jackson	OR	2015	.245 <sub>AC</sub>		
	Bourdet 5903801	SVP	Klamath	OR	2016	.084 <sub>AC</sub>		
	Central Oregon (CO 4)	SVP	Deschutes	OR	2016	.034 <sub>AC</sub>		
	Eastern Oregon (EO 3)	SVP	Crook, Deschutes	OR	2016	.225 <sub>AC</sub>		

**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)
	Portland Oregon (PO 3)	SVP	Multnomah	OR	2016		.103 <sub>AC</sub>	
	Southern Oregon (SO 13)	SVP	Klamath	OR	2016		.009 <sub>AC</sub>	
	Willamette Valley (WV 10)	SVP	Marion, Linn	OR	2017		.034 <sub>AC</sub>	SG
	Keeton 1	SVP	Klamath	OR	2016		.085 <sub>AC</sub>	
	Keeton 2	SVP	Klamath	OR	2016		.085 <sub>AC</sub>	
	Hammerich 1	SVP	Klamath	OR	2016		.085 <sub>AC</sub>	
	Hammerich 2	SVP	Klamath	OR	2016		.085 <sub>AC</sub>	
<b>Solar</b>	Adams Solar	QF	Jefferson	OR	2018	20 years	10.0 <sub>AC</sub>	CAGW <sup>6</sup>
	Bear Creek Solar	QF	Deschutes	OR	2018	20 years	10.0 <sub>AC</sub>	CAGW <sup>7</sup>
	Bly Solar	QF	Klamath	OR	2018	20 years	8.50 <sub>AC</sub>	CAGW <sup>8</sup>
	Elbe Solar	QF	Jefferson	OR	2018	20 years	10.0 <sub>AC</sub>	CAGW <sup>9</sup>
	Black Cap**	Utility Owned	Lake	OR	2012	16 years	2.0 <sub>AC</sub>	100%
	Pavant	QF	Millard	UT	2015	10 years	50.0 <sub>AC</sub>	CAGW <sup>10</sup>
	Pavant II	QF	Millard	UT	2016	10 years	50.0 <sub>AC</sub>	SG
	Enterprise	QF	Iron	UT	2016	10 years	80.0 <sub>AC</sub>	CAGW <sup>11</sup>
	Sage Solar I	QF	Lincoln	WY	2019	20 years	20.0 <sub>AC</sub>	SG
	Sage Solar II	QF	Lincoln	WY	2019	20 years	20.0 <sub>AC</sub>	SG
	Sage Solar III	QF	Lincoln	WY	2019	20 years	17.6 <sub>AC</sub>	SG
Sweetwater Solar	QF	Sweetwater	WY	2018	20 years	80.00 <sub>AC</sub>	SG	

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

<sup>6</sup> Oregon receives its Control Area Generation West (CAGW) share of this resource, which is treated partially as bundled and partially as unbundled.

<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>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>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>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>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>6</sup>	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 Comment and Table 4 Below
	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	
	FID - Peters Drive Dam	ETO	Hood River	OR	1987		1.8	
	Swalley Irrigation District	ETO	Deschutes	OR	2010		0.75	
	City of Astoria – Bear Creek	ETO	Clatsop	OR	2015	Not Applicable	0.03	
	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**

<b>Energy Source</b>	<b>Generating Facility</b>	<b>Resource Type<sup>6</sup></b>	<b>County</b>	<b>State</b>	<b>First Year Contract</b>	<b>Duration</b>	<b>Nominal Capacity (MW)</b>	<b>OR Share Nameplate (MW)</b>
<b>Biogas</b>	Dry Creek Landfill	PPA	Jackson	OR	2013	Not Applicable	Not Applicable	Not Applicable
	AgPower Jerome	PPA	Jerome	ID	2013			
<b>Wind</b>	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				
<b>Hydro - Incremental</b>	Rocky Reach Hydroelectric Project - C11	PPA	Chelan	WA	2013	Not Applicable	Not Applicable	Not Applicable
<b>Solar</b>	Pavant	QF	Millard	UT	2015	10 years	Not Applicable	Not Applicable
	Enterprise	QF	Iron	UT	2016	10 years		
	Adams	QF	Jefferson	OR	2018	20 years		
	Bear Creek	QF	Deschutes	OR	2018	20 years		
	Bly	QF	Klamath	OR	2018	20 years		
	Elbe	QF	Jefferson	OR	2018	20 years		

Resources listed in Table 2—with the exception of 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 years 2007 through 2020, the following system generation allocation factors were used to allocate the RECs associated with the system resources:

<b>Table 4</b>						
<b>2017 Protocol Allocation Method - Oregon</b>						
<b>System Generation Factor</b>						
<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
27.44%	28.19%	27.49%	26.20%	25.81%	25.93%	25.20%
<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
25.51%	25.47%	26.62%	25.77%	26.06%	26.32%	27.14%

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.

<b>OAR 860-083-0350(2)(i)</b>
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.

<b>OAR 860-083-0350(2)(j)</b>
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 2020. Upon Commission approval of the 2020 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 2020 RPS Compliance Report is consistent with the 2021-2023 RPIP acknowledged by the Commission. There are no material deviations from the applicable implementation plan filed under OAR 860-083-0400. In the 2021-2023 RPIP, 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. This is consistent with the Company's approach to compliance in 2020. Additionally, in the 2020 RPS Compliance Report, the Company responded to concerns expressed by staff and stakeholders about intergenerational equity associated with the Company's REC bank. PacifiCorp is meeting a portion of its 2020 compliance requirement with older-vintage banked RECs. The Company will continue to prioritize a shortest-life-first retirement strategy to ensure customers retain all value associated with renewable investments and appropriately account for future uncertainty. There are no other material deviations in this 2020 RPS Compliance Report 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 2020 is **2,583,515**.

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 2020, consistent with PacifiCorp’s compliance filing under OAR 860-083-0200 submitted on November 15, 2019, and the Company’s total cost of compliance for 2020. PacifiCorp’s 2020 incremental cost of compliance as a percentage of annual revenue requirement does not exceed the threshold of four percent of annual revenue requirement.

<b>Table 5</b>				
<b>Compliance Year</b>	<b>Oregon Allocated Nominal Levelized Incremental Cost (\$000s)</b>	<b>2020 Revenue Requirement (\$000s)</b>	<b>4% of Oregon Annual Revenue Requirement (\$000s)</b>	<b>% Oregon Annual Revenue Requirement Threshold</b>
2020	\$15,851	1,319,876	\$52,795	1.2%

**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 2020 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 2020. The amount 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:**

The Company did not use RECs from any new resources since the last compliance report.

**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  
2020  
CORRECTED**

**Attachment B**

**CONFIDENTIAL  
Banked RECs – 2020 Vintage**

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

**PacifiCorp  
Renewable Portfolio Standard Oregon  
Compliance Report  
2020  
CORRECTED**

**Attachment D**

**CONFIDENTIAL  
Vintage 2007 – Vintage 2020  
RECs and Cost Information**

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

## CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of **PacifiCorp's Renewable Portfolio Standard Oregon Compliance Report for 2020 – Updated Narrative and Confidential Attachments B and D** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

### SERVICE LIST UM 2171

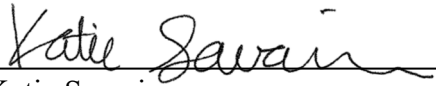
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Dated this 11<sup>th</sup> day of August, 2021.

  
\_\_\_\_\_  
Katie Savarin  
Coordinator, Regulatory Operations