

August 30, 2021

***VIA ELECTRONIC FILING***

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**RE: Advice 21-09— Proposing Revisions to the Blue Sky Program Tariffs Schedule 70 (Renewable Energy Rider – Optional) and Schedule 73 (Renewable Energy Rider – Optional Bulk Purchase Option)**

PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) submits the following proposed tariff sheets in compliance with RCW 80.28.050, WAC Chapter 480-80-121. The proposed tariff revisions would modify Schedule 70 and Schedule 73 to revise the definition of one block of renewable energy from 200 kilowatt-hours (kWh) to 100 kWh. PacifiCorp respectfully requests an effective date of January 1, 2022.

Second Revision of Sheet No. 70.1	Schedule 70	Renewable Energy Rider – Optional
Second Revision of Sheet No. 73.1	Schedule 73	Renewable Energy Rider – Optional Bulk Purchase Option

**Background**

PacifiCorp launched its Blue Sky program in 2000 to allow customers the option to purchase renewable energy credits (RECs) to offset some or all of their usage from renewable energy sources while also supporting renewable energy development. Funds collected through the Blue Sky Schedules are used to acquire RECs and cover program expenses. Any remaining funds are then used to help support new community-based renewable energy projects. Since its inception, Blue Sky customers across PacifiCorp’s service territories have purchased more than 10 billion kWh of renewable energy and supported more than 300 community-based renewable projects. In addition to the support from customers, the Blue Sky program has been recognized by the National Renewable Energy Laboratory on its Top 10 Utility Green Power Pricing Programs list for 19 years.

PacifiCorp currently has approximately 5,600 participating Blue Sky Block customers in Washington. Since 2020, Blue Sky customers have paid \$1.95 for each 200 kWh block.

**Filing Overview**

The price of RECs from 2012-2019 was stable. This helped inform the Company’s decision to file an advice filing on October 21, 2019, requesting approval to increase the size of each Blue

Sky block from 100 kWh to 200 kWh of renewable energy while maintaining the current price of \$1.95 per block.<sup>1</sup> This was an effort to meet growing customer demands in the renewable energy sector and to better align with market conditions for REC prices.<sup>2</sup> The Company's filing was allowed to become effective at the December 19, 2019 open meeting.

Since 2020, however, the price of RECs has increased to a point where it is unsustainable for the program to maintain the size of each block at 200 kWh. Accordingly, the Company requests to reduce the size of each block back to 100 kWh to reflect the market fluctuation.

It is respectfully requested that all formal correspondence and data requests regarding this filing be addressed to:

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

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

Please direct any informal inquiries regarding this filing to Ariel Son at (503) 813-5410.

Sincerely,

                  /s/                    
Shelley McCoy  
Director, Regulation  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
(503) 813-5292  
[shelley.mccoy@pacificorp.com](mailto:shelley.mccoy@pacificorp.com)

Enclosures

21-09-PAC-Attach-A-8-30-21  
21-09-PAC-Attach-B-8-30-21

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<sup>1</sup> Docket No. UE-190874.

<sup>2</sup> The proposed increase to standard block size did not alter individually negotiated contracts, including any contracts that were currently in place to facilitate direct purchase of RECs or any future individually negotiated agreements.

# **Attachment A**

The proposed tariff sheets to be revised in PacifiCorp dba Pacific Power & Light Company's currently effective Tariff WN U-76 are designated as follows:

Second Revision of Sheet No. 70.1	Schedule 70	Renewable Energy Rider – Optional
Second Revision of Sheet No. 73.1	Schedule 73	Renewable Energy Rider – Optional Bulk Purchase Option

# **Attachment B**

**Schedule 70**  
**RENEWABLE ENERGY RIDER—OPTIONAL**

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AVAILABLE:

In all territory served by Company in the State of Washington.

APPLICABLE:

To Customers receiving service under the Company's electric rate Schedules.

ADMINISTRATION:

Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program cost and matching Renewable Energy purchases may be used to fund Qualifying Initiatives as defined below.

BLOCK:

1 block equals 100 kWh of Renewable Energy.

(C)

CHARGE PER BLOCK:

\$1.95 per month

MONTHLY BILL:

The Monthly Bill shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block. The Monthly Bill is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Monthly Bill shall be applied to the Customer's billing regardless of actual energy consumption.

RENEWABLE ENERGY:

Renewable Energy includes bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;
- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;
- pipeline or irrigation canal hydroelectric systems;
- wave or tidal action; and
- low emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol or copper chrome arsenic.

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**Issued:** August 30, 2021  
**Advice No.** 21-09

**Effective:** January 1, 2022

**Issued By** PacifiCorp d/b/a Pacific Power & Light Company

By:  Etta Lockey

**Title:** Vice President, Regulation

**Schedule 73**  
**RENEWABLE ENERGY RIDER—OPTIONAL BULK PURCHASE OPTION**

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AVAILABLE:

In all territory served by Company in the State of Washington.

APPLICABLE:

To non-residential Customers receiving service under the Company's electric rate Schedules.

ADMINISTRATION:

Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases to Block purchases may be used to fund Qualifying Initiatives as defined below.

BLOCK:

1 Block equals 100 kWh of Renewable Energy. This program requires a minimum purchase of 1,212 Blocks per year. For the purpose of qualifying for this Schedule, Customers with multiple sites can sum their Block purchases across all Pacific Power & Light Company and Rocky Mountain Power service territories to meet the minimum purchase requirement. (C)

CHARGE PER BLOCK:

\$0.70 per month per 100 kWh block Plus (C)  
\$1,500.00 per year fixed charge

For purchase commitments over two years in length or large purchases over 75,000 MWh per year, individually negotiated contracts may be available, pursuant to the execution of a written contract.

CHARGE:

The Charge can be billed either monthly, twice yearly or annually and shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block, plus the \$1,500.00 yearly fixed charge divided between the Customer's billing choice (monthly, twice yearly or annually) and added to the Customer's standard bill. The Charge is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Charge shall be applied to the Customer's billing regardless of actual energy consumption.

RENEWABLE ENERGY:

Renewable Energy includes bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;
- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;


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