

June 1, 2015

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Public Utility Commission of Oregon
3930 Fairview Industrial Dr. S.E.
Salem, OR 97302-1166

Attn: Filing Center

**Re: Docket UM _____
PacifiCorp's Renewable Portfolio Standard Oregon Compliance Report for 2014
and Motion for Protective Order**

PacifiCorp d/b/a Pacific Power (PacifiCorp) submits for filing its Renewable Portfolio Standard Oregon Compliance Report for 2014 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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(503) 813-5701
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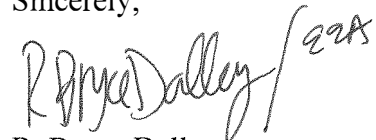
Public Utility Commission of Oregon

June 1, 2015

Page 2

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

Sincerely,

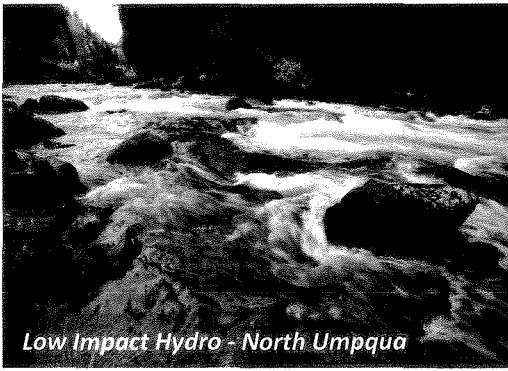


R. Bryce Dalley

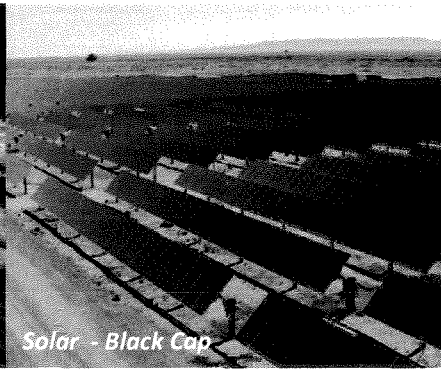
Vice President, Regulation

Enclosures

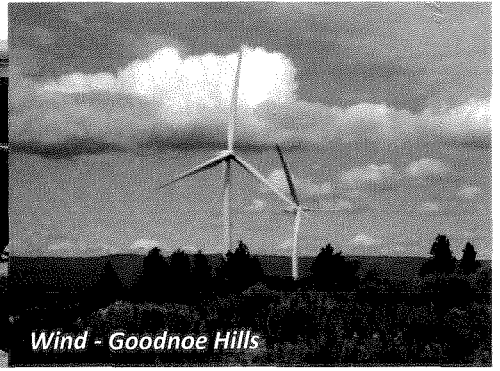
cc: UM 1700 Service List



Low Impact Hydro - North Umpqua



Solar - Black Cap



Wind - Goodnoe Hills

PacifiCorp

Oregon Renewable Portfolio Standard Compliance Report 2014

June 1, 2015

**PacifiCorp
Renewable Portfolio Standard
Oregon Compliance Report
2014**

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 2014 Oregon Renewable Portfolio Standard Compliance Report (the 2014 RPS Compliance Report) to the Public Utility Commission of Oregon (Commission), for meeting 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 2014 RPS Compliance Report shows that the Company met the 2014 Oregon RPS target with a combination of 647,937¹ banked bundled renewable energy certificates (RECs) and unbundled RECs. The Company used RECs with a vintage of 2009, 2010, 2011 and 2012 and did not use any RECs associated with generation from January 2015 through March 2015. The Company used RECs from generating facilities that are certified by the Oregon Department of Energy (ODOE) as eligible for the Oregon RPS program. 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 2014 RPS Compliance Report.

The Company calculated the incremental costs for the associated bundled RECs that were used for the 2014 compliance requirement and the total cost of RECs for 2007 through 2014. The costs for the renewable resources are consistent with the Company’s 2015-2019 RPS Implementation Plan (RPIP) filed December 27, 2013. In Order No. 14-267 in docket UM 1681, the Commission acknowledged PacifiCorp’s 2015-2019 RPIP. The 2014 RPS Compliance Report shows that, using the methodology established by the Commission’s rules², the Company’s incremental costs do not trigger the four percent cost limit under ORS 469A.100.

Pursuant to ORS 469.170(d) and (f),³ the Company uses its Integrated Resource Plan (IRP) to determine the preferred resources to meet the Company’s needs over the long-term planning

¹ Consistent with Commission Order No. 13-420 in docket UM 1660, the Company is providing a summary of the resource type, location and vintage year of RECs that will be used to meet the RPS obligation for a compliance year. Please refer to Attachment E – CY2014 REC Summary, for 2014 aggregate data.

² In Order No. 14-034 in docket UM 1616, the Commission adopted a stipulation resolving several issues related to the incremental cost calculation methodology and the Company’s incremental costs included in this report are consistent with stipulation adopted by Order No. 14-034.

³ ORS 469A.170(d) directs the Commission to consider “[w]hether the actions taken by the company or supplier are contributing to long term development of generating capacity using renewable energy sources; ORS 469A.170(f) directs the Commission to consider “[g]ood faith forecasting differences associated with the projected number of retail electricity consumers served and the availability of electricity from renewable energy sources.”

horizon considering cost, risk and planning uncertainty. Included in the IRP are forecasts of the expected retail customers and retail loads, alternative load forecast scenarios, and detailed production cost modeling that captures the impact of random fluctuations in loads. In addition, the Company conducts resource portfolio analysis based on different RPS scenarios over the long-term planning horizon. More information on the resource additions and the Oregon RPS long-term compliance forecast in the Company's 2015 IRP can be found at: <http://www.pacificorp.com/es/irp.html>.

Pursuant to ORS 469A.170 (e), through 2012, PacifiCorp has 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 has included renewable resources associated with the Oregon Solar Incentive Program.

The Company examined low-cost and low-risk approaches to meeting Oregon RPS requirements in the Company's 2015 IRP. The preferred portfolio relies on purchases of unbundled RECs assuming a sufficient number will be available under the break-even REC price of \$18. The preferred portfolio does not add new renewable resources solely to meet state RPS obligations until 2028. In addition to the unbundled REC strategy, the forecast REC need has declined due to the reduction in load forecast.

On December 31, 2012, the Company issued a request for proposals (RFP) to solicit offers for the sale of unbundled RECs from generation facilities certified by the ODOE as RPS-eligible. The Company specified proposals be for delivery of RECs generated between January 1, 2007 through December 31, 2015, with the understanding that any RECs purchased by the Company through this process that are not eligible for retirement in 2012 would be bankable per ORS 469A.140. As a result of the unbundled REC RFP on December 31, 2012, PacifiCorp acquired 600,000 unbundled RECs in 2013. The Company's purchase of unbundled RECs contributes to a cost-effective strategy to meet the Oregon RPS.

ORS 757.370(1) requires that, by January 1, 2020, the total solar photovoltaic generating nameplate capacity of all electric companies in Oregon be at least 20 MW_{AC} from qualifying systems generating at least 500 kW_{AC} but no more than 5 MW_{AC}. To comply with this standard, as established by OAR 860-084-0020, PacifiCorp must acquire a minimum of 8.7 MW_{AC} of the total 20 MW_{AC} before January 1, 2020. PacifiCorp may satisfy the solar photovoltaic generating capacity standard with systems owned by the Company or with power purchase agreements (PPA) with qualifying systems. All costs prudently incurred to comply with the solar photovoltaic generating capacity standard are recoverable in rates.

Electricity produced by qualified solar projects under ORS 757.375 may be used to comply with the RPS established in ORS 469A.005 to 469A.210, and each MWh generated by a project over 500 kW_{AC} that became operational before January 1, 2016, will be credited with two megawatt-hours of RECs toward PacifiCorp's RPS compliance.

In October 2012 the Company acquired the Black Cap Solar project (Black Cap) in Lakeview, Oregon to contribute to PacifiCorp's required 8.7 MW_{AC} minimum obligation under the solar photovoltaic capacity standard. In 2013, PacifiCorp issued a second RFP and as a result finalized

a 25-year PPA for Old Mill Solar, a 5.0 MW_{AC} project which is expected to be operational by December 15, 2015. The Company continues to pursue the remaining 1.7 MW_{AC} solar capacity, seeking the lowest cost alternative to meet the 2020 obligation.

Through December 31, 2014, the Company recovered costs for the Black Cap Solar Project and unbundled REC purchases associated with Oregon's RPS Compliance.⁴ PacifiCorp also recovered costs through the Oregon Solar Incentive Program Deferral Adjustment, Schedule 204.

2014 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:

The total number of megawatt-hours sold to Oregon retail consumers in 2014 was 12,958,736 megawatt-hours.

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 certificates acquired in compliance year 2014 that are used to meet the renewable portfolio standard requirement for compliance year 2014.

On December 31, 2012, PacifiCorp issued a RFP to solicit offers for the sale of unbundled RECs from generation facilities certified by the ODOE as RPS eligible. PacifiCorp specified that any proposals reflect delivery of RECs generated from January 1, 2007 through December 31, 2015. PacifiCorp will meet 20 percent of its 2014 RPS requirement with unbundled RECs from contracts executed prior to March 31, 2013. The total number of unbundled RECs that the Company will use toward the 2014 compliance year is 129,587.

⁴ Please see Commission Order No. 14-018 in docket UE 282.

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, 2015 and March 31, 2015 that are used to meet the renewable portfolio standard for compliance year 2014.

PacifiCorp's 2013 RPS Compliance Report⁵, identified plans to issue an RFP seeking historical, current- or forward-year vintage unbundled RECs that would qualify for Oregon renewable portfolio standard compliance. However, with a projected bank balance extending out through 2027, the Company has decided to defer issuance of RFPs seeking unbundled RECs until states begin to develop implementation plans under the EPA's draft 111(d) rule, providing clarity on whether an unbundled REC strategy is the least cost compliance alternative for Oregon customers.

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:

As a result of the unbundled REC RFP on December 31, 2012, PacifiCorp acquired 600,000 unbundled RECs in 2013. PacifiCorp used 127,788 unbundled RECs toward its 2012 RPS compliance requirement and 130,899 unbundled RECs toward its 2013 compliance requirement. The remaining 341,313 were banked. PacifiCorp will use 129,587 of the 341,313 banked unbundled RECs for its 2014 compliance year. The remaining unbundled RECs are banked for future RPS compliance requirements.

For 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 2014 is 518,350.

For detail by facility, see Confidential Attachment A.

⁵ In Order No. 14-371 in docket UM 1700, the Commission adopted Staff's recommendation finding PacifiCorp in compliance with the RPS for the 2013 compliance period.

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 1,554,142 bundled certificates issued in the compliance year 2014 that are banked for the RPS requirement for Oregon.

As of this filing, there are 14,757 bundled certificates issued in compliance year 2014 that were transferred from the Energy Trust of Oregon 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:

Table 1 lists the generating facilities associated with bundled renewable energy certificates and Table 2 lists the generating facilities associated with unbundled renewable energy certificates.

Table 1

Energy Source	Generating Facility	Resource Type ⁶	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 ⁷	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 ⁸	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		

⁶ QF = Qualifying Facility
 PPA = Power Purchase Agreement
 SVP = Solar Volumetric Project
 ETO = Energy Trust of Oregon Funded Project

⁷ Chevron Casper Wind is currently under a short-term QF PPA while a longer term agreement is being negotiated.

⁸ 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 1

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-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				
Solar	Central Oregon (CO 1)	SVP	Jefferson, Deschutes, Crook	OR	2010	15 Years	.209 _{AC}	100%
	Eastern Oregon (EO 1)	SVP	Umatilla, Wallowa	OR	2010		.211 _{AC}	
	Portland Oregon (PO 1)	SVP	Multnomah, Clatsop	OR	2010		.249 _{AC}	
	Willamette Valley (WV 1)	SVP	Marion, Benton, Linn, Lane, Polk	OR	2010		.227 _{AC}	
	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 1

Energy Source	Generating Facility	Resource Type ⁶	County	State	Commercial Operation Year or First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
	Joseph Community Solar	SVP	Wasco, Sherman Wallowa	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		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 (Confederated Tribes of Warm Springs)	SVP	Jefferson	OR	2014		.254 _{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 1

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	Not Applicable	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	
Biogas	Farm Power Misty Meadow	ETO	Tillamook	OR	2013	Not Applicable	0.75	

Table 2

Energy Source	Generating Facility	Resource Type⁶	County	State	First Year Contract	Duration	Nominal Capacity (MW)	OR Share Nameplate (MW)
Biogas	Dry Creek Landfill	PPA	Jackson	OR	2013	Not Applicable	Not Applicable	Not Applicable
	AgPower Jerome	PPA	Jerome	ID	2013			
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			
	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				
Hydro - Incremental	Rocky Reach Hydroelectric Project - C11	PPA	Chelan	WA	2013	Not Applicable	Not Applicable	Not Applicable

Resources listed in Table 1, with the exception of those associated with the Oregon Solar Incentive Program and Black Cap Solar project, are system resources. Resource costs are allocated on dynamic factors. For years 2007 through 2014, the following system generation allocation factors were used to allocate the renewable energy credits associated with the system resources:

Table 3							
2010 Protocol Allocation Method - Oregon							
System Generation Factor							
2007	2008	2009	2010	2011	2012	2013	2014
27.44%	28.19%	27.49%	26.20%	25.81%	25.93%	25.20%	25.51%

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 Attachment C identifies the WREGIS certificates that PacifiCorp intends to retire to meet the RPS for compliance year 2014. Upon Commission approval of the 2014 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 2014 RPS Compliance Report is consistent with the acknowledged 2015-2019 RPIP with the exception that the 2014 RPS Compliance Report includes additional facilities that are certified by ODOE, including projects in the Oregon Solar Incentive Program and qualifying facility contracts.

As described earlier, in developing the costs reported in the 2014 RPIP, the cost information is from the most recently filed 2015-2019 RPS Implementation Plan, where the costs were developed in accordance with OAR-860-083-0100.

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 2014 is 647,937.

For detail by facility and cost information, 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 4 below shows the annual revenue requirement for 2014, 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 2014.

Table 4			
Compliance Year	Oregon Allocated Nominal Levelized Incremental Cost (\$000s)	4% of Oregon Annual Revenue Requirement (\$000s)	% Oregon Annual Revenue Requirement Threshold
2014	\$161	\$50,452	0.03%

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 2014 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 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:

Energy Source	Generating Facility	Resource Type⁹	County	State	Commercial Operation Year or First Year Contract
Biogas	Farm Power Misty Meadow	ETO	Tillamook	OR	NA
Solar	Solwatt II	SVP	Umatilla	OR	2014
	Powell Butte Solar	SVP	Crook	OR	2014
	Southern Oregon (SO 10)	SVP	Klamath, Josephine, Douglas, Jackson	OR	2014
	Southern Oregon (SO 11)	SVP	Klamath, Josephine, Jackson	OR	2014
	Portland Oregon (PO 2)	SVP	Multnomah, Clatsop	OR	2014
	Columbia River (CR 2)	SVP	Wasco	OR	2014
	Central Oregon (CO 3)	SVP	Deschutes, Jefferson, Crook	OR	2014
CTWS (Confederated Tribes of Warm Springs)	SVP	Jefferson	OR	2014	
Wind	Foot Creek II	QF	Carbon	WY	2014
	Foot Creek III	QF	Carbon	WY	2014

For details on number of RECs and cost information, see Confidential Attachment D.

⁹ QF = Qualifying Facility
 PPA = Power Purchase Agreement
 SVP = Solar Volumetric Project
 ETO = Energy Trust of Oregon Funded Project

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.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PACIFICORP D/B/A PACIFIC POWER

2014 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”).

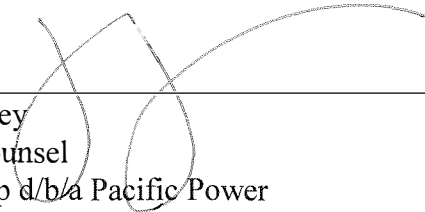
² OAR 860-001-0080(2).

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, 2015.



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 1700

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Dated this 1st of June, 2015.



Amy Eissler
Coordinator, Regulatory Operations

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2014**

Attachment A

**CONFIDENTIAL
2014 RPS Compliance
RECs and Cost Information**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2014**

Attachment B

**CONFIDENTIAL
Banked Bundled and Unbundled RECs**

**THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER**

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2014**

Attachment C

**CONFIDENTIAL
2014 RPS Compliance
WREGIS Certificates**

THIS ATTACHMENT IS
CONFIDENTIAL AND
PROVIDED UNDER
SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2014**

Attachment D

**CONFIDENTIAL
Vintage 2007 – Vintage 2014
RECs and Cost Information**

THIS ATTACHMENT IS
CONFIDENTIAL AND
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SEPARATE COVER

**PacifiCorp
Renewable Portfolio Standard Oregon
Compliance Report
2014**

Attachment E

**2014 RPS Compliance
REC Summary**

**PacifiCorp
Renewable Portfolio Standard
Attachment E – Compliance REC Summary
Oregon Compliance Report
2014**

The bundled and unbundled RECs to be retired for PacifiCorp’s 2014 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 2014 Renewable Portfolio Standard
Aggregated Data**

BUNDLED RECS	VINTAGE YEAR				
RESOURCE TYPE	LOCATION	2009	2010	2011	2012
GEOTHERMAL	UT		9,274		
WIND	OR, WY, WA, ID	64,101	371,162		
HYDRO - LOW IMPACT	UT, OR, ID		73,813		
TOTAL		64,101	454,249		

UNBUNDLED RECS	VINTAGE YEAR				
RESOURCE TYPE	LOCATION	2009	2010	2011	2012
WIND	OR, WA, NM			36,420	68,814
HYDRO - INCREMENTAL	WA			7,507	16,846
TOTAL				43,927	85,660