

August 14, 2015

VIA ELECTRONIC FILING AND OVERNIGHT DELIVERY

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

RE: Docket No. UE-151162—Revised 2015 Renewable Portfolio Standard Report DO NOT REDOCKET

On June 1, 2015, Pacific Power & Light Company, a division of PacifiCorp (Pacific Power or Company), submitted its 2015 Annual Renewable Portfolio Standard (RPS) Report to the Washington Utilities and Transportation Commission (Commission) in accordance with RCW 19-285-040 and WAC 480-109-210(1). At Commission staff's request, the Company submitted a revised report on July 10, 2015, that included an explanation of how renewable energy generation is allocated.

The Company is submitting this revised 2015 RPS Report to replace the revised report filed on July 10, 2015, in its entirety. The revised report includes additional information in the multistate allocation section in the report as well as an updated Attachment A.

The Company requests confidential treatment of the revised report and Attachment A in accordance with WAC 480-07-160.

Please direct informal questions to Ariel Son, Manager, Regulatory Projects, at (503) 813-5410.

Sincerely,

R. Psyce' Dalley /Af R. Bryce Dalley

Vice President, Regulation

Enclosures



Pacific Power & Light Company

Washington

Annual Renewable Portfolio Standard Report

CONFIDENTIAL per WAC 480-07-160 <u>REDACTED</u>

June 1, 2015 Refiled August 14, 2015

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Introduction

Pacific Power & Light Company, a division of PacifiCorp (PacifiCorp or Company) submits this 2015 Annual Renewable Portfolio Standard Report (Renewable Report) to the Washington Department of Commerce (Commerce) and Washington Utilities and Transportation Commission (WUTC or Commission) in accordance with reporting requirements established as part of the Energy Independence Act (EIA). The report is consistent with RCW 19.285.070 which states, in relevant part:

- (1) On or before June 1, 2012, and annually thereafter, each qualifying utility shall report to the department on its progress in the preceding year in meeting the targets established in RCW 19.285.040, including expected electricity savings from the biennial conservation target, expenditures on conservation, actual electricity savings results, the utility's annual load for the prior two years, the amount of megawatt-hours needed to meet the annual renewable energy target, the amount of megawatt-hours of each type of eligible renewable resource acquired, the type and amount of renewable energy credits acquired, and the percent of its total annual retail revenue requirement invested in the incremental cost of eligible renewable resources and the cost of renewable energy credits.
- (2) A qualifying utility that is an investor-owned utility shall also report all information required in subsection (1) of this section to the commission, and all other qualifying utilities shall also make all information required in subsection (1) of this section available to the auditor.

This report is consistent with the collaborative workshop documents addressing annual reporting requirements, in Docket UE-110523, Order 01 in Docket UE-120813, and Order 1 in Docket UE-140802.

This report demonstrates that PacifiCorp met the 2014 renewable energy target of acquiring three percent of the Company's Washington retail load with a combination of eligible renewable resources and renewable energy credits (RECs). This report also demonstrates that the Company is positioned to meet the 2015 renewable energy target with a combination of eligible renewable resources and RECs to supply at least three percent of its average Washington retail load.

Executive Summary

Under RCW 19.285.040(2)(a), each qualifying utility shall use eligible renewable resources, acquire equivalent RECs, or a combination of both, to meet annual targets. As demonstrated in this report, the Company met the targets in accordance with WAC 480-109-200(1)(a). The Company met the 2014 renewable energy target with a combination of eligible renewable resources and RECs and the Company is positioned to use eligible renewable resources and RECs to supply at least three percent of its Washington load to satisfy the 2015 renewable energy target. The Company plans to meet its 2015 renewable energy target with a combination of RECs from company-owned resources, REC purchases, and eligible renewable resources, including hydroelectric facilities that were upgraded after March 1999.

A summary of the Company's 2014 and 2015 renewable resource targets and eligible renewable resources and RECs are provided below:

Table 1

PacifiCorp Renewable Target, Eligible Resource and RECs											
2014 2015											
Average Retail Sales (MWh)	4,117,646	3,996,929									
Percentage Target	3%	3%									
Renewable Target	122,019	123,155									
Qualifying Resources (MWh) &											
RECs	122,019	123,155									

The Company does not intend to rely on any of the alternative compliance mechanisms provided in WAC 480-109-220 for meeting either the 2014 or 2015 renewable energy targets.

Annual Load for Previous Two Years and Renewable Energy Target

Under RCW 19.285.040(2)(c) and WAC 480-109-200(1)(a), a utility must calculate its annual target based on its average load for the previous two years. Accordingly, using the average of the Washington annual retail loads for the previous two years, Table 2 calculates the annual renewable targets for 2014 and 2015.

Table 2

Target Y	ear 2014
Prior Year Retail Sales (2012)	4,041,898 MWh
Prior Year Retail Sales (2013)	4,092,688 MWh
Average Retail Sales	4,067,293 MWh
Percentage Target	3%
Renewable Target	122,019 MWh/RECs
Target Y	ear 2015
Prior Year Retail Sales (2013)	4,092,688 MWh
Prior Year Retail Sales (2014)	4,117,646 MWh
Average Retail Sales	4,105,167 MWh
Percentage Target	3%
Renewable Target	123,155 MWh/RECs

Renewable Energy Acquired to Meet Renewable Energy Target

The Company met its 2014 renewable resource target and plans to meet its 2015 renewable resource target with a combination of RECs from company-owned and third-party wind facilities (Power Purchase Agreements) and eligible renewable resources such as hydroelectric facilities with upgrades completed after March 1999.

The Company is submitting the Commission's RPS Report Tool as Confidential Attachment A. The RPS Report Tool details the renewable resource target for 2014 and 2015 and the RECs and renewable resources to meet the 2014 and 2015 targets.

The Company will use RECs from the following Company-owned facilities or power purchase agreements:

Table 3

Resource Name	Fuel Source
Goodnoe Hills	Wind
Leaning Juniper	Wind
Marengo I	Wind
Marengo II	Wind
Top of the World	Wind

These five wind facilities, other than Top of the World, are located in the Pacific Northwest. Top of the World is located in Wyoming. Descriptions of the projects are referenced in the Supporting Documents for Renewable Report section of this report.

Additionally, the Company identified upgrades to hydroelectric facilities located in the Pacific Northwest that were completed after March 31, 1999, listed in Table 4 below.

Table 4

Resource Name	Fuel Source
Prospect 2	Water – Hydro Upgrade 1999
Lemolo 1	Water – Hydro Upgrade 2003
JC Boyle	Water – Hydro Upgrade 2005
Lemolo 2	Water – Hydro Upgrade 2009

The Company performed analyses to determine the incremental energy associated with upgrades to hydroelectric facilities, consistent with Method two, as identified in WAC 480-109-200(7)(c). The methodology is described in more detail in Attachment B. This methodology is consistent with the methodology the Company submitted to the Oregon Department of Energy to certify these facilities and calculate the percentage of the incremental energy for the Oregon RPS program. The Company performed an analysis of the incremental energy for upgrades to hydroelectric facilities that includes actual generation data from 2007 through 2012. The Company re-submitted the analysis to the Oregon Department of Energy in December 2013 and the Oregon Department of Energy

approved the updated incremental hydropower efficiency percentages, effective January 2014. The Company is providing the analyses in Confidential Work Papers—PacifiCorp Hourly Incremental Hydro Analyses.

PacifiCorp has two contracts for REC-only transactions executed before January 1, 2012. The counterparties have provided RECs from Washington RPS-eligible resources.

The Company also has executed power purchase contracts for the output from facilities owned by Grant County Public Utility District (PUD). Grant PUD has determined the average amount of incremental hydroelectric generation associated with the Wanapum Dam Future Unit Fish Bypass and the Priest Rapids Dam Top Spill for Fish Passage.

WAC 480-109-200(3) requires WREGIS registration of all eligible hydropower generation and all RECs used for utility compliance with the renewable resource target. As of the time of this report, Wanapum Dam and Priest Rapids Dam have not been registered in WREGIS. To the extent these resources are not registered in WREGIS and consistent with the Commission's newly-adopted rule, the Company will not use generation from these resources for compliance with its renewable resource target until these resources are registered in WREGIS. The Company is working with Grant PUD to encourage WREGIS registration of the aforementioned facilities.

Washington Senate Bill 5400 was passed in April 2013, allowing renewable resources located in states served by PacifiCorp to qualify as eligible to meet Washington's EIA. The Company is disclosing the renewable resources located in states served by PacifiCorp and situated outside the Northwest. PacifiCorp owns or has contracts with counterparties that own the renewable resources listed in Table 5. In the event of any shortfall in renewable energy generation in 2014 or future years, PacifiCorp may use RECs or renewable generation from these resources.

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¹ One of the two contracts was executed for RECs used toward compliance years 2012 and 2013. The other provided RECs for compliance year 2014.

Table 5

Resource Name	Location	Туре	Fuel Source
Campbell Hill-Three Buttes	Wyoming	PPA	Wind
Chevron Casper Wind Farm	Wyoming	PPA	Wind
Dunlap I	Wyoming	Utility Owned	Wind
Foote Creek I	Wyoming	Utility Owned	Wind
Glenrock Wind	Wyoming	Utility Owned	Wind
Glenrock Wind III	Wyoming	Utility Owned	Wind
High Plains	Wyoming	Utility Owned	Wind
McFadden Ridge	Wyoming	Utility Owned	Wind
Mountain Wind Power	Wyoming	PPA	Wind
Mountain Wind Power II	Wyoming	PPA	Wind
Rock River I	Wyoming	PPA	Wind
Rolling Hills Wind	Wyoming	Utility Owned	Wind
Seven Mile Hill Wind I	Wyoming	Utility Owned	Wind
Seven Mile Hill Wind II	Wyoming	Utility Owned	Wind
Top of the World	Wyoming	PPA	Wind
Pioneer	Utah	Utility Owned	Water – Hydro
			Upgrade 1999
Big Fork	Montana	Utility Owned	Water – Hydro
			Upgrade 2001
Oneida	Idaho	Utility Owned	Water – Hydro
			Upgrade 2004
Cutler	Utah	Utility Owned	Water – Hydro
			Upgrade 2007

In the following pages is the Company's report submitted to Commerce on June 1, 2015, that provides a summary of the forecasted number of megawatt-hours and RECs to meet the 2015 compliance target.

Energy Independence Act (I-937) Commerce Renewable Report - 2015

Energy Independence Act (EIA) Renewable Energy Report 2015

- Utility	Pacific Power & Light Company
Report Date	June 1, 2015
Utility Contact Name/Dept	Natasha Siores
Phone	(503) 813-6583
Email	natasha.siores@pacificorp.com

une 1, 2015	2014 Annual Load (MWh)	4,117,646
tasha Siores	Average of 2013 & 2014 Annual Loads (MWh)	4,105,167
03) 813-6583	2015 Renewable Target (% of load)	3%
iores@pacificorp.com	2015 Eligible Renewable Energy Target (MWh)	123,155
······	Eligible Renewables Acquisitions / Investments (MWh)	123,155
[RCW 19.285.040(2)(a)]		

2015 Compliance Method: RPS Target [R

Resource Cost [RCW 19.285.050]

No Load Growth [RCW 19.285.040(2)(d)]

Expenditures on Renewable Resources and RECs - 2015	
Amount invested in incremental cost of eligible renewable resources and the cost of RECs	\$1,038,885
Total annual retail revenue requirement - 2015	\$328,641,634
Investment in renewables and RECs as a percent of retail revenue requirement	0.3%

Loads and Resources

2013 Annual Load (MWh)

4,092,688

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
	Water	Wind	Solar Energy	Geothermal Energy	Landfill Gas	Wave, Ocean, Tidal	Gas from Sewage	Biodiesel	Biomass Energy	Apprentice Labor	Distributed Generation
	MWh	MWh	MWh	MWh	MWh	MWh	MWh	MWh	MWh	MWh equiv.	MWh equiv.
Eligible Renewable Resources (MWh)	1,634	-	-	-	-	-		-	-	-	
Renewable Energy Credits (MWh)		121,521		-	-	-	•	-	-	-	-
Total Renewables (MWh)	1.634	121 521		_	_	_		**	_	_	-

2015 Reporting Year:

This renewable energy report summarizes the eligible renewables resources and renewable energy credits (RECs) that the utility has acquired by January 1, 2015 for the purpose of meeting its Energy Independence Act (EIA) renewables target for 2015. The actual resources and RECs used to comply with the 2015 EIA target may vary from those reported here. Utilities will report in June of 2017 on the actual results for 2015.

Compliance Methods:

The EIA provides three compliance methods for utilities:

- Meet the renewable energy target using any combination of renewable resources and RECs. The target for 2015 is 3% of the utility's load
- Invest at least 4% of the utility's annual revenue requirement in the incremental cost of renewable resources and RECs.
- Invest at least 1% of its annual revenue requirement in renewable resources and RECs. This option is available only to certain utilities that are not growing.

All utilities must report the renewable resources and RECs acquired for the 2015 target year. Utilities that elect to use a compliance method based on renewable investments must provide additional information demonstrating compliance with that method.

NOTE: This is a general explanation of the renewable energy requirements of the Energy Independence Act, intended to help members of the public understand the information reported by the utility. Consult Chapter 19.285 RCW and Chapter 194-37 WAC for details.

Energy Independence Act (I-937) Commerce Renewable Report – Continued

Renewable Resources	Com	Utility opliance Year	,	wer & Light 2015	Company						
Note: Investor Owned Utilities may of Commission Renewable and Consen	complete this page or a vation filings for 2014.	ttach their Utilii	lies and Tran	sportation							
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(i)
		Water	Wind	Solar Energy	Geothermal Energy	1450.0	•••	Gas from	Biodiesel	Biomass Energy	Apprentice Labor
Facility Name	WREGIS ID_	MWh	M₩h	MWh	MWh	MWh	MWh	MWh	MWh	MWh	MWh equiv.
JC Boyle	W180	178									
Lemolo 1	W157	1,101									
Lemolo 2	W158	92			SD.11.						
Prospect 2	W140	263									
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Energy Independence Act (I-937) Commerce Renewable Report – Continued

Renewable Energy Credits			Utility	Pacific Po	wer & Light	t Company							
		Compl	iance Year		2015								
		_	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(I)	(k)
		_	Water	Wind	Solar Energy	Geothermal Energy	Landfill Gas	Wave, Ocean, Tidal	Gas from Sewage Treatment	Biodiesel	Biomass Energy	Apprentice Labor	Distributed Generation
	WREGIS ID	REC Year	MWh	MWh	MWh	MWh	MWh	MWh	MWh	MWh	MWh	MWh equiv.	MWh equiv
Goodnoe Hills	W536	2014		11,236									
Leaning Juniper	W200	2014		17,270					***************************************				
Marengo	W185	2014		29,478	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		, , , , , , , , , , , , , , , , , , ,						
Marengo II	W772	2014		14,022	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,								
Top of the World	W1749	2015		36,420									
Wolverine Creek	W188	2015		13,095				4					
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Energy Independence Act (I-937) Commerce Renewable Report – Continued

	Pacific Power & Light Company	
Target Year		
Documentation of the calculation and inputs for percentage of reve	nue requirement invested in renewa	bles:
2015 revenue requirement is pro-rated from Dockets UE-130043 and UCompany, a division of PacifiCorp filed with the Washington Utilities a		nental cost for resources, please refer to the renewable report for Pacific Power & Light e 1, 2015.
The state of the s		
Other notes and explanations:		
- 2015 data is an estimate and subject to change.		

Alternative Compliance

Under WAC 480-109-210(2)(b), the utility must state in its report if it is relying upon one of the alternative compliance mechanisms provided in WAC 480-109-220 instead of meeting its renewable resource target. The Company does not anticipate investing at least four percent of its total annual retail revenue requirement on the incremental costs of eligible renewable resources, RECs, or a combination of both.

Further, the Company does not plan to rely on any other alternative compliance mechanisms to meet its renewable resource targets for 2014 or 2015.

Resource Cost Compared to Annual Retail Revenue Requirement

Under RCW 19.285.070(1), a utility must report the percent of its total annual retail revenue requirement invested in the incremental cost of eligible renewable resources and the cost of RECs. Similarly, under WAC 480-109-210, a utility must report the incremental cost of eligible renewable resources and RECs, and the ratio of this investment relative to the utility's total annual retail revenue requirement. The incremental cost of an eligible renewable resource is defined in RCW 19.285.050(1)(b) as the difference between the levelized delivered cost of the eligible renewable resource, regardless of ownership, compared to the levelized delivered cost of an equivalent amount of reasonably available substitute resources that do not qualify as eligible renewable resources, where the resources being compared have the same contract length or facility life.

With the adoption of General Order R-578 in Docket UE-131723, the Commission revised rules implementing RCW 19.285, the EIA, including the application of a new methodology for calculating incremental cost. The Company performed the incremental cost calculations as defined in WAC 480-109-210.

REC Costs for Wind Resources

The estimated cost of the RECs from renewable wind resources is the calculated levelized cost of each eligible renewable resource at the time of acquisition, compared to an equivalent amount of the lowest-reasonable-cost resource available to the utility at the time of the eligible resource's acquisition.²

REC Costs for REC-only Purchases

The cost of RECs from the REC-only purchase is based on the contractual price set-forth in the applicable bilateral agreement between the Company and the counterparty.

Incremental Costs for Renewable Energy from Incremental Hydro Upgrades

The incremental cost of the eligible incremental renewable energy from owned hydro and purchase power agreements is deemed to be zero.

The majority of the equipment replacements associated with the Company-owned hydroelectric facilities were made in conjunction with facility overhauls; the incremental cost associated with the equipment replacements is zero on the economic basis that the marginal cost of gaining output was less than the cost of an equivalent alternative. The upgrades to the hydroelectric facilities were economic decisions, as the upgrades were

² The cost of RECs from PacifiCorp's resource(s) located outside of the West Control Area are not included in Washington customers' rates. For illustrative purposes and to determine the ratio of incremental cost to revenue requirement, resource costs *outside* the West Control Area are calculated using the weighted average cost of the resources *within* the West Control Area (Goodnoe Hills, Leaning Juniper, Marengo I and Marengo II).

made to increase efficiency and to prevent forced outages from old and less reliable equipment. As such, the Company would have made the upgrades regardless of the RPS requirement.

Confidential Work Papers—PacifiCorp Resource Cost Analysis provides the key assumptions and analysis that the Company used to forecast the estimated resource costs associated with the renewable resources and RECs for the target years 2014 and 2015.

Revenue Requirement

The revenue requirement amounts are from recent general rate cases. The 2014 revenue requirement is \$321,059,953 from Docket UE-130043, and the 2015 revenue requirement is \$328,641,634,³ prorated from Dockets UE-130043 and UE-140762.

Resource Costs Compared to Revenue Requirement

Table 6 shows the expected Washington-allocated resource costs (incremental cost of eligible renewable resources and the cost of RECs) compared to the annual revenue requirement for 2014 and 2015.

Table 6

Calendar Year	Total Washington Allocated Resource Costs	Washington Annual Revenue Requirement	% of Washington Expected Allocated Resource Costs to Annual Revenue Requirement
2014	\$ 2,108,074	\$321,059,953	0.66%
2015	\$ 1,038,885	\$328,641,634	0.32%

Based on this analysis, the Company will not exceed the four percent threshold.

³ Rates approved in Docket No. UE-130043 in effect through March 30, 2015: \$321,059,953 *3/12 = \$80,264,988 <u>plus</u> the rates approved in Docket No. UE-140762 in effect from March 31, 2015, forward: \$331,168,861 *9/12 = \$248,376,646.

Multistate Allocations

Under WAC 480-109-210(e)(i), a utility serving retail customers in more than one state must allocate certificates consistent with the utility's most recent commission-approved interstate cost allocation methodology. This section explains how the Company applied the allocation methodology to arrive at the number of RECs (renewable energy certificates) allocated to Washington ratepayers.

PacifiCorp is a multijurisdictional utility providing electric retail service to approximately 1.8 million customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. Of those customers, the Company serves approximately 133,000 customers located in the state of Washington.

PacifiCorp allocates RECs to its states consistent with the inter-jurisdictional allocation methodologies approved in each state. All of PacifiCorp's jurisdictions, except Washington, use the 2010 Protocol inter-jurisdictional allocation methodology, which allocates all generation-related costs, revenues, rate base balances and RECs to each state using the system generation (SG) allocation factor. The SG factor is calculated based on each state's contribution to PacifiCorp's energy and capacity requirements for its entire six-state system. Using this methodology, Washington's SG factor is approximately 8 percent (i.e. Washington comprises approximately 8 percent of PacifiCorp's six-state system).

In Washington, however, PacifiCorp uses the West Control Area (WCA) interjurisdictional allocation methodology. This methodology allocates west control area generation resources, primarily located in California, Oregon, and Washington, using the control area generation west (CAGW) allocation factor. The CAGW factor is calculated based on each state's contribution to PacifiCorp's energy and capacity requirements for the west control area (California, Oregon, and Washington). Washington's CAGW factor is approximately 23 percent (i.e. Washington comprises approximately 23 percent of the west control area).

As a result of Washington's use of the WCA methodology, PacifiCorp's Washington rates reflect a CAGW share, approximately 23 percent, of west control area generation resources. Accordingly, Washington customers are entitled to approximately 23 percent of RECs from these facilities. Using different inter-jurisdictional allocation methodologies for different states, however, creates challenges because the sum of each state's allocated share may not equal 100 percent. To address this issue, PacifiCorp first allocates each state its share of RECs using the SG factor. Using this process, Washington receives approximately 8 percent of RECs from west control area resources.

The WCA contains the following eligible resources:

- Goodnoe Hills (wind)
- Leaning Juniper (wind)
- Marengo I (wind)
- Marengo II (wind)

CONFIDENTIAL per WAC 480-07-160 REDACTED

- Prospect 2 (incremental hydro)
- Lemolo 1 (incremental hydro)
- Lemolo 2 (incremental hydro)
- JC Boyle (incremental hydro)

PacifiCorp addresses the variance between Washington's SG share of west control area resources (approximately 8 percent) and Washington's CAGW share (approximately 23 percent) by providing Washington RECs from other eligible resources. In the past, PacifiCorp's shareholders have purchased unbundled RECs to make up the difference.⁴ Recent changes in the EIA allow PacifiCorp to use RECs from PacifiCorp facilities in other states where PacifiCorp makes retail sales.⁵ This means that the actual RECs used to fulfill Washington's CAGW share may include RECs from resources located in any of PacifiCorp's jurisdictions or include unbundled REC purchases, but the total will equal Washington's CAGW share of west control area resources.

In 2015, PacifiCorp plans to use generation from the following resources to provide Washington with its full CAGW allocation:

- Wolverine Creek (wind Idaho)
- Top of the World (wind Wyoming)
- Dunlap I (wind Wyoming)
- Campbell Hill/Three Buttes (wind Wyoming)
- Glenrock I (wind Wyoming)
- Rolling Hills (wind Wyoming)
- Seven Mile Hill (wind Wyoming)

PacifiCorp does not plan to use any unbundled REC purchases to supply Washington's CAGW allocation in 2015. Table 7 summarizes how PacifiCorp plans to supply Washington with its CAGW share of renewable generation in 2015.

Table 7: Allocation of PacifiCorp's 2015 Eligible Generation to Washington [REDACTED]

Total WCA Eligible Generation (Projected)	Washington CAGW Allocation Factor	Washington WCA Allocation	SG Allocation of WCA Generation	Adjustments from Other Eligible (Company) Resources	Adjustments from Purchased RECs	Final Allocation
Lanconrection	23.0849%					

⁴ Washington customers receive the full value of their CAGW share of renewable generation through shareholder-purchased unbundled RECs and revenues from REC sales through the REC revenue tracking mechanism.

⁵ RCW 19.285.030(12)(e)

Any unbundled REC purchases necessary for RPS compliance in excess of Washington's CAGW share of west control area resources will be reflected in Washington customers' rates. This treatment ensures that Washington customers receive an allocation of costs and benefits of RECs proportionate to its share of renewable resource costs reflected in rates.

PacifiCorp follows the Western Renewable Energy Generation Information System (WREGIS) and state renewable portfolio standards (RPS) requirements to ensure that under no circumstances are any RECs double-counted.

Prior Year Progress

As evidenced in this report, the Company met its Washington 2014 renewable compliance target with a combination of RECs from eligible renewable resources, unbundled REC purchases and renewable energy from hydroelectric facilities with upgrades completed after March 1999. The Company has set aside the WREGIS certificates for the 2014 compliance target and upon Commission approval, the Company will retire these WREGIS certificates. The Company is providing a listing of the WREGIS certificates in Confidential Work Papers—WREGIS Certificates for Washington Compliance for 2014.

The Company will invest less than four percent of its total annual retail Washington revenue requirement on the incremental costs of eligible renewable resources, RECs, or a combination of both for 2014.

Further, the Company does not rely on any other alternative compliance mechanisms to meet its renewable resource targets for 2014.

Current Year Progress

The Company is positioned to meet its Washington 2015 renewable compliance target with a combination of RECs from eligible renewable resources, and renewable energy from hydroelectric facilities with upgrades completed after March 1999. The Company has also identified, to date, the WREGIS certificates that it intends to use toward the 2015 compliance target. The Company is providing a listing of the WREGIS certificates in Confidential Work Papers—WREGIS Certificates for Washington Compliance for 2015.

The Company will invest less than four percent of its total annual retail Washington revenue requirement on the incremental costs of eligible renewable resources, RECs, or a combination of both for 2015.

Further, the Company does not rely on any other alternative compliance mechanisms to meet its renewable resource targets for 2015.

Supporting Documents for Renewable Report

Provided below are links to supporting documents in support of the Company's Renewable Report.

1. Wind Project Fact Sheets/Information

Goodnoe Hills

http://www.pacificorp.com/content/dam/pacificorp/doc/Energy Sources/EnergyGeneration_FactSheets/PP_GFS_Goodnoe_Hills.pdf

Leaning Juniper

http://www.pacificorp.com/content/dam/pacificorp/doc/Energy Sources/EnergyG eneration FactSheets/PP GFS Leaning Juniper.pdf

Marengo

http://www.pacificorp.com/content/dam/pacificorp/doc/Energy Sources/EnergyGeneration FactSheets/PP GFS Marengo.pdf

Marengo II

http://www.pacificorp.com/content/dam/pacificorp/doc/Energy Sources/EnergyGeneration_FactSheets/PP_GFS_Marengo_II.pdf

Top of the World

http://www.pacificorp.com/es/re/totw.html

2. Collaborative group documents from workshops conducted at the Commission and through a number of multiple issues-specific teleconference meetings, filed in Docket UE-110523.

http://www.utc.wa.gov/docs/Pages/DocketLookup.aspx?FilingID=110523

Listing of Attachments

Attachment A (Confidential) – Washington Utilities and Transportation Commission RPS Report Tool

Attachment B – PacifiCorp Description of Incremental Hydro Methodology and Oregon Department of Energy Correspondence on Updated Certification for Efficiency Upgrades at Eleven Hydropower Generating Units

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Pacific Power & Light Company

Renewable Report

RPS Reporting Tool

REDACTED CONFIDENTIAL PER WAC 480-07-160

June 1, 2015

General Instructions:

Grey shading indicates cells where information is not required Yellow shading indicate cells where inputs are entered Green shading indicate cells with dropdown lists White shading indicate formulated cells Blue shading indicates summary calculations

"Compliance Summary" Worksheet

Enter "X" When Complete	Checklist Item	Cell/Row Description	Units	Cell/Row	Comments
	1	Reporting Entity	Text	B2	Enter the name of the reporting entity
	2	Reporting Date	Year	B4	Enter the date the report is submitted
	3	Delivered Load to Retail Customers	MWh	B7:E7	Enter the MWh delivered to customers

"Facility Detail" Worksheet

Enter "X" When Complete	Checklist Item	Cell/Row Description	Units	Cell/Row	Comments
Instructions in the	section are	for the cells B2:F31. Each ro	w represents a	different fac	ility.
	1	Facility Name	Text	B2:B31	Enter the name of the qualifying facility or contract
	2	WREGIS ID	Text	C2:C31	Enter the WREGIS ID for the qualifying facility
	3	Facility Type	Toggle	D2:D31	Select the generation type for the qualifying facility
	4	Extra Apprenticeship Credit Eligibility	Toggle	E2:E31	For facilities that qualify for extra apprenticeship credits select "Eligible". Select "Not Eligible for non-qualifying facilities.
	5	Distributed Generation Eligibility	Toggle	F2:F31	For facilities that qualify for distributed generation select "Eligible". Select "Not Eligible for non-qualifying facilities.

Enter "X" When Complete	Checklist Item	Cell/Row Description	Units	Cell/Row	Comments
		ntify the input locations for t und in the "Facility Detail" w	•		'Facility Detail" worksheet. Inputs for cility 1.
	6	Total MWh Produced from Facility	Number	D39:F39	Enter the annual MWh output from the qualifying facility
	7	Percent of MWh Qualifying	%	D40:F40	Enter the percent of MWh produced that are eligible for meeting RCW 19.285
	8	Percent of Qualifying MWh Allocated to WA State Compliance	%	D41:F41	Enter the percent of qualifying MWh used for compliance with RCW 19.285. Used for facilities that are utilized for RPS compliance in two or more states.
	9	Quantity of RECs from MWh Sold	Number	D50:F50	Enter the annual amount of RECs sold. For Multi-Jurisdictional Utilities, enter in annual WA allocated amount of RECs sold.
	10	Bonus Incentives Transferred	Number	D51:F51	Enter the annual amount of transferred RECs procured from bonus incentives
	11	Bonus Incentives Not Realized	Number	D52:F52	Enter the annual number of bonus incentives that were not realized
	12	2011 Surplus Applied to 2012	Number	D56	Enter the amount of RECs procured in 2011 used for compliance in 2012
	13	2012 Surplus Applied to 2011	Number	E57	Enter the amount of RECs procured in 2012 used for compliance in 2011
	14	2012 Surplus Applied to 2013	Number	E58	Enter the amount of RECs procured in 2012 used for compliance in 2013
	15	2013 Surplus Applied to 2012	Number	F59	Enter the amount of RECs procured in 2013 used for compliance in 2012
	16	Adjustment for Events Beyond Control	Number	D62:F62	Enter the annual MWh not produced due to events beyond control as outlined in RCW 19.28S.040 (2)(i)

Pacific Power & Light Company Reporting Entity: June 1, 2015 **Reporting Date: RCW 19.285 Compliance Need** 2013 2014 2015 2010 2011 2012 4,005,863 Delivered Load to Retail Customers (MWh) 3,984,631 4,041,898 4,092,688 4,117,646 WA State RCW 19.285 Requirement 0% 3% 3% 3% 3% **Quantity Required for Compliance** 119,857 120,716 122,019 Eligible Quantity Acquired 2010 2011 2012 2013 2014 2015 Qualifying MWh Allocated to WA 104,826 107,711 107,159 114,902 Quantity from Non REC Eligible Generation Total Quantity Available for RCW 19.285 Compliance 104.826 107,711 107,159 114,902 Sales and Transfers 2010 2012 2013 2014 2015 2011 Quantity of RECs Sold **Bonus Incentives Transferred** Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Adjustments 2010 2011 2012 2013 2014 2015 2011 Surplus Applied to 2012 (104,826) 104,826 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 (92,680) 92,680 2013 Surplus Applied to 2012 Note 1 2013 Surplus Applied to 2014 (79, 122)79,122 2014 Surplus Applied to 2013 72,006 2014 Surplus Applied to 2015 (72.006) 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 (104,826) 12,146 13,558 7,116 **Net Surplus Adjustments Adjustment for Events Beyond Control** --2014* 2010 2011 2012 2013 2015*

(0)

(0)

0

(0)

0

Note 1: 2013 surplus Applied to 2014 is 79,121 RECs. 79,122 reflects rounding in Facility Detail tab. Target amount of 122,019 RECs will be retired for CY2014.

In both the "Compliance Summary" and "Facility Detail" worksheets, utilities may need to protect commercially sensitive information by use of the CONFIDENTIAL designation.

PACIFICORP Notes and Assumptions

Retail Sales:

2010, 2011, 2012 and 2013, 2014 actual retail sales. 2015 load forecast based on 2015 IRP.

Facility Generation:

RCW 19.285 Compliance Surplus / (Deficit)

2011 - 2014 is based on actual generation or REC purchase data. 2015 is the generation forecast as of April 2015.

The Company uses one of three patterning methods to model wind resources. First, and if the appropriate data is available, historical monthly/seasonal patterns are developed using hourly data. This is the Company's preferred method. Second, if historical information is unavailable, but hourly data from wind site studies is, on/off peak engineering estimate patterns are developed. Third, if neither of the first two types of data is available, Energy Information Agency (EIA) wind patterning is used.

REC Sales:

The company does not plan to sell any excess RECs and will hold any excess RECs and apply to a future year target.

^{*} Any surplus shown in 2015 or 2016 may be sold or used for compliance in subsequent years. Compliance deficits shown in 2016 may be filled by REC procurement from subsequent years.

Facility Name:	Facility WREGIS ID:	Facility Type	Extra Apprenticeship Credit Eligibility:	Distributed Generation Bonus Eligibility:	Online Date:
Goodnoe Hills	W536	Wind	Not Eligible	Not Eligible	31-May-08
Leaning Juniper	W200	Wind	Not Eligible	Not Eligible	14-Sep-06
Marengo I	W185	Wind	Not Eligible	Not Eligible	1-Aug-07
Marengo II	W772	Wind	Not Eligible	Not Eligible	28-Jun-08
ennett Creek Windfarm - REC On	W542	Wind	Not Eligible	Not Eligible	30-Sep-08
Hot Springs Windfarm - REC Only	W543	Wind	Not Eligible	Not Eligible	30-Sep-08
*Tuana Springs - REC Only	W1503	Wind	Not Eligible	Not Eligible	14-May-10
Wanapum (Upgrade)	NA	ater (Incremental Hydi	Not Eligible	Not Eligible	1-Jul-63
Prospect 2 (Upgrade 1999)	W180	ater (Incremental Hydi	Not Eligible	Not Eligible	1-Oct-58
Lemolo 1 (Upgrade 2003)	W157	ater (Incremental Hydi	Not Eligible	Not Eligible	1-Jul-55
JC Boyle (Upgrade 2005)	W140	ater (Incremental Hydi	Not Eligible	Not Eligible	1-Jan-28
Lemolo 2 (Upgrade 2009)	W158	ater (Incremental Hydi	Not Eligible	Not Eligible	1-Nov-56
Wolverine Creek	W188	Wind	Not Eligible	Not Eligible	25-Apr-05
Priest Rapids	NA	ater (Incremental Hydi	Not Eligible	Not Eligible	1-Oct-59
Top of the World	W1749	Wind	Not Eligible	Not Eligible	1-Oct-10
Dunlap I	W1687	Wind	Not Eligible	Not Eligible	1-0ct-10
Campbell Hill/Three Buttes	W1383	Wind	Not Eligible	Not Eligible	31-Dec-09
Glenrock Wind I	W964	Wind	Not Eligible	Not Eligible	31-Dec-08
Rolling Hills	W928	Wind	Not Eligible	Not Eligible	17-Jan-09
Seven Mile Hill Wind I	W975	Wind	Not Eligible	Not Eligible	31-Dec-08
Facility 21					
Facility 22					
Facility 23					
Facility 24					
Facility 25				- 1	
Facility 26					
Facility 27					
Facility 28	<u> </u>			-	
Facility 29					
Facility 30					

^{*}Note: Due to a Nov. 2014 generation shortfall, Tuana Springs delivered eligible substitute RECs from Power County Wind Park South (WREGIS ID W2533) In both the "Compliance Summary" and "Facility Detail" worksheets, utilities may need to protect commercially sensitive information by use of the CONFIDENTIAL designation.

Facility Name: Goodnoe Hills

MWh All	ocated t	o W A	Compl	liance
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Total MWh Produced / Purchased from Goodnoe Hills Percent of MWh Qualifying Under RCW 19.285 Percent of Qualifying MWh Allocated to WA Eligible MWh Available for RCW 19.285 Compliance

18,896	17,609	17,896	17,392	neronalization de la company de la compa	
 40.00	47.000	47.000		According to the second of the	
8%	8%	8%	8%	8%	
 100%	100%	100%	100%	100%	100%
239,431	221,156	227,258	216,762		Verreich auch der Verreich auch der St
 2011	2012	2013	2014	2015	2016

Non REC Eligible Generation

Extra Apprenticeship Credit
Distributed Generation Bonus
Total Quantity from Non REC Eligible Generation

Total Quantity from Non REC Eligible Generation

2011	2012	2013	2014	2015	2016
-	-	-	~	_	-
-	-	-	-	-	-

REC Sales / Transfers

Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized

2011	2012	2013	2014	2015	2016

Adjustments

2011 Surplus Applied to 2012
2012 Surplus Applied to 2011
2012 Surplus Applied to 2013
2013 Surplus Applied to 2012
2013 Surplus Applied to 2014
2014 Surplus Applied to 2013
2014 Surplus Applied to 2015
2015 Surplus Applied to 2014
2015 Surplus Applied to 2016
Net Surplus Adjustments

Adjustment for Events Beyond Control

Contribution to RCW 19.285 Compliance

2011	2012	2013	2014	2015	201
18,896	18,896		100		
-	17,609	17,609			
	•	17,896	17,896		
		-	11,236	11,236	
			NAME OF THE PARTY	0404444104404040444444	
(18,896)	1,287	(287)	6,660		akantar arantar perpenana permanan
	18 896	17 609	24.052	11.236	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,

Facility Name: Leaning Juniper MWh Allocated to WA Compliance 2015 2016 2012 2013 2014 Total MWh Produced / Purchased from Leaning Juniper 234,789 190.905 206,164 215.245 100% Percent of MWh Qualifying Under RCW 19.285 100% 100% 100% 100% 100% Percent of Qualifying MWh Allocated to WA 8% 8% 8% 8% 8% Eligible MWh Available for RCW 19.285 Compliance 18,530 15,200 16,235 17,270 Non REC Eligible Generation 2011 2012 2013 2014 2016 Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2011 2012 2013 2014 2015 2016 Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Adjustments 2011 2012 2013 2014 2015 2016 2011 Surplus Applied to 2012 18,530 18,530 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 15,200 15,200 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 16,235 16,235 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 17,270 17,270 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 **Net Surplus Adjustments** (18,530)3,330 (1,035)(1,035)Adjustment for Events Beyond Control Contribution to RCW 19.285 Compliance (0)18,530 15,200 16,235 17,270 **Facility Name:** Marengo I MWh Allocated to WA Compliance 2014 2015 2016 2011 2012 2013 Total MWh Produced / Purchased from Marengo I 403,408 358,669 331,240 367,390 Percent of MWh Qualifying Under RCW 19.285 100% 100% 100% 100% 100% 100% Percent of Qualifying MWh Allocated to WA 8% 8% 8% 28,557 Eligible MWh Available for RCW 19.285 Compliance 31,837 26,084 29,478 Non REC Eligible Generation 2011 2012 2013 2014 2015 2016 Extra Apprenticeship Credit **Distributed Generation Bonus** Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2011 2012 2013 2014 2015 2016 Quantity of RECs Sold **Bonus Incentives Transferred** Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Adjustments 2014 2016 2011 2012 2013 2015 2011 Surplus Applied to 2012 31,837 31,837 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 28,557 28,557 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 26,084 26,084 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 29,478 29,478 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 (3,393) **Net Surplus Adjustments** (31,837) 3,280 2,473 Adjustment for Events Beyond Control Contribution to RCW 19.285 Compliance 0 31,837 28,557 26,084 29,478

acility Name:		<u> </u>					
Wh Allocated to WA Compliance	!	2011	2012	2013	2014	2015	2016
Total MWh Produced / Purchased	from Marengo II	194,378	177,552	154,612	174,766		
Percent of MWh Qualifying Under	l l	100%	100%	100%	100%		
Percent of Qualifying MWh Alloca		8%	8%	8%	8%	THE RESERVE AND ADDRESS OF THE PARTY OF THE	
Eligible MWh Available for RCW 1	19.285 Compliance	15,341	14,137	12,175	14,022		
n REC Eligible Generation		2011	2012	2013	2014	2015	2016
Extra Apprenticeship Credit		- 1		-	-	-	
Distributed Generation Bonus Total Quantity from Non REC Eligi	ible Generation	-	-	-	-	-	
rotar quantity from from fize Engl	ible Generation						
C Sales / Transfers	ı	2011	2012	2013	2014	2015	2016
Quantity of RECs Sold Bonus Incentives Transferred	}						
Bonus Incentives Not Realized							
Total Sold / Transferred / Unreali	zed l	-	·	-	_		
iustmants		2044	2042	2042	2044	2045	2016
justments 2011 Surplus Applied to 2012	[2011	2012 15,341	2013	2014	2015	2016
2012 Surplus Applied to 2011							
2012 Surplus Applied to 2013			14,137	14,137			
2013 Surplus Applied to 2012	- Daniel of the Control of the Contr	- 10 - 2	-				
2013 Surplus Applied to 2014				12,175	12,175		
2014 Surplus Applied to 2013				-			
2014 Surplus Applied to 2015					14,022	14,022	
2015 Surplus Applied to 2014							
2015 Surplus Applied to 2016 Net Surplus Adjustments	Į	(15,341)	1,204	1,961	(1,847)		
		·//			\-,,		
Adjustment for Events Beyond Co	ntrol [
ntribution to RCW 19.285 Comp	liance [(0)	15,341	14,137	12,175	# C TIME # 10 PROFE # 10 PROFE # 16 PROFE # 16	10000 N 10000 N 10 1000 N 10 1000 N
		ndfarm - REC Only		14,137	12,175		2000
cility Name: Ber	nnett Creek Win	ndfarm - REC Only		2013	2014	2015	2016
	nnett Creek Win	2011 12,259				2015	2016
cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under	nnett Creek Win	2011 12,259 100%				2015	2016
cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat	from Bennett Creek V RCW 19.285	2011 12,259 100% 100%				2015	2016
cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1	from Bennett Creek V RCW 19.285	2011 12,259 100%	2012	2013	2014		2016
cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1	from Bennett Creek V RCW 19.285	2011 12,259 100% 100% 12,259 2011	2012	2013	2014	2015	2016
cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 In REC Eligible Generation Extra Apprenticeship Credit	from Bennett Creek V RCW 19.285	2011 12,259 100% 100% 12,259 2011	2012	2013	2014	2015	
Cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011	2012	2013	2014	2015	
Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 THEC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - -	2012	2013	2014	2015	2016
Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 THEC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligit E Sales / Transfers	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011	2012	2013	2014	2015	
Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 TREC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - -	2012	2013	2014	2015	2016
Cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 The REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi E Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012	2013	2014	2015	2016
Vh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 In REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi E Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - -	2012	2013	2014	2015	2016
Cility Name: Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 In REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi C Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012	2013	2014	2015 2015	2016
Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 IN REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi C Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Unrealized Total Sold / Transferred / Unrealized Total Surplus Applied to 2012	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012 - 2012 - 2012	2013	2014	2015	2016
Cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 THEC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi C Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Total Sold / Transferred / Unrealized Sustments 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012 - 2012 - 2012 - 2012	2013	2014	2015	2016
Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 IN REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi E Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Ustrents 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012 - 2012 - 2012 - 2012 - 2012	2013	2014	2015	2016
Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 IN REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi E Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Ustments 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2013	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012 - 2012 - 2012 - 2012 - 2012 - 2012	2013	2014	2015	2016
Cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 In REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi C Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized ustments 2011 Surplus Applied to 2012 2012 Surplus Applied to 2013 2013 Surplus Applied to 2012 2013 Surplus Applied to 2012 2013 Surplus Applied to 2012	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012 - 2012 - 2012 - 2012 - 2012	2013	2014	2015	2016
Cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 In REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi C Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Justments 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2012 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 2014 Surplus Applied to 2014 2014 Surplus Applied to 2014	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012 - 2012 - 2012 - 2012 - 2012	2013	2014	2015 - 2015	2016
Cility Name: Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 In REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi C Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Instruction 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2014 2014 Surplus Applied to 2014 2014 Surplus Applied to 2013	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012 - 2012 - 2012 - 2012 - 2012	2013	2014	2015	2016
Cility Name: Ber Wh Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 The REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi E Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized ustments 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2014 2014 Surplus Applied to 2014	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012 - 2012 - 2012 - 2012 - 2012	2013	2014	2015 - 2015	2016
Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized University of RECs Sold Bonus Incentives Not Realized Total Sold / Transferred / Unrealized University Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2014 2014 Surplus Applied to 2013 2014 Surplus Applied to 2013 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 2015 Surplus Applied to 2015	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 12,259 2011 - 2011	2012 - 2012 - 2012 - 2012 - 2012	2013	2014	2015 - 2015	2016
John Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 IN REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi I Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Total Sourplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2014 2014 Surplus Applied to 2014 2014 Surplus Applied to 2015 2015 Surplus Applied to 2014	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 100% 2011 2011 12,259 2011	2012 - 2012 - 2012 - 2012 - 2012	2013	2014	2015 2015 2015	2016
Illity Name: Ber In Allocated to WA Compliance Total MWh Produced / Purchased Percent of MWh Qualifying Under Percent of Qualifying MWh Allocat Eligible MWh Available for RCW 1 In REC Eligible Generation Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligi I Sales / Transfers Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Un	from Bennett Creek V RCW 19.285 ted to WA 9.285 Compliance	2011 12,259 100% 100% 100% 2011 2011 12,259 2011	2012 - 2012 - 2012 - 2012 - 2012	2013	2014	2015 2015 2015	2016

Hot Springs Windfarm - REC Only **Facility Name:** MWh Allocated to WA Compliance 2012 2013 2014 2015 2016 Total MWh Produced / Purchased from Hot Springs Wir 7,963 Percent of MWh Qualifying Under RCW 19.285 100% Percent of Qualifying MWh Allocated to WA 100% Eligible MWh Available for RCW 19.285 Compliance 7,963 Non REC Eligible Generation 2011 2012 2013 2014 2015 2016 Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2011 2012 2013 2014 2015 2016 Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Adjustments 2011 2012 2013 2014 2015 2016 2011 Surplus Applied to 2012 7,963 7,963 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 **Net Surplus Adjustments** (7,963)7,963 Adjustment for Events Beyond Control Contribution to RCW 19.285 Compliance 7,963 **Facility Name:** *Tuana Springs - REC Only MWh Allocated to WA Compliance 2015 2012 2013 2014 2016 Total MWh Produced / Purchased from *Tuana Springs - REC Only 29,430 32,556 35,021 Percent of MWh Qualifying Under RCW 19.285 100% 100% 100% Percent of Qualifying MWh Allocated to WA 100% 100% 100% Eligible MWh Available for RCW 19.285 Compliance 29,430 32.556 35,021 Non REC Eligible Generation 2012 2014 2015 2016 Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2011 2012 2013 2014 2015 2016 Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Adjustments 2011 2012 2013 2014 2015 2016 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 17,177 17,177 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 6,731 6,731 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 Net Surplus Adjustments (17,177) 10,446 6,731

12,253

43,002

41,752

Adjustment for Events Beyond Control

Contribution to RCW 19.285 Compliance

Facility Name: Wanapum (Upgrade) MWh Allocated to WA Compliance 2012 2013 2014 2015 2016 2011 Total MWh Produced / Purchased from Wanapum (Upgrade) 8,509 8,015 6,194 Percent of MWh Qualifying Under RCW 19.285 100% 100% 0% 0% Percent of Qualifying MWh Allocated to WA 8% 8% 8% 8% Eligible MWh Available for RCW 19.285 Compliance 631 678 Non REC Eligible Generation 2012 2013 2015 2011 2014 2016 Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2011 2012 2013 2014 2015 2016 Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Adjustments 2011 2012 2013 2014 2015 2016 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 **Net Surplus Adjustments** Adjustment for Events Beyond Control Contribution to RCW 19.285 Compliance 678 631 **Facility Name:** Prospect 2 (Upgrade 1999) MWh Allocated to WA Compliance 2012 2013 2014 2015 2016 Total MWh Produced / Purchased from Prospect 2 (Upgrade 1999) 4 118 3,722 3,469 Percent of MWh Qualifying Under RCW 19.285 100% 100% 100% 100% 100% Percent of Qualifying MWh Allocated to WA 8% 8% 8% 8% Eligible MWh Available for RCW 19.285 Compliance 328 293 278 Non REC Eligible Generation 2011 2012 2013 2014 2015 2016 Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2011 2012 2013 2014 2015 2016 Quantity of RECs Sold **Bonus Incentives Transferred** Bonus Incentives Not Realized Total Sold / Transferred / Unrealized **Adjustments** 2011 2012 2013 2014 2015 2016 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 **Net Surplus Adjustments** Adjustment for Events Beyond Control Contribution to RCW 19.285 Compliance

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Lemolo 1 (Upgrade 2003) **Facility Name:** MWh Allocated to WA Compliance 2012 2013 2014 2015 2016 Total MWh Produced / Purchased from Lemolo 1 (Upgrade 2003) 17,021 12,661 14,311 100% 100% Percent of MWh Qualifying Under RCW 19.285 100% 100% 100% Percent of Qualifying MWh Allocated to WA 8% 8% 8% 8% 1.148 1.355 997 Eligible MWh Available for RCW 19.285 Compliance Non REC Eligible Generation 2011 2012 2013 2014 2015 2016 Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2012 2013 2014 2015 2016 2011 Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized 2012 2014 2015 2016 Adjustments 2011 2013 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 **Net Surplus Adjustments** Adjustment for Events Beyond Control Contribution to RCW 19.285 Compliance 1,355 997 1,148 JC Boyle (Upgrade 2005) **Facility Name:** MWh Allocated to WA Compliance 2015 2016 2012 2013 2014 Total MWh Produced / Purchased from JC Boyle (Upgrade 2005) 3,462 2,402 2,295 100% Percent of MWh Qualifying Under RCW 19.285 100% 100% 100% 100% Percent of Qualifying MWh Allocated to WA 8% 8% 8% 8% Eligible MWh Available for RCW 19.285 Compliance 276 189 184 Non REC Eligible Generation 2011 2012 2013 2014 2015 2016 Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2011 2012 2013 2014 2015 2016 Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Adjustments 2013 2014 2015 2016 2011 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 **Net Surplus Adjustments Adjustment for Events Beyond Control** Contribution to RCW 19.285 Compliance 276 189 184

Lemolo 2 (Upgrade 2009) **Facility Name:** MWh Allocated to WA Compliance 2012 2013 2014 2015 2016 Total MWh Produced / Purchased from Lemolo 2 (Upgrade 2009) 1,355 1,781 1,290 Percent of MWh Qualifying Under RCW 19.285 100% 100% 100% 100% 100% 8% Percent of Qualifying MWh Allocated to WA 8% 8% 8% 109 Eligible MWh Available for RCW 19.285 Compliance 142 102 Non REC Eligible Generation 2011 2012 2013 2014 2016 Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2011 2012 2013 2014 2015 2016 Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized **Adjustments** 2011 2012 2013 2014 2015 2016 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 **Net Surplus Adjustments** Adjustment for Events Beyond Control Contribution to RCW 19.285 Compliance 142 102 109 **Facility Name: Wolverine Creek** MWh Allocated to WA Compliance 2013 2016 2011 2012 2014 2015 Total MWh Produced / Purchased from Wolverine Creek 100% Percent of MWh Qualifying Under RCW 19.285 100% 100% 100% Percent of Qualifying MWh Allocated to WA 0% 0% 8% Eligible MWh Available for RCW 19.285 Compliance Non REC Eligible Generation 2011 2012 2013 2014 2015 2016 Extra Apprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2013 2011 2012 2014 2015 2016 Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Adjustments 2013 2014 2015 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 **Net Surplus Adjustments** Adjustment for Events Beyond Control Contribution to RCW 19.285 Compliance

Priest Rapids (Upgrade) **Facility Name:** MWh Allocated to WA Compliance 2015 2016 2012 2013 2014 Total MWh Produced / Purchased from Priest Rapids (Upgrade) 6,981 Percent of MWh Qualifying Under RCW 19.285 0% 0% Percent of Qualifying MWh Allocated to WA Eligible MWh Available for RCW 19.285 Compliance Non REC Eligible Generation 2013 2015 2016 2011 2012 2014 ExtraApprenticeship Credit Distributed Generation Bonus Total Quantity from Non REC Eligible Generation **REC Sales / Transfers** 2011 2012 2013 2014 2015 2016 Quantity of RECs Sold Bonus Incentives Transferred Bonus Incentives Not Realized Total Sold / Transferred / Unrealized Adjustments 2011 2012 2013 2014 2015 2016 2011 Surplus Applied to 2012 2012 Surplus Applied to 2011 2012 Surplus Applied to 2013 2013 Surplus Applied to 2012 2013 Surplus Applied to 2014 2014 Surplus Applied to 2013 2014 Surplus Applied to 2015 2015 Surplus Applied to 2014 2015 Surplus Applied to 2016 **Net Surplus Adjustments** Adjustment for Events Beyond Control

Contribution to RCW 19.285 Compliance

Compliance Contribution by Generation Type

Wind
Solar
Water (Incremental Hydro)
Biomass
Geothermal
Landfill Gas
Sewage Treatment Gas
Wave, Ocean, Tidal
Biodiesel Fuel

2011	2012	2013	2014	2015
(0)	117,079	118,505	120,299	
•	-	-	-	
-	2,778	2,212	1,719	-
*	-	-	-	-
-	-	-	-	-
*	-	-	-	-
-	-	-	-	-
-		-	-	
-	-	-	-	-