

PACIFICORP'S 2012 Preliminary Annual 33% RPS Compliance Report

Narrative Reporting Requirements

I. Introduction

The following sets forth the supplementary material needed to meet the requirements set forth in Public Utilities Code Section 399.13(a)(3) for PacifiCorp's 2012 Preliminary Annual 33% RPS Compliance Report.

II. Narrative Reporting Requirements – Eligible Renewable Energy Resources

Pursuant to Public Utilities Code Section 399.13(a)(3), each retail seller must include the following narrative information in each annual compliance report and in the final report for each compliance period:

1. The status of any necessary siting and permitting approvals from federal, state, and local agencies for those eligible renewable energy resources procured by the retail seller that have not yet attained their commercial on-line dates.

Response:

All eligible renewable resources included in PacifiCorp's 2012 Preliminary Annual 33% RPS Compliance Report have been declared commercially operable.

2. Identification of all procurement from eligible renewable energy resources located outside California and within the WECC during the period covered by the report.

Response:

Please refer to Table 1 that lists the eligible renewable energy resources that are located outside of California and within the WECC that are included in PacifiCorp's 2012 Preliminary Annual 33% RPS Compliance Report. Additional information about the facilities identified below is included in the "Procurement Detail" tab of PacifiCorp's 2012 Preliminary Annual 33% RPS Compliance Report.

Table 1		
Facility Name	Facility City	Facility State
Ashton	Fremont	ID
Bend	Bend	OR
Big Fork	Big Fork	MT
Blundell I	Milford	UT
Blundell II	Milford	UT
Campbell Hill - Three Buttes	Glenrock	WY
Chevron Casper Wind Farm	Evansville	WY

Table 1		
Facility Name	Facility City	Facility State
Clearwater 1	Idleld Park	OR
Clearwater 2	Idleld Park	OR
Cutler	Collinston	UT
Dillard Cogeneration Facility	Dillard	OR
Dunlap I	Medicine Bow	WY
Eagle Point	Eagle Point	OR
Fish Creek	Idleld Park	OR
Foote Creek 1	McFadden	WY
Fountain Green	Fountain Green	UT
Glenrock I	Glenrock	WY
Glenrock III	Glenrock	WY
Goodnoe Hills	Goldendale	WA
Granite	Salt Lake City	UT
Gunlock	Veyo	UT
High Plains	Rock River	WY
Hill Air Force Base	Hill AFB	UT
J BAR 9 Ranch	Park	WY
Last Chance	Grace	ID
Leaning Juniper	Arlington	OR
Marengo	Dayton	WA
Marengo II	Dayton	WA
McFadden Ridge	Rock River	WY
Meadow Creek Project	Idaho Falls	ID
Mountain Wind I	Fort Bridger	WY
Mountain Wind II	Fort Bridger	WY
Olmstead	Orem	UT
Oneida	Preston	ID
Paris	Paris	ID
Pioneer	Pioneer	UT
Prospect 1	Prospect	OR
Prospect 3	Prospect	OR
Prospect 4	Jackson County	OR
Rock River 1	McFadden	WY
Rolling Hills	Glenrock	WY
Sand Cove	Veyo	UT
Seven Mile Hill I	Medicine Bow	WY
Seven Mile Hill II	Medicine Bow	WY
Slide Creek	Idleld Park	OR
Snake Creek	Herber City	UT
Soda	Soda Springs	ID

Table 1		
Facility Name	Facility City	Facility State
Soda Springs	Idleyld Park	OR
Stairs	Salt Lake City	UT
Top of the World	Glenrock	WY
Veyo	Veyo	UT
Viva Naughton	Kemmerer	WY
Wallowa Falls	Joseph	OR
Weber	S. Ogden	UT
Wolverine Creek	Bingham/Bonneville County	ID

3. Identification of all procurement of unbundled renewable energy credits (RECs) during the period covered by the report.

Response:

No procurement of unbundled renewable energy credits is included in PacifiCorp's 2012 Preliminary Annual 33% RPS Compliance Report.

4. Recommendations to remove impediments to making progress toward achieving the renewable energy resources procurement requirements established by statute and implemented by Commission decision.

Response:

PacifiCorp does not anticipate significant potential compliance delays, and therefore has no recommendations to remove impediments to making progress toward achieving the renewable energy resources procurement requirements.

III. Additional Narrative Reporting Requirements – Transmission Planning

Each retail seller that is also an electrical corporation must, in addition to the four items set forth above, include the following narrative information in each annual compliance report and in the final report for each compliance period:

1. The current status and progress made during the prior year toward construction of, and upgrades to, transmission and distribution facilities and other electrical system components owned by that electrical corporation to interconnect eligible renewable energy resources and to supply the electricity generated by those resources to load. The narrative must specifically include, but is not limited to, the status of planning, siting, and permitting of transmission facilities by federal, state, and local agencies.

Response:

The Company is a member of the Northern Tier Transmission Group (NTTG), the planning entity through which the Company demonstrates compliance with the regional planning requirements of FERC Order No. 890. NTTG is currently working on the 2012-2013 Biennial Transmission Plan that provides a regional perspective on the incremental transmission required to efficiently meet the growing load and resource needs of the region. The report is based on a roll-up of each NTTG transmission provider's local transmission plan, and generation assumptions including resources necessary to meet all applicable state renewable portfolio standards (RPS), including California's 33%-by-2020 standard. Associated with this is the ongoing regional and interregional development of the Order No. 1000 Attachment K Tariff filings. PacifiCorp filed its regional compliance filing with the FERC on October 10, 2012 and the interregional filing on May 10, 2013, both of which outline interregional coordination of transmission plans and cost allocation.¹

PacifiCorp's Energy Gateway transmission projects, included in the Company's 2013 IRP, the NTTG's regional transmission plan, and the Western Electricity Coordinating Council's 2022 long-term ten-year transmission plan, play an important role in the Company's commitment to provide safe, reliable, reasonably priced electricity to meet the needs of customers. Energy Gateway's design and extensive footprint provides needed system reliability improvements and supports the development of a diverse range of cost-effective resources required for meeting customers' energy needs, including needs driven by California and other states' RPS requirements.

The first major segment of Energy Gateway—the Populus-to-Terminal segment—was placed into service in November 2010, and the second major segment—the Mona-to-Oquirrh segment—was placed into service in May 2013. The federal permit for Sigurd-to-Red Butte was issued December 7, 2012, the Certificate of Public Convenience and Necessity was issued by the Utah Public Service Commission on March 15, 2013, and construction activities began in April 2013 with a projected completion date of June 2015. Outreach, siting and permitting processes continue for additional transmission segments, including Gateway West and Gateway South. On April 26, 2013, the Bureau of Land Management published the Final Environmental Impact Statement for the Gateway West project in the Federal Register and a record of decision is expected in late 2013. The Energy Gateway projects are necessary to reliably move network resources to network loads as described in PacifiCorp's 2013 IRP. See Chapters 4 and 9 of PacifiCorp's 2013 IRP, for detailed background, status and schedule information for the Energy Gateway expansion plan.

¹ FERC Docket No.s ER13-64 and ER13-1449, respectively.