

# **PACIFICORP'S 2014 Preliminary Annual 33% RPS Compliance Report**

## **Narrative Reporting Requirements**

### **I. Introduction**

The following contains the supplementary material needed to meet the requirements set forth in Public Utilities Code Section 399.13(a)(3) for PacifiCorp's 2014 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 2014 Preliminary Annual 33% RPS Compliance Report have been declared commercially operable, with the exception of the following:

#### Executed – project not yet commercially operable

- Pioneer Wind Park I LLC (COD June 2016)
- Pavant Solar II LLC (COD December 2016)
- Granite Mountain East LLC (COD August 2016)
- Granite Mountain West LLC (COD September 2016)
- Iron Springs Solar LLC (COD August 2016)
- OR Solar 1, LLC – Sprague River (COD December 2016)
- OR Solar 2, LLC – Agate Bay (COD December 2016)
- OR Solar 3, LLC – Turkey Hill (COD December 2016)
- OR Solar 4, LLC – Bly (COD December 2016)
- OR Solar 5, LLC – Merrill (COD December 2016)
- OR Solar 6, LLC – Lakeview (COD December 2016)
- OR Solar 7, LLC – Jacksonville (COD December 2016)
- OR Solar 8, LLC – Dairy (COD December 2016)
- Woodline Solar, LLC (COD December 2017)
- Ewauna Solar 2, LLC (COD December 2017)
- Collier (COD December 2016)
- Merrill Solar (COD December 2016)
- Pendleton Solar (COD December 2016)

Executed – project delayed – not yet commercially operable

- Latigo Wind Park LLC (COD December 2015)

Terminated

- Blue Mountain Power Partners LLC

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 2014 Preliminary Annual 33% RPS Compliance Report. For the procurement by resource, please refer to the Procurement Detail tab in PacifiCorp's 2014 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
Clearwater 1	Idleyld Park	OR
Clearwater 2	Idleyld Park	OR
Cutler	Collinston	UT
Dillard Cogeneration Facility	Dillard	OR
Dunlap I	Medicine Bow	WY
Eagle Point	Eagle Point	OR
Fish Creek	Idleyld 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
Granite Mountain Solar – East	Cedar City	UT
Granite Mountain Solar – West	Cedar City	UT
Gunlock	Veyo	UT

<b>Table 1</b>		
<b>Facility Name</b>	<b>Facility City</b>	<b>Facility State</b>
High Plains	Rock River	WY
Iron Springs Solar	Cedar City	UT
J BAR 9 Ranch	Park	WY
Last Chance	Grace	ID
Latigo	Monticello	UT
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
Oregon Solar 1, LLC – Sprague River	Sprague River	OR
Oregon Solar 2, LLC – Sprague River	Eagle Point	OR
Oregon Solar 3, LLC – Sprague River	Malin	OR
Oregon Solar 4, LLC – Sprague River	Bly	OR
Oregon Solar 5, LLC – Sprague River	Merrill	OR
Oregon Solar 6, LLC – Sprague River	Lakeview	OR
Oregon Solar 7, LLC – Sprague River	Medford	OR
Oregon Solar 8, LLC – Sprague River	Dairy	OR
Woodline Solar, LLC	Dairy	OR
Ewauna Solar 2, LLC	Klamath Falls	OR
Collier	Bend	OR
Merrill Solar	Merrill	OR
Pendleton Solar	Pendleton	OR
Paris	Paris	ID
Pavant Solar II LLC	Fillmore	UT
Pioneer	Pioneer	UT
Pioneer Wind Project	Converse County	WY
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	Idleyld Park	OR

<b>Table 1</b>		
<b>Facility Name</b>	<b>Facility City</b>	<b>Facility State</b>
Snake Creek	Herber City	UT
Soda	Soda Springs	ID
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	Iona	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 2014 Preliminary Annual 33% RPS Compliance Report. During the fourth quarter of 2015, PacifiCorp intends to issue an RFP seeking proposals from parties interested in providing unbundled RECs that qualify for compliance with the California RPS.

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 Federal Energy Regulatory Commission (FERC) Order No. 890. NTTG is currently working on the 2014-2015 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 Open Access Transmission Tariff (OATT) filings.

PacifiCorp filed its regional compliance filing with the FERC on October 10, 2012 (Regional Filing) and the interregional compliance filing on May 10, 2013 (Interregional Filing) that outlines interregional coordination of transmission plans and cost allocation. On May 17, 2013 the FERC issued an order partially approving PacifiCorp's Regional Filing and requiring further modification of Attachment K of its OATT within sixty days of the issuance of the order. On September 16, 2013, PacifiCorp submitted the regional compliance filing including the required modifications. On April 17, 2014, the FERC issued an order accepting the OATT revisions in part and requiring further modification and a compliance filing due within sixty days of the issuance of the order. On June 13, 2014 PacifiCorp submitted the compliance filing addressing the April 17, 2014 order. On March 24, 2015, the FERC issued an order accepting the Regional Filing.

On December 18, 2014, FERC issued an order approving PacifiCorp's Interregional Filing with required modifications as requested by FERC to specifically align with changes FERC ordered as part of its review of the California Independent System Operator's interregional filing with a compliance filing due sixty days after the issuance of the order. On February 17, 2015 PacifiCorp submitted the Interregional compliance filing addressing the December 18, 2014 order. On June 1, 2015, FERC issued an order accepting the Interregional Filing.

PacifiCorp's Energy Gateway transmission projects, considered in the Company's 2015 IRP, in NTTG's regional transmission plan and in the Western Electricity Coordinating Council's (WECC) 2024 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 – Populus to Terminal – was placed into service in November 2010, and the second major segment – Mona to Oquirrh – was placed into service in May 2013. The third major segment – Sigurd to Red Butte – was placed into service in May 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 was issued November 2013 for eight of the ten segments. A record of decision on the remaining two segments across Idaho is anticipated in July 2016. On February 21, 2014, the Bureau of Land Management published the Draft Environmental Impact Statement for Gateway South. The Final Environmental Impact Statement is anticipated in the fall of 2015. The Energy Gateway projects are necessary to reliably move network resources to network loads. See Chapters 4 and 9 of PacifiCorp's 2015 IRP for detailed background, status and schedule information for the Energy Gateway expansion plan.