

July 20, 2020

VIA ELECTRONIC FILING

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

**RE: Docket UE-200506
PacifiCorp's 2020 Annual Renewable Portfolio Standard Report—Revised**

PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) submitted its 2020 Annual Renewable Portfolio Standard Report to the Washington Utilities and Transportation Commission (Commission) on June 1, 2020.

The Company is submitting a revised report to correct an allocation error found in the June 1, 2020 submission, and additional edits requested by Commission Staff. Commission Staff also requested inclusion of two new confidential workpapers, which are the 2019 executed REC purchase agreements for Granite Mountain East and West solar resources.

PacifiCorp requests confidential treatment in accordance with WAC 480-07-160. The documents labeled as confidential include confidential information related to renewable energy credits and/or compliance with RCW 19.285. This confidential business information is of significant commercial value, which could expose the Company to competitive injury if disclosure is unrestricted. Accordingly, Pacific Power requests confidential treatment on the basis that the documents contain “valuable commercial information, including trade secrets or confidential marketing, cost, or financial information, or customer-specific usage and network configuration and design information,” as provided in RCW 80.04.095 and in accordance with WAC 480-07-160(2)(c).

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

Sincerely,

_____/s/
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Washington Utilities & Transportation Commission

July 20, 2020

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Enclosures:

200506-PPL-RPS-r-7-20-20 (C).zip

200506-PPL-RPS-r-7-20-20 (R).zip

CERTIFICATE OF SERVICE

I hereby certify that I have this day served **PacifiCorp’s 2020 Annual Renewable Portfolio Standard Report—Revised** upon all parties of record in this proceeding, by electronic transmission to the email address(es) of each party or party representative listed in the commission’s master service list for this docket.

**Service List
UE-200506**

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Dated at Portland, Oregon this 20th day of July, 2020.

/s/ _____
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REDACTED



**PacifiCorp
dba Pacific Power & Light Company**

**2020 Renewable Portfolio Standard Report
Washington**

July 20, 2020

REDACTED UNDER WAC 480-07-160

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Introduction

PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) submits this 2020 Annual Renewable Portfolio Standard Report (RPS Report) to the Washington Utilities and Transportation Commission (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 from Docket UE-110523, Order 01 in Docket UE-120813, Order 01 in Docket UE-140802, and Docket UE-131723.

Executive Summary

Under RCW 19.285.040(2)(a) and WAC 480-109-200(1), each qualifying utility must use eligible renewable resources, equivalent renewable energy credits (RECs), or a combination of both to meet annual targets under Washington’s renewable portfolio standard (RPS). As demonstrated in this report, PacifiCorp met the 2019 renewable energy target with a combination of eligible renewable resources and RECs and will use a combination of eligible renewable resources and RECs to supply at least fifteen percent of its average Washington load to satisfy the 2020 renewable energy target.

A summary of the company’s 2019 and 2020 renewable targets and eligible renewable resources and RECs are provided below:

Table 1

PacifiCorp Renewable Target, Eligible Resource and RECs		
	2019	2020
Average Retail Sales (MWh)	4,085,207	4,046,853
Percentage Target	9%	15%
Renewable Target	367,669	607,028
Qualifying Resources & RECs (MWh)	367,669	607,028

The company does not intend to rely on any of the alternative compliance mechanisms provided in WAC 480-109-210 for meeting either the 2019 or 2020 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 utility must calculate its annual target based on its average load for the previous two years. Accordingly, using the average of Washington annual retail loads for the previous two years, Table 2 calculates the company's annual renewable targets for 2019 and 2020.

Table 2

Target Year 2019	
Prior Year Retail Sales (2017)	4,221,298 MWh
Prior Year Retail Sales (2018)	3,949,116 MWh
Average Retail Sales	4,085,207 MWh
Percentage Target	9%
Renewable Target	367,669 MWh/RECs
Target Year 2020	
Prior Year Retail Sales (2018)	3,949,116 MWh
Prior Year Retail Sales (2019)	4,144,590 MWh
Average Retail Sales	4,046,853
Percentage Target	15%
Renewable Target	607,028 MWh/RECs

Renewable Energy Acquired to Meet Renewable Energy Target

PacifiCorp met its 2019 renewable resource target and plans to meet its 2020 renewable resource target with a combination of eligible RECs, company- and third-party-owned wind resources, and hydroelectric facilities with upgrades completed after March 1999. Included with this report as Confidential Attachment A is the Commission's RPS Report Tool, which details the renewable resource targets for 2019 and 2020 and the RECs and renewable resources identified to meet the 2019 and 2020 targets.

PacifiCorp will use the following company- and third-party-owned wind facilities for 2019:

Table 3

Resource Name	Location
Goodnoe Hills	Washington
Leaning Juniper	Oregon
Marengo I	Washington
Marengo II	Washington
Dunlap I	Wyoming
Glenrock Wind I	Wyoming
Campbell Hill/Three Buttes	Wyoming
Top of the World	Wyoming
Seven Mile Hill I	Wyoming

Four of these eight wind facilities are located in the Pacific Northwest. The remainder are located in Wyoming and qualify as eligible to meet Washington's RPS.¹ Descriptions of the projects are referenced in the Supporting Documents for Renewable Report section of this RPS Report and on the company's website.

Additionally, PacifiCorp identified the following upgrades to hydroelectric facilities located in the Pacific Northwest that were completed after March 31, 1999:

Table 4

Resource Name	Upgrade Date
Prospect 2	1999
Lemolo 1	2003
JC Boyle	2005
Lemolo 2	2009

PacifiCorp performed analyses to determine the incremental energy associated these upgrades to hydroelectric facilities, consistent with Method Two in WAC 480-109-200(7)(c). The methodology, described in more detail in Attachment B of this report, is consistent with the

¹ In Docket UE-151162, Order 01, the Commission found all of these resources to be eligible renewable resources under RCW 19.285.030(12)(e).

methodology the company submitted to the Oregon Department of Energy to certify these facilities and calculate the percentage of 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 eligibility was reviewed and made effective once again by the Oregon Department of Energy in December 2015. The company is providing the analyses in Confidential Work Papers—PacifiCorp Hourly Incremental Hydro Analyses.

In January 2017, PacifiCorp contracted to purchase the RECs from six Washington-RPS-eligible solar projects over a consecutive ten-year term.

PacifiCorp also intends to use two new resources to meet its RPS target in 2020. On November 6, 2019, the company executed a single-year, 2020-vintage REC purchase, for Washington only, to address a forecast, short-term compliance shortfall in 2020. These two solar facilities, Granite Mountain East and Granite Mountain West, are located in Salt Lake County, Utah—a state in which PacifiCorp serves retail electrical customers. The facilities were commercially operational September 21, 2016, and September 30, 2016, respectively. The company also purchases the energy from these facilities under a twenty-year qualifying-facility power purchase agreement.² These facilities are registered in the Western Renewable Energy Generation Information System (WREGIS).³

Pages 7-10 of this RPS Report contain information required by Commerce that will be resubmitted to Commerce upon Commission approval of this report. These pages include a summary of the forecasted number of megawatt-hours and RECs to meet the 2020 compliance target.

Please see Table 5 of this report for a summary of PacifiCorp’s expected Washington-allocated resource costs compared to the annual revenue requirement.

² WAC 480-109-060 (12)(e)

³ See Attachment A – RPS Report Tool for WREGIS IDs.

Energy Independence Act (I-937) Commerce Renewable Report – 2020

Energy Independence Act (EIA) **Renewable Energy Report 2020**

Utility	Pacific Power & Light Company
Report Date	June 1, 2020
Utility Contact Name/Dept	Ariel Son
Phone	(503) 813-5410
Email	ariel.son@pacificorp.com, jessica.zahnow@gmail.com

Loads and Resources	
2018 Annual Load (MWh)	3,949,116
2019 Annual Load (MWh)	4,144,590
Average of 2018 & 2019 Annual Loads (MWh)	4,046,853
2020 Renewable Target (% of load)	15%
2020 Eligible Renewable Energy Target (MWh)	607,028
2020 Eligible Renewable Resources and RECs	607,028

2020 Compliance Method:

- RPS Target [RCW 19.285.040(2)(a)]
- Resource Cost [RCW 19.285.050]
- No Load Growth [RCW 19.285.040(2)(d)]

Expenditures on Renewable Resources and RECs - 2020	
Amount invested in incremental cost of eligible renewable resources and the cost of RECs	\$5,710,260
Total annual retail revenue requirement - 2020	\$330,209,153
Investment in renewables and RECs as a percent of retail revenue requirement	1.7%

	Water	Wind	Solar	Geothermal	Landfill Gas	Wave, Ocean, Tidal	Gas from Sewage Treatment	Biodiesel	Biomass	Swamp Biomass (pre-2000)	Apprentice Labor Credit	Distributed Generation Credits
Eligible Renewable Resources (MWh)	1,582	424,936	-	-	-	-	-	-	-	-	-	-
Renewable Energy Credits	-	-	180,510	-	-	-	-	-	-	-	-	-
Total Renewables (MWh+RECs)	1,582	424,936	180,510	-	-	-	-	-	-	-	-	-

2020 Reporting Year:
 This renewable energy report summarizes the eligible renewables resources and renewable energy credits (RECs) that the utility has acquired by January 1, 2020 for the purpose of meeting its Energy Independence Act (EIA) renewables target for 2020. The actual resources and RECs used to comply with the 2020 EIA target may vary from those reported here. Utilities will report in June of 2022 on the actual results for 2020.

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 2020 is 15% 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 2020 target year. Utilities that elect to use a compliance method based on renewable investments must provide additional information demonstrating compliance with that method. Refer to WAC 194-37-110(2) and (3) for specific requirements.

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 – 2020

Renewable Resources

Utility Pacific Power & Light Company
Compliance Year 2020

WREGIS ID	Facility Name	Resource Type	Apprentice Labor Eligibility	Generation Amount (MWh)	Apprentice Labor Amount (MWh equiv.)	Explanatory Notes (as needed)
W536	Goodnoe Hills - Goodnoe Hills	Wind	No	41,836	-	
W200	Leaning Juniper I - Leaning Juniper I	Wind	No	47,926	-	
W185	Marengo - Marengo	Wind	No	67,666	-	
W772	Marengo II - Marengo II	Wind	No	33,925	-	
W1749	Top of the World - Top of the World	Wind	No	69,810	-	
W1687	Dunlap I - Dunlap I	Wind	No	40,628	-	
W964	Glenrock I - Glenrock I	Wind	No	47,182	-	
W1383	Campbell Hill - Campbell Hill	Wind	No	45,256	-	
W975	Seven Mile Hill I - Seven Mile Hill I	Wind	No	30,707	-	
W180	JC Boyle - JC Boyle	Water	No	13	-	
W157	Lemolo 1 - Lemolo 1	Water	No	1,176	-	
W158	Lemolo 2 - Lemolo 2	Water	No	109	-	
W140	Prospect 2 - Prospect 2	Water	No	284	-	

Renewable Energy Credits

Utility Pacific Power & Light Company
Compliance Year 2020

WREGIS ID	Facility Name	REC Vintage (Year)	Resource Type	Apprentice Labor Eligibility	Distributed Generation Eligibility	Quantity RECs	Apprentice Labor Amount MWh equiv.	Distributed Generation Amount MWh equiv.	Explanatory Notes (as needed)
W7039	Adams Solar Center - Adams Solar Center	2019	Solar	No	No	125	-	-	
W7047	Bear Creek Solar Center - Bear Creek Solar Center	2019	Solar	No	No	141	-	-	
W7046	Bly Solar Center - Bly Solar Center	2019	Solar	No	No	119	-	-	
W7044	Elbe Solar Center - Elbe Solar Center	2019	Solar	No	No	125	-	-	
W4942	Granite Mountain East	2020	Solar	No	No	75,000	-	-	
W4943	Granite Mountain West	2020	Solar	No	No	75,000	-	-	
W4619	Pavant Solar, LLC - Pavant Solar, LLC	2021	Solar	No	No	10,000	-	-	
W4938	Enterprise Solar, LLC - Enterprise Solar, LLC	2021	Solar	No	No	20,000	-	-	
				No	No		-	-	

**Redacted Information is Confidential under WAC 480-07-160
Energy Independence Act (I-937) Commerce Renewable Report – 2020**

*Costs for acquired RECs may be provided on an aggregated basis when there are sufficient and multiple contracts to obscure the contract price for any single resource or contract. Costs for acquired RECs from an individual resource may be provided five years from execution of the contract for that resource. The cost of an unbundled REC represents the cost of a resource-independent renewable attribute, and is not indicative of the cost of any given resource type – wind, solar, etc..

Incremental Cost of Renewable Resources

Utility	Pacific Power & Light Company
Compliance Year	2020

Facility Name	WREGIS ID	MWh	Renewable Resource Annual Cost in 2020	Renewable Resource Cost per MWh	Description of Substitute Resource	Substitute Resource Annual Cost in 2020	Substitute Resource Cost per MWh	Incremental Cost of Renewable Resource in 2020
Goodnoe Hills - Goodnoe Hills	W536	41,836	\$714,958	17.09			-	\$714,958
Leaning Juniper I - Leaning Juniper I	W200	47,926	\$876,338	18.29			-	\$876,338
Marengo - Marengo	W185	67,666	\$437,830	6.47			-	\$437,830
Marengo II - Marengo II	W772	33,925	\$410,710	12.11			-	\$410,710
Top of the World - Top of the World	W1749	69,810	\$906,876	12.99			-	\$906,876
Dunlap I - Dunlap I	W1687	40,628	\$527,783	12.99			-	\$527,783
Glenrock I - Glenrock I	W964	47,182	\$612,924	12.99			-	\$612,924
Campbell Hill - Campbell Hill	W1383	45,256	\$587,904	12.99			-	\$587,904
Seven Mile Hill I - Seven Mile Hill I	W975	30,707	\$398,903	12.99			-	\$398,903
JC Boyle - JC Boyle	W180	13	-\$864	(66.44)			-	-\$864
Lemolo 1 - Lemolo 1	W157	1,176	-\$53,191	(45.23)			-	-\$53,191
Lemolo 2 - Lemolo 2	W158	109	-\$7,188	(65.95)			-	-\$7,188
Prospect 2 - Prospect 2	W140	284	-\$11,438	(40.27)			-	-\$11,438
Totals		426,518	\$5,401,546			\$0		\$5,401,546

Cost of Renewable Energy Credits

Utility	Pacific Power & Light Company
Compliance Year	2020

Facility Name	WREGIS ID	REC Vintage (Year)	Number of RECs	Annual Cost of Renewable Energy Credits	Cost per REC	Documentation of the calculation and inputs for percentage of revenue requirement invested in renewables:
Adams Solar Center - Adams Solar Center	W7039	2019	125			
Bear Creek Solar Center - Bear Creek Solar Center	W7047	2019	141			
Bly Solar Center - Bly Solar Center	W7046	2019	119			
Elbe Solar Center - Elbe Solar Center	W7044	2019	125			
Granite Mountain East	W4942	2020	75,000			
Granite Mountain West	W4943	2020	75,000			
Pavant Solar, LLC - Pavant Solar, LLC	W4619	2021	10,000			
Enterprise Solar, LLC - Enterprise Solar, LLC	W4938	2021	20,000			
Total	0	0	180,510	\$308,714		

Alternative Compliance

Under WAC 480-109-210(2)(b), the utility must state in its report if it is relying on one of the alternative compliance mechanisms provided in WAC 480-109-220 instead of meeting its renewable resource target. PacifiCorp has met its 2019 obligations and anticipates meeting its 2020 obligations without the need for an alternative compliance mechanism.

Resource Cost Compared to Annual Retail Revenue Requirement

Under RCW 19.285.070(1), a utility must report the percentage 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 resource that does not qualify as eligible, 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 the EIA, codified in RCW Ch. 19.285, including the application of a new methodology for calculating incremental cost. PacifiCorp performed the incremental cost calculations as defined in WAC 480-109-210; please refer to the company's confidential work paper labeled PacifiCorp Renewable Resource Incremental Cost Methodology.

REC Costs for REC-Only Purchases

The cost of RECs from a 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 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. The cost of RECs from PacifiCorp's resources located outside of the west control area are not included in Washington customers' rates. 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).

PacifiCorp repowered four resources in the west control area in 2019 and 2020—Marengo I, Marengo II, Leaning Juniper, and Goodnoe Hills. These projects underwent a capital upgrade or “repowering” that changed the capacity value, extended useful life, and changed costs and

production tax credits. As of January 1, 2020, repowering was complete at Leaning Juniper and Goodnoe Hills. PacifiCorp will therefore recalculate incremental costs for repowering for those two resources in its 2020 compliance report. It will not recalculate the incremental costs of repowering for Marengo I and Marengo II.

Concurrently with the filing of this RPS Report, PacifiCorp filed a request for a one-time waiver of the requirement in WAC 480-109-210(2)(a)(i) that a utility (1) make a one-time incremental cost calculation for each eligible resource included in a utility’s renewable portfolio standard report, and (2) identify the capacity value of each eligible renewable resource as calculated in the utility’s most recent integrated resource plan (IRP) acknowledged by the Commission. The waiver allows PacifiCorp to provide an updated incremental cost calculation to reflect the repowering of Leaning Juniper and Goodnoe Hills in this RPS Report and to use the capacity value as calculated in the 2019 IRP progress report filed on October 18, 2019, for Goodnoe Hills.⁴

Incremental Costs for Renewable Energy from Incremental Hydroelectric Upgrades

The estimated incremental cost of eligible renewable energy from incremental hydroelectric upgrades represents the calculated levelized cost of each hydroelectric upgrade at the time of investment in the upgrade, compared to an equivalent amount of the lowest-reasonable-cost resource available to the utility at the time of the eligible resource’s acquisition.

The company’s work paper provided with this report and labeled PacifiCorp Renewable 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 2019 and 2020.

Revenue Requirement

The revenue requirement amounts used in this Renewable Report are from the most recent general rate case, Docket UE-152253. The revenue requirement in both 2019 and 2020 is \$330,209,153, unchanged from 2018.⁵

Resource Costs Compared to Revenue Requirement

Table 5 shows the expected Washington-allocated resource costs (incremental cost of eligible renewable resources and the cost of RECs) compared to the annual revenue requirements for 2019 and 2020.

⁴ See PacifiCorp Renewable Resource Cost Analysis work paper for more detail.

⁵ The revenue requirement number for 2018 reported in the company’s 2018 report was \$346,967,880. This number has been revised to reflect the impacts of the Tax Cuts and Jobs Act.

Table 5

Calendar Year	Total Washington Allocated Resource Costs	Washington Annual Revenue Requirement	% of Washington Expected Allocated Resource Costs to Annual Revenue Requirement
2019	\$ 1,193,422	\$ 330,209,153	0.36%
2020	\$ 4,824,030	\$ 330,209,153	1.46%

Based on this analysis, the company is able to meet its compliance obligations without exceeding the threshold of four percent of annual revenue requirement.

Multistate Allocations

Under WAC 480-109-210(e)(i), a utility serving retail customers in more than one state must allocate RECs consistent with the utility’s most recent Commission-approved inter-jurisdictional allocation methodology. This section explains how the company applied the current inter-jurisdictional allocation methodology to arrive at the number of RECs allocated to Washington customers.

PacifiCorp is a multi-jurisdictional utility providing electric retail service to more than 1.9 million customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. Approximately 133,000 of these customers are located in Washington.

PacifiCorp allocates RECs to its states consistent with the inter-jurisdictional allocation methodologies approved in each state. California uses the 2010 Protocol inter-jurisdictional allocation methodology; Idaho, Oregon, Utah and Wyoming currently use the 2017 Protocol inter-jurisdictional allocation methodology. Both the 2010 and 2017 Protocol allocate 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 eight percent (*i.e.* Washington is approximately eight percent of PacifiCorp’s six-state system).

In Washington, however, PacifiCorp will use the West Control Area Inter-Jurisdictional Allocation Methodology (WCA) through 2020. This methodology allocates generation resources located in the west control area (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 (California, Oregon, and Washington) contribution to PacifiCorp’s energy and capacity requirements for the west control area. Washington’s CAGW factor is approximately 22 percent (*i.e.*, Washington is approximately 22 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 22 percent, of generation resources located in the west control area. Accordingly, Washington customers are entitled to approximately 22 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 state's SG factor. Using this process, Washington receives approximately eight percent of RECs from resources in the west-control-area.

The west control area contains the following eligible resources:

- Goodnoe Hills (wind)
- Leaning Juniper (wind)
- Marengo I (wind)
- Marengo II (wind)
- 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 resources in the west control area (approximately eight percent) and Washington's CAGW share (approximately 22 percent) by providing Washington RECs from other eligible resources. The EIA allows PacifiCorp to use RECs from PacifiCorp facilities in other states where PacifiCorp makes retail sales.⁶ 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 REC purchases, but the total RECs will equal Washington's CAGW share of resources in the west control area.

If approved in the current general rate case, docket UE-191024, beginning January 1, 2021, Washington will be allocated a system generation share of all PacifiCorp's non-emitting, non-qualifying-facility resources under the Washington Inter-Jurisdictional Allocation Methodology (WIJAM).

In 2020, PacifiCorp plans to use company-owned generation from the following resources to provide Washington with its full CAGW allocation:

- Top of the World (wind – Wyoming)
- Dunlap I (wind – Wyoming)
- Glenrock I (wind – Wyoming)
- Campbell Hill/Three Buttes (wind – Wyoming)
- Seven Mile Hill I

⁶ RCW 19.285.030(12)(e)

PacifiCorp does not plan to use any third-party REC purchases to fill Washington’s CAGW allocation in 2020. Table 6 summarizes how PacifiCorp plans to supply Washington with its CAGW share of renewable generation in 2020.

Table 6: Allocation of PacifiCorp’s Eligible Generation to Washington*

	2020
Total 2020 WCA Eligible Generation (Projected)	1,278,768
Washington CAGW Factor ⁷	22.405%
Washington CAGW Allocation ⁸	286,507
SG Allocation of WCA Resources	101,188
CAGW-SG Delta from Other Eligible (Company) Resources	185,319
Adjustments from Eligible (Company) Resources	140,011
Adjustments from Purchased RECs	180,510
Final Allocation (CAGW + Adjustments)	607,028

*see Attachment C, “(2)(a)(ii)Annual-2020, estimate” tab for detail.

Any REC purchases necessary for RPS compliance in excess of Washington’s CAGW share of resources in the west control area will be reflected in Washington customers’ rates.⁹ This includes RECs already delivered per January 2017 and November 2019 solar contracts. This treatment ensures that Washington customers receive an allocation of costs and benefits of RECs proportionate to its share costs for renewable resource reflected in rates.

PacifiCorp follows WREGIS and state RPS requirements to ensure that RECs are never double-counted.

Prior Year Progress

As demonstrated in this report, PacifiCorp met its Washington 2019 RPS compliance target with a combination of eligible renewable resources, REC purchases and renewable energy from hydroelectric facilities with upgrades completed after March 1999. The company set aside the WREGIS certificates for the 2019 compliance target and, upon Commission approval, will retire these WREGIS certificates. The company is providing a listing of the WREGIS certificates that

⁷ Washington’s forecast CAGW factor for 2020.

⁸ Washington’s allocation of all RPS-eligible resources in the west control area (wind and incremental hydroelectric).

⁹ On February 9, 2017, in Docket UE-161067, the Washington Utilities and Transportation Commission approved PacifiCorp’s request seeking cost recovery for its 2016 unbundled REC purchase. On November 8, 2019, PacifiCorp submitted a petition for an order authorizing the company to defer costs associated with the purchase of unbundled RECs necessary for RPS compliance for calendar year 2020 (Docket UE-190929).

have been created in its confidential work papers labeled WREGIS Certificates for Washington Compliance for 2019¹⁰.

The company did not rely on any alternative compliance mechanisms to meet its renewable resource targets for 2019.

Current Year Progress

PacifiCorp plans to meet its Washington 2020 RPS compliance target with a combination of eligible renewable resources, REC purchases and renewable energy from hydroelectric facilities with upgrades completed after March 1999.

The company does not anticipate relying on any alternative compliance mechanisms to meet its renewable resource targets for 2020.

Supporting Documents for Renewable Report

Further information about PacifiCorp's renewable portfolio standard resources may be found at: <https://www.pacificorp.com/energy/wind-solar.html>

¹⁰ 2020 certificates used for 2019 compliance, totaling 20,916 MWhs have not yet been created in WREGIS. Q4 2019 certificates totaling 2,864 MWhs for Adams Solar, Bear Creek Solar, Bly Solar, and Elbe Solar have not yet been transferred to the company by the contract counterparty. The counterparty has demonstrated to PacifiCorp their efforts to rectify the issue and delivery of the WREGIS certificates is anticipated to occur upon creation in that system under the Operating Rules by May 30, 2020.

List of Attachments

Attachment A – 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

Attachment C – PacifiCorp Incremental Cost Report (Confidential)

Attachment A

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PacifiCorp

Renewable Report

RPS Reporting Tool

July 20, 2020

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 row represents a different facility.					
	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
Instructions in this section identify the input locations for the 1st facility found in the "Facility Detail" worksheet. Inputs for facilities 2 through 30, also found in the "Facility Detail" worksheet, are identical to facility 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 19.285.040 (2)(i)

Reporting Entity:

PacifiCorp

Reporting Date:

July 20, 2020

RCW 19.285 Compliance Need

Delivered Load to Retail Customers (MWh)
WA State RCW 19.285 Requirement
Quantity Required for Compliance

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Delivered Load to Retail Customers (MWh)	3,984,631	4,005,863	4,041,898	4,092,688	4,117,646	4,108,270	3,981,654	4,221,298	3,949,116	4,144,590	4,224,568
WA State RCW 19.285 Requirement		0%	3%	3%	3%	3%	9%	9%	9%	9%	15%
Quantity Required for Compliance			119,857	120,716	122,019	123,155	370,166	364,047	369,133	367,669	607,028

Eligible Quantity Acquired

Qualifying MWh Allocated to WA
Quantity from Non REC Eligible Generation
Total Quantity Available for RCW 19.285 Compliance

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Qualifying MWh Allocated to WA		104,826	107,711	107,158	114,902	270,792	373,982	285,492	293,213	198,796	503,899
Quantity from Non REC Eligible Generation		-	-	-	-	-	-	-	-	-	-
Total Quantity Available for RCW 19.285 Compliance		104,826	107,711	107,158	114,902	270,792	373,982	285,492	293,213	198,796	503,899

Sales and Transfers

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

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Quantity of RECs Sold		-	-	-	-	-	-	-	-	-	-
Bonus Incentives Transferred		-	-	-	-	-	-	-	-	-	-
Bonus Incentives Not Realized		-	-	-	-	-	-	-	-	-	-
Total Sold / Transferred / Unrealized		-	-	-	-	-	-	-	-	-	-

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
2016 Surplus Applied to 2015
2016 Surplus Applied to 2017
2017 Surplus Applied to 2016
2017 Surplus Applied to 2018
2018 Surplus Applied to 2017
2018 Surplus Applied to 2019
2019 Surplus Applied to 2018
2019 Surplus Applied to 2020
2020 Surplus Applied to 2019
2020 Surplus Applied to 2021
2021 Surplus Applied to 2020

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
2011 Surplus Applied to 2012		(104,826)	104,826								
2012 Surplus Applied to 2011		-	-								
2012 Surplus Applied to 2013			(92,679)	92,679							
2013 Surplus Applied to 2012				-							
2013 Surplus Applied to 2014				(79,121)	79,121						
2014 Surplus Applied to 2013					-						
2014 Surplus Applied to 2015					(72,004)	72,004					
2015 Surplus Applied to 2014						-					
2015 Surplus Applied to 2016						(219,641)	219,957				
2016 Surplus Applied to 2015											
2016 Surplus Applied to 2017							(223,773)	223,773			
2017 Surplus Applied to 2016											
2017 Surplus Applied to 2018								(145,218)	145,218		
2018 Surplus Applied to 2017											
2018 Surplus Applied to 2019									(69,298)	69,298	
2019 Surplus Applied to 2018											
2019 Surplus Applied to 2020											-
2020 Surplus Applied to 2019										99,576	(99,576)
2020 Surplus Applied to 2021											
2021 Surplus Applied to 2020											202,705

Net Surplus Adjustments

		(104,826)	12,147	13,558	7,117	(147,637)	(3,816)	78,555	75,920	168,874	103,129
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Adjustment for Events Beyond Control

		-	-	-	-	-	-	-	-	-	-
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RCW 19.285 Compliance Surplus / (Deficit)

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
RCW 19.285 Compliance Surplus / (Deficit)		0	1	(0)	0	(0)	(0)	1	0	1	1

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

Note 1: Any surplus or deficit in row 43 (RCW 19.285 Compliance Surplus / (Deficit)) is a result of rounding in the Facility Detail tab. The correct target amount of RECs have been/will be retired for all compliance years

PACIFICORP Notes and Assumptions

Retail Sales:

2010 - 2019 actual retail sales. 2020 load forecast based on 2019 IRP progress report.

Facility Generation:

2011 - 2019 is based on actual generation or REC purchase data. Generation forecast begins February 2020.

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 available over the life of the plant. 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.

The forecasts for wind resources include generation attributed to the Company's planned repowering efforts.

Allocation Factors:

2011 - 2019 actual System Generation (SG) and Control Area Generation West (CAGW) allocation factors. Forecast factors (2020 onward).

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.

Facility Name:	Facility WREGIS ID:	Distributed Generation Bonus Eligibility:	Online Date:
Goodnoe Hills	W536	Not Eligible	31-May-08
Leaning Juniper	W200	Not Eligible	14-Sep-06
Marengo I	W185	Not Eligible	1-Aug-07
Marengo II	W772	Not Eligible	28-Jun-08
Bennett Creek Windfarm - REC Only	W542	Not Eligible	30-Sep-08
Hot Springs Windfarm - REC Only	W543	Not Eligible	30-Sep-08
*Tuana Springs - REC Only	W1503	Not Eligible	14-May-10
Wanapum (Upgrade)	NA	Not Eligible	1-Jul-63
Prospect 2 (Upgrade 1999)	W140	Not Eligible	1-Oct-58
Lemolo 1 (Upgrade 2003)	W157	Not Eligible	1-Jul-55
JC Boyle (Upgrade 2005)	W180	Not Eligible	1-Jan-28
Lemolo 2 (Upgrade 2009)	W158	Not Eligible	1-Nov-56
Seven Mile Hill I	W975	Not Eligible	31-Dec-08
Nine Canyon Wind Project - REC Only	W684	Not Eligible	1-Sep-02
Top of the World	W1749	Not Eligible	1-Oct-10
Dunlap I	W1687	Not Eligible	1-Oct-10
Campbell Hill/Three Buttes	W1383	Not Eligible	31-Dec-09
Glenrock Wind I	W964	Not Eligible	31-Dec-08
Rolling Hills	W928	Not Eligible	17-Jan-09
SPI Aberdeen - REC Only	W1640	Not Eligible	15-Mar-03
Hidden Hollow - REC Only	W1634	Not Eligible	11-Oct-05
Fighting Creek - REC Only	W2659	Not Eligible	5-Mar-12
Lower Snake – Phalen Gulch - REC Only	W2670	Not Eligible	29-Feb-12
Elkhorn Valley Wind - REC Only	W186	Not Eligible	20-Nov-07
Condon Wind Power Project - Condon Phase II - REC Only	W833	Not Eligible	1-Jun-02
Condon Wind Power Project - Condon Wind Power Project	W774	Not Eligible	31-Dec-01
Klondike I - Klondike Wind Power LLC - REC Only	W238	Not Eligible	1-Jan-02
Meadow Creek Wind Farm - Five Pine Project - REC Only	W3186	Not Eligible	22-Dec-12
Meadow Creek Wind Farm - North Point Wind Farm - REC	W3185	Not Eligible	11-Dec-12
Nine Canyon Wind Project - Nine Canyon Phase 3 - REC On	W697	Not Eligible	1-May-08
Stateline (WA) - FPL Energy Vansycle LLC - REC Only	W248	Not Eligible	14-Dec-01
Adams Solar	W7039	Not Eligible	27-Jul-18
Bear Creek Solar	W7047	Not Eligible	28-Sep-18
Bly Solar	W7046	Not Eligible	21-Dec-18
Elbe Solar	W7044	Not Eligible	10-Aug-18
Enterprise Solar	W4938	Not Eligible	29-Jul-16
Pavant Solar	W4619	Not Eligible	30-Dec-15
Element Markets - REC Only	TBD	---	
Granite Mountain - East	W4942	Not Eligible	25-Oct-16
Granite Mountain - West	W4943	Not Eligible	25-Oct-16

*Note: Includes 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 Allocated to WA Compliance

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Goodnoe Hills	227,258	216,762	186,746	223,899	191,917	230,513	57,616	269,259	259,455
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%	8%	8%	8%	8%	8%
Eligible MWh Available for RCW 19.285 Compliance	17,896	17,392	15,039	18,292	15,514	18,315	4,421	21,306	20,530

Non REC Eligible Generation

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

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
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 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
 2020 Surplus Applied to 2019
 2020 Surplus Applied to 2021
 2021 Surplus Applied to 2020
 2021 Surplus Applied to 2022

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
2012 Surplus Applied to 2013	17,608								
2013 Surplus Applied to 2012									
2013 Surplus Applied to 2014	17,896	17,896							
2014 Surplus Applied to 2013	-								
2014 Surplus Applied to 2015		11,234	11,234						
2015 Surplus Applied to 2014		-							
2015 Surplus Applied to 2016			5,383	5,383					
2016 Surplus Applied to 2015			-						
2016 Surplus Applied to 2017					-				
2017 Surplus Applied to 2016				-					
2017 Surplus Applied to 2018						-			
2018 Surplus Applied to 2017					-				
2018 Surplus Applied to 2019							-		
2019 Surplus Applied to 2018						-			
2019 Surplus Applied to 2020								-	
2020 Surplus Applied to 2019							-		
2020 Surplus Applied to 2021									-
2021 Surplus Applied to 2020								20,530	20,530
2021 Surplus Applied to 2022									-
Net Surplus Adjustments	(288)	6,662	5,851	5,383	-	-	-	20,530	(20,530)

Adjustment for Events Beyond Control

Adjustment for Events Beyond Control									
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Contribution to RCW 19.285 Compliance

Contribution to RCW 19.285 Compliance	17,608	24,054	20,890	23,675	15,514	18,315	4,421	41,836	-
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Facility Name:

Leaning Juniper

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Leaning Juniper
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
 Eligible MWh Available for RCW 19.285 Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Leaning Juniper	206,164	215,245	188,567	202,605	155,685	201,665	167,178	306,430	299,259
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%	8%	8%	8%	8%	8%
Eligible MWh Available for RCW 19.285 Compliance	16,235	17,270	15,187	16,552	12,585	16,022	12,827	24,247	23,679

Non REC Eligible Generation

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

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
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 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
 2020 Surplus Applied to 2019
 2020 Surplus Applied to 2021
 2021 Surplus Applied to 2020
 2021 Surplus Applied to 2022

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
2012 Surplus Applied to 2013	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			15,187	15,187					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017					-	-			
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018						-			
2018 Surplus Applied to 2017							-		
2018 Surplus Applied to 2019								-	
2019 Surplus Applied to 2018									
2019 Surplus Applied to 2020									-
2020 Surplus Applied to 2019									
2020 Surplus Applied to 2021									-
2021 Surplus Applied to 2020								23,679	23,679
2021 Surplus Applied to 2022									
Net Surplus Adjustments	(1,035)	(1,035)	2,083	15,187	-	-	-	23,679	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	15,200	16,235	17,270	31,739	12,585	16,022	12,827	47,926	23,679
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Facility Name:

Marengo I

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Marengo I
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
 Eligible MWh Available for RCW 19.285 Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Marengo I	331,240	367,390	298,771	356,053	315,543	336,426	145,630	477,310	464,963
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%	8%	8%	8%	8%	8%
Eligible MWh Available for RCW 19.285 Compliance	26,084	29,478	24,062	29,087	25,507	26,729	11,173	37,768	36,791

Non REC Eligible Generation

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

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
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 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
 2020 Surplus Applied to 2019
 2020 Surplus Applied to 2021
 2021 Surplus Applied to 2020
 2021 Surplus Applied to 2022

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
2012 Surplus Applied to 2013	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			24,062	24,062					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017									
2017 Surplus Applied to 2016					-				
2017 Surplus Applied to 2018									
2018 Surplus Applied to 2017						-			
2018 Surplus Applied to 2019									
2019 Surplus Applied to 2018									
2019 Surplus Applied to 2020									
2020 Surplus Applied to 2019							6,893	6,893	
2020 Surplus Applied to 2021									-
2021 Surplus Applied to 2020								36,791	36,791
2021 Surplus Applied to 2022									
Net Surplus Adjustments	2,473	(3,394)	5,416	24,062	-	-	-	43,684	(36,791)

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	28,557	26,084	29,478	53,149	25,507	26,729	18,066	67,666	(36,791)
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Facility Name:

Marengo II

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Marengo II
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
 Eligible MWh Available for RCW 19.285 Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Marengo II	154,612	174,766	137,848	170,369	153,361	164,436	91,366	205,812	222,938
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%	8%	8%	8%	8%	8%
Eligible MWh Available for RCW 19.285 Compliance	12,175	14,022	11,102	13,918	12,396	13,065	7,010	16,285	17,640

Non REC Eligible Generation

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

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
 2016 Surplus Applied to 2015
 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
 2020 Surplus Applied to 2019
 2020 Surplus Applied to 2021
 2021 Surplus Applied to 2020
 2021 Surplus Applied to 2022

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
2012 Surplus Applied to 2013	14,137								
2013 Surplus Applied to 2012									
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			11,102	11,102					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017									
2017 Surplus Applied to 2016					-				
2017 Surplus Applied to 2018									
2018 Surplus Applied to 2017						-			
2018 Surplus Applied to 2019									
2019 Surplus Applied to 2018									
2019 Surplus Applied to 2020									
2020 Surplus Applied to 2019									
2020 Surplus Applied to 2021									-
2021 Surplus Applied to 2020								17,640	17,640
2021 Surplus Applied to 2022									
Net Surplus Adjustments	1,962	(1,847)	2,920	11,102	-	-	-	17,640	(17,640)

Net Surplus Adjustments
 Adjustment for Events Beyond Control

Adjustment for Events Beyond Control									
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Contribution to RCW 19.285 Compliance

Contribution to RCW 19.285 Compliance	14,137	12,175	14,022	25,020	12,396	13,065	7,010	33,925	-
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Facility Name: Bennett Creek Windfarm - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Bennett Creek Windfarm - REC Only			8,656	11,174	9,667	3,216			
Percent of MWh Qualifying Under RCW 19.285			100%	100%	100%	100%			
Percent of Qualifying MWh Allocated to WA			100%	100%	100%	100%			
Eligible MWh Available for RCW 19.285 Compliance	-	-	8,656	11,174	9,667	3,216	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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			8,656	8,656					
2016 Surplus Applied to 2015			-						
2016 Surplus Applied to 2017				11,174	11,174				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018					9,667	9,667			
2018 Surplus Applied to 2017									
2018 Surplus Applied to 2019						3,216	3,216		
Net Surplus Adjustments	-	-	(8,656)	(2,518)	1,507	6,451	3,216		

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	8,656	11,174	9,667	3,216	-	-
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Facility Name: Hot Springs Windfarm - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Hot Springs Windfarm - REC Only			8,028	10,218	8,846	1,923			
Percent of MWh Qualifying Under RCW 19.285			100%	100%	100%	100%			
Percent of Qualifying MWh Allocated to WA			100%	100%	100%	100%			
Eligible MWh Available for RCW 19.285 Compliance	-	-	8,028	10,218	8,846	1,923	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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			8,028	8,028					
2016 Surplus Applied to 2015			-						
2016 Surplus Applied to 2017				10,218	10,218				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018					8,846	8,846			
2018 Surplus Applied to 2017									
2018 Surplus Applied to 2019						1,923	1,923		
Net Surplus Adjustments	-	-	(8,028)	(2,190)	1,372	6,923	1,923	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	8,028	10,218	8,846	1,923	-	-
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Facility Name: *Tuana Springs - REC Only

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from *Tuana Springs - REC Only
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
 Eligible MWh Available for RCW 19.285 Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from *Tuana Springs - REC Only	32,556	35,021							
Percent of MWh Qualifying Under RCW 19.285	100%	100%							
Percent of Qualifying MWh Allocated to WA	100%	100%							
Eligible MWh Available for RCW 19.285 Compliance	32,556	35,021	-	-	-	-	-	-	-

Non REC Eligible Generation

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
2012 Surplus Applied to 2013	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	10,446	6,731	-	-					

Adjustment for Events Beyond Control

Adjustment for Events Beyond Control									
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Contribution to RCW 19.285 Compliance

Contribution to RCW 19.285 Compliance	43,002	41,752	-	-	-	-	-	-	-
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1,063 RECs from Power County Wind Park South

Facility Name:

Prospect 2 (Upgrade 1999)

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Prospect 2 (Upgrade 1999)	3,722	3,469	2,802	4,030	4,305	3,347	3,197	3,584	
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%	8%	8%	8%	8%	
Eligible MWh Available for RCW 19.285 Compliance	293	278	226	329	346	266	245	284	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
2013 Surplus Applied to 2012	-								
2013 Surplus Applied to 2013									
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				-					
2016 Surplus Applied to 2015			-						
2016 Surplus Applied to 2017					-				
2017 Surplus Applied to 2016						-			
2017 Surplus Applied to 2018							-		
2018 Surplus Applied to 2017								-	
2018 Surplus Applied to 2019									-
2019 Surplus Applied to 2018									
2019 Surplus Applied to 2020									
Net Surplus Adjustments	-	-	-	-	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	293	278	226	329	346	266	245	284	-
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Facility Name: Lemolo 1 (Upgrade 2003)

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Lemolo 1 (Upgrade 2003)
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
 Eligible MWh Available for RCW 19.285 Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Lemolo 1 (Upgrade 2003)	12,661	14,311	12,553	13,621	17,773	12,686	11,639	14,859	
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%	8%	8%	8%	8%	
Eligible MWh Available for RCW 19.285 Compliance	997	1,148	1,011	1,113	1,438	1,007	893	1,176	-

Non REC Eligible Generation

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

2011 Surplus Applied to 2012
 2012 Surplus Applied to 2011
 2013 Surplus Applied to 2012
 2013 Surplus Applied to 2013
 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
 2016 Surplus Applied to 2015
 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
Net Surplus Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
2013 Surplus Applied to 2012	-								
2013 Surplus Applied to 2013									
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				-					
2016 Surplus Applied to 2015				-					
2016 Surplus Applied to 2017					-				
2017 Surplus Applied to 2016					-				
2017 Surplus Applied to 2018						-			
2018 Surplus Applied to 2017							-		
2018 Surplus Applied to 2019								-	
2019 Surplus Applied to 2018									-
2019 Surplus Applied to 2020									
Net Surplus Adjustments	-	-	-	-	-	-	-	-	-

Adjustment for Events Beyond Control

Adjustment for Events Beyond Control									
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Contribution to RCW 19.285 Compliance

Contribution to RCW 19.285 Compliance	997	1,148	1,011	1,113	1,438	1,007	893	1,176	-
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Facility Name: JC Boyle (Upgrade 2005)

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from JC Boyle (Upgrade 2005)
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
Eligible MWh Available for RCW 19.285 Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from JC Boyle (Upgrade 2005)	2,402	2,295	2,130	2,857	4,238	2,581	3,044	161	
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%	8%	8%	8%	8%	
Eligible MWh Available for RCW 19.285 Compliance	189	184	172	235	342	205	234	13	-

Non REC Eligible Generation

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

2011 Surplus Applied to 2012
 2012 Surplus Applied to 2011
 2013 Surplus Applied to 2012
 2013 Surplus Applied to 2013
 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
 2016 Surplus Applied to 2015
 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
Net Surplus Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
2013 Surplus Applied to 2012	-								
2013 Surplus Applied to 2013									
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				-					
2016 Surplus Applied to 2015				-					
2016 Surplus Applied to 2017					-				
2017 Surplus Applied to 2016					-				
2017 Surplus Applied to 2018						-			
2018 Surplus Applied to 2017							-		
2018 Surplus Applied to 2019								-	
2019 Surplus Applied to 2018									-
2019 Surplus Applied to 2020									
Net Surplus Adjustments	-	-	-	-	-	-	-	-	-

Adjustment for Events Beyond Control

Adjustment for Events Beyond Control									
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Contribution to RCW 19.285 Compliance

Contribution to RCW 19.285 Compliance	189	184	172	235	342	205	234	13	-
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Facility Name: Lemolo 2 (Upgrade 2009)

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Lemolo 2 (Upgrade 2009)
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
 Eligible MWh Available for RCW 19.285 Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Lemolo 2 (Upgrade 2009)	1,290	1,355	1,066	1,144	1,567	1,038	1,130	1,375	
Percent of MWh Qualifying Under RCW 19.285	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA	8%	8%	8%	8%	8%	8%	8%	8%	
Eligible MWh Available for RCW 19.285 Compliance	102	109	86	95	127	84	87	109	-

Non REC Eligible Generation

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

2011 Surplus Applied to 2012
 2012 Surplus Applied to 2011
 2013 Surplus Applied to 2012
 2013 Surplus Applied to 2013
 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
 2016 Surplus Applied to 2015
 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
 Net Surplus Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
2013 Surplus Applied to 2012	-								
2013 Surplus Applied to 2013									
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				-					
2016 Surplus Applied to 2015				-					
2016 Surplus Applied to 2017					-				
2017 Surplus Applied to 2016					-				
2017 Surplus Applied to 2018						-			
2018 Surplus Applied to 2017							-		
2018 Surplus Applied to 2019								-	
2019 Surplus Applied to 2018									-
2019 Surplus Applied to 2020									
Net Surplus Adjustments	-	-	-	-	-	-	-	-	-

Adjustment for Events Beyond Control

Adjustment for Events Beyond Control									
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Contribution to RCW 19.285 Compliance

Contribution to RCW 19.285 Compliance	102	109	86	95	127	84	87	109	-
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Facility Name:

Seven Mile Hill I

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Seven Mile Hill I
Percent of MWh Qualifying Under RCW 19.285
Percent of Qualifying MWh Allocated to WA
Eligible MWh Available for RCW 19.285 Compliance

Table with 9 columns (2013-2021) and 4 rows showing MWh production, percentages, and eligible MWh available for compliance.

Non REC Eligible Generation

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

Table with 9 columns (2013-2021) and 3 rows showing quantities for non-REC eligible generation.

REC Sales / Transfers

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

Table with 9 columns (2013-2021) and 4 rows showing REC sales and transfers.

Adjustments

2011 Surplus Applied to 2012
2012 Surplus Applied to 2011
2013 Surplus Applied to 2012
2013 Surplus Applied to 2013
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
2016 Surplus Applied to 2015
2016 Surplus Applied to 2017
2017 Surplus Applied to 2016
2017 Surplus Applied to 2018
2018 Surplus Applied to 2017
2018 Surplus Applied to 2019
2019 Surplus Applied to 2018
2019 Surplus Applied to 2020
Net Surplus Adjustments

Table with 9 columns (2013-2021) and 17 rows showing surplus adjustments between years.

Adjustment for Events Beyond Control

Table with 9 columns (2013-2021) and 1 row for adjustments beyond control.

Contribution to RCW 19.285 Compliance

Table with 9 columns (2013-2021) and 1 row showing the final contribution to compliance.

Facility Name:

Nine Canyon Wind Project - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Nine Canyon Wind Project - REC Only			2,500	8,225					
Percent of MWh Qualifying Under RCW 19.285			100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA			100%	100%					
Eligible MWh Available for RCW 19.285 Compliance	-	-	2,500	8,225	-	-	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
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			2,500	2,500					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017				8,225	8,225				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
Net Surplus Adjustments	-	-	(2,500)	(5,725)	8,225	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	2,500	8,225	-	-	-	-
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Facility Name:

Dunlap I

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Dunlap I
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
 Eligible MWh Available for RCW 19.285 Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Dunlap I			339,706	388,498	351,261	391,874	182,469	375,499	432,713
Percent of MWh Qualifying Under RCW 19.285			100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA			8%	8%	8%	8%	8%	8%	8%
Eligible MWh Available for RCW 19.285 Compliance	-	-	27,359	31,741	25,412	31,135	14,000	29,712	34,239

Non REC Eligible Generation

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

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
 2016 Surplus Applied to 2015
 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
 2020 Surplus Applied to 2019
 2020 Surplus Applied to 2021
 2021 Surplus Applied to 2020
 2021 Surplus Applied to 2022

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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			27,359	27,359					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017					-				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018					24,513	24,513			
2018 Surplus Applied to 2017									
2018 Surplus Applied to 2019							-		
2019 Surplus Applied to 2018									
2019 Surplus Applied to 2020								-	
2020 Surplus Applied to 2019									
2020 Surplus Applied to 2021									-
2021 Surplus Applied to 2020								10,916	10,916
2021 Surplus Applied to 2022									
Net Surplus Adjustments	-	-	(27,359)	27,359	(24,513)	24,513	-	10,916	(10,916)

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	59,100	899	55,648	14,000	40,628	23,323
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Facility Name:

Campbell Hill/Three Buttes

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Campbell Hill/Three Buttes
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
 Eligible MWh Available for RCW 19.285 Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Campbell Hill/Three Buttes			294,027	333,872	311,597	309,188	146,872	319,183	325,985
Percent of MWh Qualifying Under RCW 19.285			100%	100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA			8%	8%	8%	8%	8%	8%	8%
Eligible MWh Available for RCW 19.285 Compliance	-	-	23,680	27,276	25,187	24,567	11,269	25,256	25,794

Non REC Eligible Generation

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

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
 2016 Surplus Applied to 2015
 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
 2020 Surplus Applied to 2019
 2020 Surplus Applied to 2021
 2021 Surplus Applied to 2020
 2021 Surplus Applied to 2022

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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			23,680	23,680					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017									
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018						25,187	25,187		
2018 Surplus Applied to 2017									
2018 Surplus Applied to 2019									
2019 Surplus Applied to 2018									
2019 Surplus Applied to 2020									
2020 Surplus Applied to 2019									
2020 Surplus Applied to 2021									
2021 Surplus Applied to 2020								20,000	20,000
2021 Surplus Applied to 2022									
Net Surplus Adjustments	-	-	(23,680)	23,680	(25,187)	25,187	-	20,000	(20,000)

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	50,956	-	49,754	11,269	45,256	5,794
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Facility Name:

Rolling Hills

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Rolling Hills
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
Eligible MWh Available for RCW 19.285 Compliance

2013	2014	2015	2016	2017	2018	2019	2020	2021
		5,468						
		100%						
		100%						
-	-	5,468	-	-	-	-	-	-

Non REC Eligible Generation

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

2013	2014	2015	2016	2017	2018	2019	2020	2021
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

2013	2014	2015	2016	2017	2018	2019	2020	2021
-	-	-	-	-	-	-	-	-

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
 2016 Surplus Applied to 2015
 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
Net Surplus Adjustments

2013	2014	2015	2016	2017	2018	2019	2020	2021
-								
-	-							
-								
		-						
		5,468	5,468					
				-	-	-	-	-
-	-	(5,468)	5,468	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

-	-	-	5,468	-	-	-		
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Facility Name: Hidden Hollow - REC Only

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Hidden Hollow - REC Only
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
Eligible MWh Available for RCW 19.285 Compliance

2013	2014	2015	2016	2017	2018	2019	2020	2021
		12,501	3,960					
		100%	100%					
		100%	100%					
-	-	12,501	3,960					

Non REC Eligible Generation

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

2013	2014	2015	2016	2017	2018	2019	2020	2021
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

2013	2014	2015	2016	2017	2018	2019	2020	2021
-	-	-	-	-	-	-	-	-

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
 2016 Surplus Applied to 2015
 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
Net Surplus Adjustments

2013	2014	2015	2016	2017	2018	2019	2020	2021
-								
-								
-	-							
	-	-						
		12,501	12,501					
			3,960	3,960				
-	-	(12,501)	8,541	3,960	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

-	-	-	12,501	3,960	-	-	-	-
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Facility Name: Fighting Creek - REC Only

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Fighting Creek - REC Only
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
Eligible MWh Available for RCW 19.285 Compliance

2013	2014	2015	2016	2017	2018	2019	2020	2021
		730						
		100%						
		100%						
-	-	730	-	-	-	-	-	-

Non REC Eligible Generation

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

2013	2014	2015	2016	2017	2018	2019	2020	2021
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

2013	2014	2015	2016	2017	2018	2019	2020	2021
-	-	-	-	-	-	-	-	-

Adjustments

2011 Surplus Applied to 2012
 2012 Surplus Applied to 2011
 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
 2016 Surplus Applied to 2015
 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
Net Surplus Adjustments

2013	2014	2015	2016	2017	2018	2019	2020	2021
-								
-	-							
-								
	-	-						
	-							
		730	730					
		-						
			-	-	-	-	-	-
-	-	(730)	730	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

-	-	-	730	-	-	-	-	-
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Facility Name:

Lower Snake – Phalen Gulch - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Lower Snake – Phalen Gulch - REC Only			1,300						
Percent of MWh Qualifying Under RCW 19.285			100%		100%	100%	200%	300%	300%
Percent of Qualifying MWh Allocated to WA			100%						
Eligible MWh Available for RCW 19.285 Compliance	-	-	1,300	-	-	-	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
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			1,300	1,300					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017				-	-	-	-	-	-
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
Net Surplus Adjustments	-	-	(1,300)	1,300	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	1,300	-	-	-	-	-
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Facility Name:

Elkhorn Valley Wind - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Elkhorn Valley Wind - REC Only			4,468						
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	-	-	4,468	-	-	-	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
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			4,468	4,468					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017					-	-			
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
Net Surplus Adjustments	-	-	(4,468)	4,468	-	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	4,468	-	-	-	-	-
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Facility Name:

Condon Wind Power Project - Condon Phase II - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Condon Wind Power Project - Condon Phase II - REC Only				7,725					
Percent of MWh Qualifying Under RCW 19.285				100%	100%	100%	200%	300%	300%
Percent of Qualifying MWh Allocated to WA				100%					
Eligible MWh Available for RCW 19.285 Compliance	-	-	-	7,725	-	-	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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 2013	-								
2014 Surplus Applied to 2015		-	-						
2015 Surplus Applied to 2014									
2015 Surplus Applied to 2016				-	-				
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017				7,725	7,725				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
Net Surplus Adjustments	-	-	-	(7,725)	7,725	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	-	7,725	-	-	-	-
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Facility Name:

Condon Wind Power Project - Condon Wind Power Project - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Condon Wind Power Project - Condon Wind Power Project - REC Only				8,286					
Percent of MWh Qualifying Under RCW 19.285				100%	100%	100%	200%	300%	300%
Percent of Qualifying MWh Allocated to WA				100%					
Eligible MWh Available for RCW 19.285 Compliance	-	-	-	8,286	-	-	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
2011 Surplus Applied to 2012									
2012 Surplus Applied to 2011									
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				-					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017				8,286	8,286				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
Net Surplus Adjustments	-	-	-	(8,286)	8,286	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	-	8,286	-	-	-	-
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Facility Name: Meadow Creek Wind Farm - Five Pine Project - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Meadow Creek Wind Farm - Five Pine Project - REC Only				29,719					
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	-	-	-	29,719	-	-	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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				-					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017					29,719	29,719			
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
Net Surplus Adjustments	-	-	-	(29,719)	29,719	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	-	29,719	-	-	-	-
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Facility Name: Klondike I - Klondike Wind Power LLC - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Klondike I - Klondike Wind Power LLC - REC Only				8,543					
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	-	-	-	8,543	-	-	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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				-					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017				8,543	8,543				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
Net Surplus Adjustments	-	-	-	(8,543)	8,543	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	-	8,543	-	-	-	-
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Facility Name: Meadow Creek Wind Farm - North Point Wind Farm - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2018	2018	2018
Total MWh Produced / Purchased from Meadow Creek Wind Farm - North Point Wind Farm - REC Only				2,644					
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	-	-	-	2,644	-	-	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2018	2018	2018
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2018	2018	2018
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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			-	-					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017				2,644	2,644				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
Net Surplus Adjustments	-	-	-	(2,644)	2,644	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	-	2,644	-	-	-	-
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Facility Name:

Nine Canyon Wind Project - Nine Canyon Phase 3 - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2018	2018	2018
Total MWh Produced / Purchased from Nine Canyon Wind Project - Nine Canyon Phase 3 - REC Only				4,668					
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	-	-	-	4,668	-	-	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2018	2018	2018
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2018	2018	2018
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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									
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017				4,668	4,668				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
Net Surplus Adjustments	-	-	-	(4,668)	4,668	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	-	4,668	-	-	-	-
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Facility Name:

Stateline (WA) - FPL Energy Vansycle LLC - REC Only

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2018	2018	2018
Total MWh Produced / Purchased from Stateline (WA) - FPL Energy Vansycle LLC - REC Only				12,946					
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	-	-	-	12,946	-	-	-	-	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2018	2018	2018
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2018	2018	2018
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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				-					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017				12,946	12,946				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
Net Surplus Adjustments	-	-	-	(12,946)	12,946	-	-	-	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	-	12,946	-	-	-	-
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Facility Name: Bear Creek Solar

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Bear Creek Solar						5,710	22,676	19,883	-
Percent of MWh Qualifying Under RCW 19.285						100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA						22%	22%	22%	
Eligible MWh Available for RCW 19.285 Compliance	-	-	-	-	-	677	5,042	4,455	-

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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					-				
2016 Surplus Applied to 2015						-			
2016 Surplus Applied to 2017							-		
2017 Surplus Applied to 2016								-	
2017 Surplus Applied to 2018									-
2018 Surplus Applied to 2017									
2018 Surplus Applied to 2019							677		
2019 Surplus Applied to 2018								677	
2019 Surplus Applied to 2020								141	
2020 Surplus Applied to 2019									141
2020 Surplus Applied to 2021									4,455
2021 Surplus Applied to 2020									
2021 Surplus Applied to 2022									
Net Surplus Adjustments						(677)	4,991	(4,314)	-

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	-	-	-	10,033	141	-
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Facility Name: Bly Solar

MWh Allocated to WA Compliance

Total MWh Produced / Purchased from Bly Solar
 Percent of MWh Qualifying Under RCW 19.285
 Percent of Qualifying MWh Allocated to WA
Eligible MWh Available for RCW 19.285 Compliance

2013	2014	2015	2016	2017	2018	2019	2020	2021
				-	587	18,041	19,125	
					100%	100%	100%	100%
					22%	22%	22%	
-	-	-	-	-	129	4,012	4,285	-

Non REC Eligible Generation

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

2013	2014	2015	2016	2017	2018	2019	2020	2021
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-

REC Sales / Transfers

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

2013	2014	2015	2016	2017	2018	2019	2020	2021
-	-	-	-	-	-	-	-	-

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
 2016 Surplus Applied to 2015
 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
 2020 Surplus Applied to 2019
 2020 Surplus Applied to 2021
 2021 Surplus Applied to 2020
 2021 Surplus Applied to 2022

2013	2014	2015	2016	2017	2018	2019	2020	2021
-								
-	-							
-	-							
	-	-	-					
		-	-					
			-	-				
				-	-			
					-			
						-		
							129	
							129	
								119
							119	
							4,285	4,285
								-
								-
								-
								-
				-	(129)	4,295	(4,166)	-

Net Surplus Adjustments

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

-	-	-	-	-	-	8,307	119	-
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Facility Name:

Enterprise Solar

MWh Allocated to WA Compliance

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Total MWh Produced / Purchased from Enterprise Solar				84,577	224,267	225,336	220,052	213,195	211,734
Percent of MWh Qualifying Under RCW 19.285				100%	100%	100%	100%	100%	100%
Percent of Qualifying MWh Allocated to WA				23%	22%	22%	22%	22%	22%
Eligible MWh Available for RCW 19.285 Compliance	-	-	-	19,234	50,456	49,593	48,932	47,766	47,130

Non REC Eligible Generation

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Extra Apprenticeship Credit	-	-	-	-	-	-	-	-	-
Distributed Generation Bonus	-	-	-	-	-	-	-	-	-
Total Quantity from Non REC Eligible Generation	-	-	-	-	-	-	-	-	-

REC Sales / Transfers

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

Adjustments

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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			-	-					
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017				19,234	19,234				
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018					50,456	50,456			
2018 Surplus Applied to 2017									
2018 Surplus Applied to 2019						35,344	35,344		
2019 Surplus Applied to 2018									
2019 Surplus Applied to 2020									
2020 Surplus Applied to 2019							47,766	47,766	
2020 Surplus Applied to 2021									-
2021 Surplus Applied to 2020								20,000	20,000
2021 Surplus Applied to 2022									
Net Surplus Adjustments	-	-	-	(19,234)	(31,222)	15,112	83,110	(27,766)	(20,000)

Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

	-	-	-	-	19,234	64,705	132,042	20,000	27,130
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REC Sales / Transfers

Quantity of RECs Sold
 Bonus Incentives Transferred
 Bonus Incentives Not Realized

Total Sold / Transferred / Unrealized

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Quantity of RECs Sold									
Bonus Incentives Transferred									
Bonus Incentives Not Realized									
Total Sold / Transferred / Unrealized	-	-	-	-	-	-	-	-	-

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
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 2016 Surplus Applied to 2017
 2017 Surplus Applied to 2016
 2017 Surplus Applied to 2018
 2018 Surplus Applied to 2017
 2018 Surplus Applied to 2019
 2019 Surplus Applied to 2018
 2019 Surplus Applied to 2020
 2020 Surplus Applied to 2019
 2020 Surplus Applied to 2021
 2021 Surplus Applied to 2020
 2021 Surplus Applied to 2022

	2013	2014	2015	2016	2017	2018	2019	2020	2021
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									
2016 Surplus Applied to 2015									
2016 Surplus Applied to 2017									
2017 Surplus Applied to 2016									
2017 Surplus Applied to 2018									
2018 Surplus Applied to 2017									
2018 Surplus Applied to 2019									
2019 Surplus Applied to 2018									
2019 Surplus Applied to 2020									
2020 Surplus Applied to 2019									
2020 Surplus Applied to 2021									
2021 Surplus Applied to 2020									
2021 Surplus Applied to 2022									

Net Surplus Adjustments

-	-	-	-	-	-	-	-	-	-
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Adjustment for Events Beyond Control

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Contribution to RCW 19.285 Compliance

-	-	-	-	-	-	-	-	75,000	-
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Attachment B

Attachment B

Description of Hydroelectric Efficiency Analysis

The incremental hydro generation resulting from efficiency gains from hydropower upgrades were calculated using the same method that PacifiCorp submitted to the Oregon Department of Energy for certification of PacifiCorp's facilities as eligible for the Oregon Renewable Portfolio Standard program.

Historical hourly generation data for the period 2007 through 2012 was collected for each unit that was upgraded. Each hour of generation was modified to create two additional hourly profiles representing the efficiency of the unit before and after the upgrade. The hourly pre- and post- efficiency values were based on curves developed from the unit index tests or manufacturer-provided theoretical curves. Efficiency gain for each hour was calculated by taking the difference between the new and old efficiency value and dividing it by the old efficiency value. This gain was then multiplied by the post upgrade generation value to produce an incremental megawatt-hour gain. The initial calculated incremental gain was subtracted from the pre/post upgraded generation profiles to exclude the generation associated with the upgrade.

Generation improvements were calculated for every instance when efficiency improvements were positive including those periods when the unit was ramping up to maximum efficiency. In some cases, portions of the post efficiency upgrade curve are less than the pre upgrade curve. In instances that the efficiency gain was negative, generation was not included in the calculation. Further, since in some cases the post upgrade curve extended beyond the pre upgrade curve (i.e. the new turbine had a higher generation capacity) generation improvements were capped at the point when flows on the pre and post upgrade curve were equal.



Oregon

Kate Brown, Governor

Department of Energy

625 Marion St NE

Salem, OR 97301-3742

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www.oregon.gov/energy

December 29, 2015

Pooja Kishore
PacifiCorp
825 NE Multnomah St.
Portland, OR 97232



RE: Updated Certification for Efficiency Upgrades at Eleven Hydropower Generating Units

Dear Ms. Kishore:

The Oregon Department of Energy approved Pacific Power's request for an updated incremental hydropower efficiency percentage in April 2014 for the following eleven generating units. As part of the update, Pacific Power provided the department with hourly generation data for the time period 2007 through 2012. The Department is updating the Eligible Thru date for these facilities to reflect Oregon Administrative Rules adopted by the Department in 2014.

Generating Unit	WREGIS Number	Approval Number	Incremental Percentage	Eligible Thru Date
Prospect 2	W140	12alt002or	1.68%	January 2021
Yale 1 & 2	W141	12alt003wa	1.35%	January 2021
Copco 1	W142	12alt004ca	0.52%	January 2021
Cutler	W151	12alt005ut	3.10%	January 2021
Lemolo 1	W157	12alt006or	10.16%	January 2021
Lemolo 2	W158	12alt007or	0.78%	January 2021
Oneida	W160	12alt008id	7.87%	January 2021
Pioneer	W162	12alt009ut	6.74%	January 2021
Prospect 3	W164	12alt010or	10.71%	January 2021
Big Fork	W179	12alt011mt	4.22%	January 2021
JC Boyle	W180	12alt012or	1.33%	January 2021

If any changes are made to these facility that could affect their eligibility for the Oregon RPS, the Department must be notified.

Please contact me with any questions about this letter or approval.

Best,

Julie Peacock
WREGIS Program Administrator-Oregon
Oregon Department of Energy
503.373.2125
Julie.peacock@state.or.us



REDACTED

Attachment C

One Time Calculation of Incremental Cost for Each (All) Eligible Resource(s)

480-109-210(2)(a)(i) Utility must make a one-time calculation of incremental cost for each eligible resource at the time of acquisition or, for historic acquisitions, the best information available at the time of acquisition

Formula **One Time Calculation** of Incremental Cost:

Energy-Levelized Incremental Cost:
 [Levelized Cost Eligible Renewable Resource – Levelized Cost Alternative]

Capacity-Levelized Incremental Cost:
 [Levelized Cost Eligible Renewable Resource – Levelized Cost Alternative]

Energy + Capacity = Incremental Cost

Resource	Incremental Levelized Cost (\$/REC/MWh)	Levelized Cost Eligible Renewable Resource (\$/MWh)	Total Annual Cost (\$)	Energy Levelized Cost	Capacity Levelized Cost	Capacity Total Alternative Cost (\$)	Incremental Cost (\$)	Washington Share (\$)
Goodnoe Hills ¹	14.13	89.86	23,998,180	66.28	9.44	20,223,968	3,774,212	-
Goodnoe Hills - Repowered ²	17.09	74.51	20,279,851	45.94	11.49	15,628,690	4,651,161	-
Leaning Juniper ¹	3.58	76.91	23,505,014	64.26	9.06	22,409,681	1,095,332	-
Leaning Juniper - Repowered ²	18.29	77.53	21,752,206	49.28	11.71	17,110,705	4,641,501	-
Marengo I ³	6.47	81.28	31,977,638	65.53	9.28	29,431,936	2,545,702	-
Marengo II ³	12.11	87.89	16,471,142	66.28	9.50	14,202,225	2,268,916	-
Lemolo 1 (Upgrade 2003)	(45.23)	3.91	51,351	37.76	11.37	645,674	(594,322)	-
Lemolo 2 (Upgrade 2009)	(65.95)	51.55	886,739	92.87	24.62	2,021,147	(1,134,408)	-
JC Boyle (Upgrade 2005)	(66.44)	3.26	113,445	39.00	28.09	2,336,870	(2,223,425)	-
Prospect 2 (Upgrade 1999)	(40.27)	4.31	39,062	34.93	10.47	411,164	(372,102)	-
Top of the World ¹	7.50							
Top of the World - WCA Repowered weighted average ²	12.99							
Dunlap I ¹	7.50							
Dunlap I - WCA Repowered weighted average ²	12.99							
Seven Mile Hill I ¹	7.50							
Seven Mile Hill I - WCA Repowered weighted average ²	12.99							
Glenrock I ¹	7.50							
Glenrock I - WCA Repowered weighted average ²	12.99							
Campbell Hill ¹	7.50							
Campbell Hill - WCA Repowered weighted average ²	12.99							
Bennett Creek	1.25-1.50 (varies by vintage)							
Hot Springs	1.25-1.50 (varies by vintage)							
Pavant I								
Enterprise								
Adams Solar								
Bear Creek Solar								
Bly Solar								
Elbe Solar								
Granite Mountain East ⁴								
Granite Mountain West ⁴								
Total Renewable Resource Cost			139,074,627			124,422,060	14,652,567	-

Note: Washington's share of the resource varies from year to year, depending on the state's actual System Generation (SG) Allocation factor.

¹ Incremental cost for pre-repowered resources applied to 2019 RPS resources, (see (2)(a)(i) Annual-2019, actual tab)

² Incremental cost for post-repowered resources applied to 2020 RPS resources, (see (2)(a)(ii) Annual-2020, estimate tab)

³ Incremental cost applied to 2019 and 2020 RPS resources

⁴ New resources for 2020 compliance; REC purchase executed November 6, 2019; Projects were operational 9/21/16 and 9/30/16, respectively.

Facilities located in Salt Lake County, Utah - a state in which PacifiCorp serves retail electrical customers.

PacifiCorp also purchases the energy for these facilities under a long-term (> 12 months) Qualifying Facility (QF) power purchase agreement. (WAC 480-109-060 (12)(e))

Washington Share:	
2020 ALL RESOURCES	
TOTAL INCREMENTAL COST	
= ENERGY +	
CAPACITY	-

2019 Actual Data: Annual Calculation of Revenue Requirement Ratio

480-109-210(2)(a)(ii) Utility must annually calculate its revenue requirement ratio for 1) All Resources 2) Required Resources Target Year

Formula **Annual Calculation** of Incremental Cost (Revenue Requirement Ratio):

1) Total Incremental Cost All* Resources:

$\{[\text{sum of incremental costs of All* eligible resources} + \text{cost of unbundled RECs}] - [\text{revenue RECs}]\} / \text{annual revenue requirement}$

2) Total Incremental Cost Required Resources for Target Year:

$\{[\text{sum of incremental costs of Target Year* eligible resources used for target year compliance} + \text{cost of unbundled RECs}] - [\text{revenue RECs}]\} / \text{annual revenue requirement}$

Resource	TARGET YEAR: ALL AVAILABLE RESOURCES BASED ON ACTUAL RESULTS			TARGET YEAR: FORECAST SUBJECT TO CHANGE		
	sum of incremental costs of all eligible resources	RECs Generated or Purchased	Revenue from REC sales	sum of incremental costs of all eligible	RECs purchased	Revenue from REC sales
Goodnoe Hills	62,476	4,421	0			
Leaning Juniper	45,971	12,827	0			
Marengo I	116,895	18,066	0			
Marengo II	84,866	7,010	0			
Lemolo 1 (Upgrade 2003)	(40,390)	893	0			
Lemolo 2 (Upgrade 2009)	(5,737)	87	0			
JC Boyle (Upgrade 2005)	(15,546)	234	0			
Prospect 2 (Upgrade 1999)	(9,867)	245	0			
Top of the World	151,804	20,250	0			
Dunlap I	104,951	14,000	0			
Seven Mile Hill I	101,203	13,500	0			
Glenrock I	82,461	11,000	0			
Campbell Hill	84,478	11,269	0			
Bennett Creek Windfarm - REC Only	4,824	3,216	0			
Hot Springs Wind Farm - REC Only	2,885	1,923	0			
Adams Solar		9,672	0			
Bear Creek Solar		10,033	0			
Bly Solar		8,307	0			
Elbe Solar		9,587	0			
Pavant		79,087	0			
Enterprise		132,042	0			
			0			
Total	1,193,422	367,669	0			
WA Share	1,193,422	367,669	0			

Annual Revenue Requirement (most recent rate case)	330,209,153	
CALCULATION 1 :	1,193,422	CALCULATION 2:
	0.36%	

2019 Estimated Data: Annual Calculation of Revenue Requirement Ratio

480-109-210(2)(a)(ii) Utility must annually calculate its revenue requirement ratio for 1) All Resources 2) Required Resources Target Year

Formula **Annual Calculation** of Incremental Cost (Revenue Requirement Ratio):

1) Total Incremental Cost All* Resources:

{[sum of incremental costs of All* eligible resources + cost of unbundled RECs] - [revenue RECs]} / annual revenue requirement

2) Total Incremental Cost Required Resources for Target Year:

{[sum of incremental costs of Target Year* eligible resources used for target year compliance + cost of unbundled RECs] - [revenue RECs]} / annual revenue requirement

Resource	ALL AVAILABLE RESOURCES ESTIMATED			TARGET YEAR: BASED ON EXPECTED COMPLIANCE RESOURCES		
	sum of incremental costs of all eligible resources	RECs Generated or Purchased	Revenue from REC sales	sum of incremental costs of all eligible resources	RECs Generated or Purchased	Revenue from REC sales
Goodnoe Hills - Repowered	714,958	41,836	0	714,958	41,836	0
Leaning Juniper - Repowered	876,338	47,926	0	876,338	47,926	0
Marengo I	437,830	67,666	0	437,830	67,666	0
Marengo II	410,710	33,925	0	410,710	33,925	0
Lemolo 1 (Upgrade 2003)	(53,191)	1,176	0	(53,191)	1,176	0
Lemolo 2 (Upgrade 2009)	(7,188)	109	0	(7,188)	109	0
JC Boyle (Upgrade 2005)	(864)	13	0	(864)	13	0
Prospect 2 (Upgrade 1999)	(11,438)	284	0	(11,438)	284	0
Top of the World - WCA Repowered weighted average	906,876	69,810	0	906,876	69,810	0
Dunlap I - WCA Repowered weighted average	527,783	40,628	0	527,783	40,628	0
Seven Mile Hill I - WCA Repowered weighted average	398,903	30,707	0	398,903	30,707	0
Glenrock I - WCA Repowered weighted average	612,924	47,182	0	612,924	47,182	0
Campbell Hill - WCA Repowered weighted average	587,904	45,256	0	587,904	45,256	0
Granite Mountain East	0	75,000	0	0	75,000	0
Granite Mountain West	0	75,000	0	0	75,000	0
Adams Solar		125	0		125	0
Bear Creek Solar		141	0		141	0
Bly Solar		119	0		119	0
Elbe Solar		125	0		125	0
Pavant		10,000	0		10,000	0
Enterprise		20,000	0		20,000	0
Total	5,710,261	607,028	0	5,710,261	607,028	0
WA Share	5,710,261	607,028		5,710,261	607,028	

Annual Revenue Requirement (most recent rate case)	330,209,153	330,209,153	
CALCULATION 1:	5,710,261	CALCULATION 2:	
	1.729%		1.729%

(iii)(A) & (B) Annual Reporting Summary Data: 2019 and 2020

2019

Utility must (A) report its total incremental cost as a dollar amount and in dollars per megawatt-hour of renewable energy generated by all eligible renewable resources in the calculation (a)(i) of this subsection; and (B) multiply the dollars per megawatt-hour cost calculated in (a)(iii)(A) of this subsection by the number of megawatt-hours needed for target year compliance.

Resource	(A)			(B)	
	Total Incremental Cost (as dollar \$ amt.)	MWh	Total Incremental Cost (\$/MWh)	Number of Megawatt-hours Needed for Target Year Compliance	Total Incremental Cost (\$/MWh) Multiplied by Number of Megawatt-hours Needed for Target Year Compliance
Goodnoe Hills	62,476	4,421	14.13	4,421	62,476
Leaning Juniper	45,971	12,827	3.58	12,827	45,971
Marengo I	116,895	18,066	6.47	18,066	116,895
Marengo II	84,866	7,010	12.11	7,010	84,866
Lemolo 1 (Upgrade 2003)	(40,390)	893	(45.23)	893	(40,390)
Lemolo 2 (Upgrade 2009)	(5,737)	87	(65.95)	87	(5,737)
JC Boyle (Upgrade 2005)	(15,546)	234	(66.44)	234	(15,546)
Prospect 2 (Upgrade 1999)	(9,867)	245	(40.27)	245	(9,867)
Top of the World	151,804	20,250	7.50	20,250	151,804
Dunlap I	104,951	14,000	7.50	14,000	104,951
Seven Mile Hill I	101,203	13,500	7.50	13,500	101,203
Glenrock I	82,461	11,000	7.50	11,000	82,461
Campbell Hill	84,478	11,269	7.50	11,269	84,478
Bennett Creek Windfarm - Bennett Creek Windfarm *	4,824	3,216	1.50	3,216	4,824
Hot Springs Windfarm - Hot Springs Windfarm *	2,885	1,923	1.50	1,923	2,885
Adams Solar *		9,672		9,672	
Bear Creek Solar *		10,033		10,033	
Bly Solar *		8,307		8,307	
Elbe Solar *		9,587		9,587	
Pavant Solar *		79,087		79,087	
Enterprise Solar *		132,042		132,042	
TOTAL	1,193,422	367,669		367,669	1,193,422

*includes 2018 vintage RECs carried forward for 2019 compliance

2020

Utility must (A) report its total incremental cost as a dollar amount and in dollars per megawatt-hour of renewable energy generated by all eligible renewable resources in the calculation (a)(i) of this subsection; and (B) multiply the dollars per megawatt-hour cost calculated in (a)(iii)(A) of this subsection by the number of megawatt-hours needed for target year compliance.

Resource	(A)			(B)	
	Total Incremental Cost (as dollar \$ amt.)	MWh	Total Incremental Cost (\$/MWh)	Number of Megawatt-hours Needed for Target Year Compliance	Total Incremental Cost (\$/MWh) Multiplied by Number of Megawatt-hours Needed for Target Year Compliance
Goodnoe Hills - Repowered	714,958	41,836	17.09	41,836	714,958
Leaning Juniper - Repowered	876,338	47,926	18.29	47,926	876,338
Marengo I	437,830	67,666	6.47	67,666	437,830
Marengo II	410,710	33,925	12.11	33,925	410,710
Lemolo 1 (Upgrade 2003)	(53,191)	1,176	(45.23)	1,176	(53,191)
Lemolo 2 (Upgrade 2009)	(7,188)	109	(65.95)	109	(7,188)
JC Boyle (Upgrade 2005)	(864)	13	(66.44)	13	(864)
Prospect 2 (Upgrade 1999)	(11,438)	284	(40.27)	284	(11,438)
Top of the World - WCA Repowered weighted average	906,876	69,810	12.99	69,810	906,876
Dunlap I - WCA Repowered weighted average	527,783	40,628	12.99	40,628	527,783
Seven Mile Hill I - WCA Repowered weighted average	398,903	30,707	12.99	30,707	398,903
Glenrock I - WCA Repowered weighted average	612,924	47,182	12.99	47,182	612,924
Campbell Hill - WCA Repowered weighted average	587,904	45,256	12.99	45,256	587,904
Granite Mountain East		75,000		75,000	
Granite Mountain West		75,000		75,000	
Adams Solar		125		125	
Bear Creek Solar		141		141	
Bly Solar		119		119	
Elbe Solar		125		125	
Pavant Solar		10,000		10,000	
Enterprise Solar		20,000		20,000	
TOTAL	5,710,261	607,028		607,028	5,710,261