



**BLUE PLANET
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November 29, 2016

Commission Chair Lisa Hardie
Commissioner John Savage
Commissioner Stephen Bloom
Public Utility Commission of Oregon
PO Box 1088
Salem OR 97308-1088

RE: Northwest and Intermountain Power Producers Coalition Comments on Pacific Power's Advice No. 16-012/ Docket ADV 386, Changes to Renewable Energy Rider Optional Bulk Purchase Option.

Dear Commissioners:

I write on behalf of the Northwest and Intermountain Power Producers Coalition (“NIPPC”)¹ to provide comments on Pacific Power’s (“PPC”) Advice No. 16-012, in which PPC proposes changes to its Schedule 272, Renewable Energy Rider Optional Bulk Purchase Option. NIPPC believes that the proposed changes are unnecessary and inappropriate, and should be rejected, as further detailed below. If PPC’s proposed tariff change is not rejected outright, NIPPC requests that this matter be set for hearing to allow further exploration of the issues raised.

Pacific Power’s Schedule 272, Renewable Energy Rider Optional Bulk Purchase Option, is part of PacifiCorp’s “Blue Sky” program. NIPPC understands that this program was created because of commitments made by the company as part of its acquisition by Scottish Power, with additional commitments when it was acquired by its current parent company.² PacifiCorp historically has maintained nearly identical Renewable Energy Rider Optional Bulk Purchase Options in each state in which it operates. Examples of PacifiCorp’s current tariff provisions for this service in other states are included in Attachment 1. In these other states, PacifiCorp’s tariff clearly specifies that the charge from the Renewable Energy Rider Optional Bulk Purchase Option is “is in addition to all other charges contained in Customer’s applicable tariff schedule” and lists limited, specific sources of qualifying renewable energy.

¹ NIPPC is a trade association whose members include independent power producers and electricity service providers active in the Pacific Northwest and Western energy markets. The purpose of NIPPC is to represent the interests of its members in developing rules and policies that help achieve a competitive electric power supply market in the Pacific Northwest, including rules affecting the procurement and sale of renewable energy. A current list of NIPPC members can be found at <http://nippc.org/about/members/>.

² For a partial program history, see Public Service Commission of Utah, Docket No. 07-0350T13, *In the Matter of the Advice No. 07-13, Rocky Mountain Power’s Proposed Revisions to Schedules 70, Renewable Energy Rider - Optional and 72, Renewable Energy Rider - Optional Bulk Purchase Option*, September 06, 2007.

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As set out in greater detail below, the Commission recently completed a two-year process under Docket UM 1690 to consider whether utilities in Oregon should be allowed to offer a voluntary renewable energy tariff. The Commission determined that it would consider allowing the utilities to do so, subject to a number of express conditions. Faced with these conditions, Pacific Power refused to offer a VRET alternative, stating that:

“Based on the Company's discussions and research, Pacific Power is not able to develop a tariff-based program that meets the needs of customers while conforming to the narrow constraints of the VRET guidelines established by the Commission.”

April 16, 2016 Letter filing, Pacific Power, Docket UM 1690 (included as Attachment 2).

Now, just a few months after close of the Docket UM 1690 proceeding, Pacific Power is proposing modifications to its Schedule 272 – “Renewable Energy Rider Bulk Purchase Option” that would appear to allow Pacific Power to enter into individually negotiated arrangements to sell renewable energy to interested customers, with no protection against cost-shifting to other customers, no requirement that terms mirror direct access,³ no requirement that the offering be restricted to bundled REC products, or any of the other protections the Commission required in Docket UM 1690. In fact, Pacific Power goes so far as to eliminate the specified sources of power considered renewable, proposing now that renewable power simply be “any bundled power or Renewable Energy Credits (RECS) purchased by the company ...” ostensibly including power generated from coal. Further, Pacific Power proposes to eliminate the limitation that “Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the renewable energy is not eligible.”

PacifiCorp’s filing in this docket to modify just its Oregon program appears to be a direct end-run around the Commission’s explicit requirements outlined in Docket UM 1690, and should not be countenanced. PacifiCorp’s proposal to eliminate the definition of sources of renewable power eligible for the program, allowing for the sale of both non-renewable, carbon-intensive power generation and generation for which it is already under a statutory requirement to provide to fall under the umbrella of its “Blue Sky” program is clearly inappropriate.

Section 860-22-0025 of the Commission’s regulations require that a utility proposing to change its tariff provide a statement plainly indicating the changes made and a detailed statement

³ See Order No. 15 205, Docket UM 1690, Condition 6: “VRET terms and conditions (including the timing and frequency of VRET offerings), as well as transition costs, must mirror those for direct access. PGE and PacifiCorp may propose VRET terms and conditions that differ from current direct access provisions but must proposed changes to their respective direct access programs to match those changes”).

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setting forth the reasons in support of its proposed change. Pacific Power's advice filing in this docket does neither, and should be rejected outright by the Commission.

Should the Commission not reject Pacific Power's filing outright, the this matter should be set for hearing, to allow interested parties to fully develop the issues raised.

_____/S/_____
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One of counsel for Northwest and Intermountain Power Producers Coalition.

ATTACHMENT 1

PACIFICORP RENEWABLE ENERGY RIDER OPTIONAL BULK PURCHASE OPTION

OTHER STATES

Schedule No. RO-3

RENEWABLE ENERGY
RIDER - OPTIONAL BULK PURCHASE OPTION

APPLICABILITY:

Applicable to all non-residential Customers taking service under the Company's rate Schedules.

TERRITORY:

Within the entire territory served in California by the Utility.

ADMINISTRATION:

Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases to Block purchases may be used to fund Qualifying Initiatives as defined below.

BLOCK:

1 Block equals 100 kWh of Renewable Energy. This program requires a minimum purchase of 121.2 megawatt-hours (121,200 kWh or 1,212 blocks) per year. For the purpose of qualifying for this Schedule, Customers with multiple sites can sum their Block purchases across all Pacific Power & Light Company and Rocky Mountain Power service territories to meet the minimum purchase requirement.

CHARGE PER BLOCK:

\$0.70 per month (\$7.00 per MWh per month) **Plus**
\$1,500.00 per year fixed charge

CHARGE:

The Charge can be billed either monthly, twice yearly or annually and shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block, plus the \$1,500 yearly fixed charge divided between the customer's billing choice (monthly, twice yearly or annually) and added to the Customer's standard bill. The Charge is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Charge shall be applied to the Customer's billing regardless of actual energy consumption.

RENEWABLE ENERGY:

Renewable Energy includes bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;
- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;
- pipeline or irrigation canal hydroelectric systems;
- wave or tidal action; and
- low emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservations such as creosote, pentachlorophenol or copper chrome arsenic.

(Continued)

Issued by

Advice Letter No. 478-E William R. Griffith Date Filed September 28, 2012

Name

Decision No. _____ VP, Regulation Effective October 28, 2012

Title

Schedule No. RO-3

RENEWABLE ENERGY
RIDER - OPTIONAL BULK PURCHASE OPTION

RENEWABLE ENERGY: (continued)

Renewable Energy Credits (also known as Tradable Renewable Energy Credits, Renewable Energy Certificates, Green Tags or Carbon Credits) represent all of the regional and global environmental and emissions benefits associated with one unit of output from a qualifying renewable electricity generating resource. In some markets, the credits are certified by an independent third party and include a serial number for tracking purposes.

Offering must consist of 100% new Renewable Energy.

New Renewable Energy is (1) placed in operation (generating electricity) on or after January 28, 2000; (2) repowered on or after January 28, 2000 such that 80% of the fair market value of the project derives from new generation equipment installed as part of the repowering, or (3) a separable improvement to or enhancement of an operating existing facility that was first placed in operation prior to January 28, 2000, such that the proposed incremental generation is contractually available for sale and metered separately than existing generation at the facility. Any enhancement of a fuel source that increases generation at an existing facility, without the construction of a new or repowered, separately metered generating unit, is not eligible to participate.

Preference will be given to resources within Pacific Power & Light Company and Rocky Mountain Power service territories.

Renewable Energy purchases made to match Customer Block purchases are in addition to investments associated with the Company's Integrated Resource Plan, and are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in responses to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

QUALIFYING INITIATIVES:

1. Funding for locally-owned commercial-scale Renewable Energy projects that produce less than 10 MW of electricity. The preference is for local community based projects that provide strong environmental and economic benefit to local communities and Customers the Company services under this Schedule.
2. Funding for research and development projects encouraging Renewable Energy market transformation in order to accelerate marketability of Renewable Energy technologies.
3. Investment in the above-market costs associated with the construction of Renewable Energy facilities or purchase by contract of Renewable Energy, reducing the costs of Renewable Energy to be competitive with cost-effective resources.

(Continued)

Issued by

Advice Letter No.	<u>341-E</u>	<u>Andrea L. Kelly</u>	Date Filed	<u>March 30, 2007</u>
		Name		
Decision No.	<u> </u>	<u>VP, Regulation</u>	Effective	<u>May 1, 2007</u>
		Title		

Schedule No. RO-3

RENEWABLE ENERGY
RIDER - OPTIONAL BULK PURCHASE OPTION

QUALIFYING INITIATIVES: (continued)

- 4. To the extent a project in paragraphs 1, 2, and 3 above is able to generate RECs, the recipient agrees that the Company has the right to claim a share of the project's REC output. The share amount is expressed as a percentage of output when comparing the Company's financial contribution to the overall cost of the project. The share amount of these RECs will be retired on behalf of program participants across the Company's service territories. The Company will also be given the opportunity to purchase additional RECs off the project.
- 5. Qualifying Initiatives are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

SPECIAL CONDITIONS:

- 1. Customers may apply for this Schedule anytime during the year.
- 2. The Company may accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected within the last 12 months.
- 3. The Company will buy Renewable Energy within two years of a Customer's purchase.
- 4. To ensure that all costs and benefits of this program are isolated to the participants of this program, all funds collected under this program will be separately identified and tracked. On the effective date of this Schedule, the Company will establish a regulatory liability balancing account for all funds collected and will debit the regulatory liability as funds are spent. The Company will endeavor to match spending to collection within each calendar year.

RULES AND REGULATIONS:

Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Rules and Regulations of the Company on file with and approved by the Public Utilities Commission of the State of California, including future applicable amendments, will be considered as forming a part of and incorporated in said agreement.

Issued by

Advice Letter No.	<u>379-E</u>	<u>Andrea L. Kelly</u>	Date Filed	<u>March 18, 2009</u>
		Name		
Decision No.	<u> </u>	<u>VP, Regulation</u>	Effective	<u>April 17, 2009</u>
		Title		

ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 72

STATE OF UTAH

Renewable Energy Rider - Optional

Bulk Purchase Option

PURPOSE: This Schedule is a voluntary program for Customers interested in supporting the purchase and development of Renewable Energy, as defined below. It gives Customers the opportunity to demonstrate their personal commitment by purchasing blocks of Renewable Energy to encourage further development of Renewable Energy resources in the Western region. Renewable Energy purchases under this Schedule are in addition to investments associated with the Company's Integrated Resource Plan. Rocky Mountain Power does not make a profit from this program, and all revenues and costs associated with this program stay with the program and do not go to the utility.

AVAILABILITY: At any point on the Company's interconnected system.

APPLICATION: To Customers receiving service under the Company's non-residential Electric Service Schedules.

ADMINISTRATION: Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases to Block purchases may be used to fund Qualifying Initiatives as defined below.

BLOCK: 1 Block equals 100 kWh of Renewable Energy. This program requires a minimum purchase of 121.2 megawatt-hours (121,200 kWh or 1,212 Blocks) per year. For the purpose of qualifying for this Schedule, Customers with multiple sites can sum their Block purchases across all Pacific Power & Light Company and Rocky Mountain Power service territories to meet the minimum purchase requirement.

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ELECTRIC SERVICE SCHEDULE NO. 72 - Continued

CHARGE PER BLOCK: \$0.70 per month (\$7.00 per MWh per month)
Plus \$1,500.00 per year fixed charge

For purchase commitments over two years in length or large purchase over 75,000 MWh per year, individually negotiated arrangements may be available, pursuant to the execution of a written contract.

CHARGE: The Charge can be billed either monthly, twice yearly or annually and shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block, plus the \$1,500 yearly fixed charge divided between the customer's billing choice (monthly, twice yearly or annually) and added to the Customer's standard bill. The Charge is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Charge shall be applied to the Customer's billing regardless of actual energy consumption.

RENEWABLE ENERGY: Renewable Energy includes the premium associated with bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;
- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;
- Pipeline or irrigation canal hydroelectric systems;
- wave or tidal action; and
- low emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservations such as creosote, pentachlorophenol or copper chrome arsenic.

Each Renewable Energy Credit (also known as Tradable Renewable Energy Credit, Renewable Energy Certificate, Green Tag or Carbon Credit) represents all of the regional and global environmental and emissions benefits associated with one unit of output from the qualifying renewable electricity generating resource. In some markets, the credits are certified by an independent third party and include a serial number for tracking purposes.

Offering must consist of 100% new Renewable Energy.
(continued)

ELECTRIC SERVICE SCHEDULE NO. 72 - Continued

RENEWABLE ENERGY (Continued)

New Renewable Energy is (1) placed in operation (generating electricity) on or after January 28, 2000; (2) repowered on or after January 28, 2000 such that 80% of the fair market value of the project derives from new generation equipment installed as part of the repowering, or (3) a separable improvement to or enhancement of an operating existing facility that was first placed in operation prior to January 28, 2000, such that the proposed incremental generation is contractually available for sale and metered separately than existing generation at the facility. Any enhancement of a fuel source that increases generation at an existing facility, without the construction of a new or repowered, separately metered generating unit, is not eligible to participate.

Preference will be given to resources within Pacific Power & Light Company and Rocky Mountain Power service territories.

Renewable Energy purchases made to match Customer Block purchases are in addition to investments associated with the Company's Integrated Resource Plan, and are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

QUALIFYING INITIATIVES

1. Funding for locally-owned commercial-scale Renewable Energy projects that produce less than 10 MW of electricity. The preference is for local community based projects that provide strong environmental and economic benefit to local communities and Customers the Company services under this Schedule.
2. Funding for research and development projects encouraging Renewable Energy in order to accelerate marketability of Renewable Energy technologies.
3. Investment in the above market costs associated with the construction of Renewable Energy facilities or purchase by contract of Renewable Energy, reducing the costs of Renewable Energy to be competitive with cost-effective resources.
4. To the extent a project in paragraphs 1, 2, and 3 above is able to generate RECs, the recipient agrees that the Company has the right to claim a share of the project's REC output. The share amount is expressed as a percentage of output when comparing the Company's financial contribution to the overall cost of the project. The share amount of these RECs will be retired on behalf of program participants across the

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ELECTRIC SERVICE SCHEDULE NO. 72 – Continued

QUALIFYING INITIATIVES (continued)

Company's service territories. The Company will also be given the opportunity to purchase additional RECs off the project.

5. Qualifying Initiatives are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

SPECIAL CONDITIONS

1. Customers may apply for or terminate from this Schedule anytime during the year.
2. The Company may not accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected within the last 12 months.
3. The Company will purchase Renewable Energy within two years of a Customer's purchase.
4. To ensure that all costs and Renewable Energy purchases of this program are isolated to the participants of this program, all funds collected under this program will be separately identified and tracked. On the effective date of this Schedule, the Company will establish a regulatory liability for all funds collected and will debit the regulatory liability as funds are spent. The company will apply the interest rate identified in Electric Service Schedule No. 300, Sheet No. 9R4 to the balances in the regulatory liability account. The Company will endeavor to match spending to collection within each calendar year.
5. Beginning February 1, 2008, all RECs purchased under the program must conform with Green-e Energy national standards and be Green-e certified or Green-e certifiable. Beginning January 1, 2009, all RECs purchased are expected to be registered with the Western Renewable Energy Generation Information System (WREGIS) or as otherwise approved by the Public Service Commission of Utah given market availability.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

PACIFIC POWER & LIGHT COMPANY

WN U-75

First Revision of Sheet No. 73.1
Canceling Original Sheet No. 73.1

**Schedule 73
RENEWABLE ENERGY RIDER – OPTIONAL BULK PURCHASE OPTION**

AVAILABLE:

In all territory served by Company in the State of Washington.

APPLICABLE:

To non-residential Customers receiving service under the Company's electric rate Schedules.

ADMINISTRATION:

Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases to Block purchases may be used to fund Qualifying Initiatives as defined below.

BLOCK:

1 Block equals 100 kWh of Renewable Energy. This program requires a minimum purchase of 121.2 megawatt-hours (121,200 kWh or 1,212 Blocks) per year. For the purpose of qualifying for this Schedule, Customers with multiple sites can sum their Block purchases across all Pacific Power & Light Company and Rocky Mountain Power service territories to meet the minimum purchase requirement.

CHARGE PER BLOCK:

\$0.70 per month per 100 kWh block Plus
\$1,500.00 per year fixed charge

For purchase commitments over two years in length or large purchases over 75,000 MWh per year, individually negotiated contracts may be available, pursuant to the execution of a written contract.

CHARGE:

The Charge can be billed either monthly, twice yearly or annually and shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block, plus the \$1,500.00 yearly fixed charge divided between the Customer's billing choice (monthly, twice yearly or annually) and added to the Customer's standard bill. The Charge is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Charge shall be applied to the Customer's billing regardless of actual energy consumption.

RENEWABLE ENERGY:

Renewable Energy includes bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;
- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;

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Issued: September 28, 2012
Advice No. 12-06

Effective: October 28, 2012

Issued By Pacific Power & Light Company

By: William R. Griffith William R. Griffith

Title: Vice President, Regulation

Schedule 73
RENEWABLE ENERGY RIDER – OPTIONAL BULK PURCHASE OPTION

RENEWABLE ENERGY: (continued)

- pipeline or irrigation canal hydroelectric systems;
- wave or tidal action; and
- low emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste; and
- biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservations such as creosote, pentachlorophenol or copper chrome arsenic.

Renewable Energy Credits (also known as Tradable Renewable Energy Credits, Renewable Energy Certificates, Green Tags or Carbon Credits) represent all of the regional and global environmental and emissions benefits associated with one unit of output from a qualifying renewable electricity generating resource. In some markets, the credits are certified by an independent third party and include a serial number for tracking purposes.

Offering must consist of 100% new Renewable Energy.

New Renewable Energy is (1) placed in operation (generating electricity) on or after January 28, 2000; (2) repowered on or after January 28, 2000 such that 80% of the fair market value of the project derives from new generation equipment installed as part of the repowering, or (3) a separable improvement to or enhancement of an operating existing facility that was first placed in operation prior to January 28, 2000, such that the proposed incremental generation is contractually available for sale and metered separately than existing generation at the facility. Any enhancement of a fuel source that increases generation at an existing facility, without the construction of a new or repowered, separately metered generating unit, is not eligible to participate.

Preference will be given to resources within Pacific Power & Light Company and Rocky Mountain Power service territories.

Renewable Energy purchases made to match Customer Block purchases are in addition to investments associated with the Company's Integrated Resource Plan, and are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in responses to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

QUALIFYING INITIATIVES:

1. Funding for locally-owned commercial-scale Renewable Energy projects that produce less than 10 MW of electricity. The preference is for local community based projects that provide strong environmental and economic benefit to local communities and Customers the Company services under this Schedule.
2. Funding for research and development projects encouraging Renewable Energy market transformation in order to accelerate marketability of Renewable Energy technologies.

(continued)

Issued: May 13, 2011
Advice No. 11-01

Effective: June 13, 2011

Issued By Pacific Power & Light Company

By: Andrea Kelly Andrea L. Kelly

Title: Vice President, Regulation

Schedule 73
RENEWABLE ENERGY RIDER – OPTIONAL BULK PURCHASE OPTION

QUALIFYING INITIATIVES: (continued)

3. Investment in the above-market costs associated with the construction of Renewable Energy facilities or purchase by contract of Renewable Energy, reducing the costs of Renewable Energy to be competitive with cost-effective resources.
4. To the extent a project in paragraphs 1, 2, and 3 above is able to generate RECs, the recipient agrees that the Company has the right to claim a share of the project's REC output. The share amount is expressed as a percentage of output when comparing the Company's financial contribution to the overall cost of the project. The share amount of these RECs will be retired on behalf of program participants across the Company's service territories. The Company will also be given the opportunity to purchase additional RECs off the project.
5. Qualifying Initiatives are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

SPECIAL CONDITIONS:

1. Customers may apply for or terminate from this Schedule anytime during the year.
2. The Company may accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected within the last 12 months.
3. The Company will deliver Renewable Energy within two years of a Customer's purchase.
4. To ensure that all costs and benefits of this program are isolated to the participants of this program, all funds collected under this program will be separately identified and tracked. On the effective date of this Schedule, the Company will establish a regulatory liability for all funds collected and will debit the regulatory liability as funds are spent. The Company will endeavor to match spending to collection within each calendar year.

RULES AND REGULATIONS:

Service under this Schedule is subject to the General rules and Regulations contained in the tariff of which this Schedule is a part and to those prescribed by regulatory authorities.

Issued: May 13, 2011
Advice No. 11-01

Effective: June 13, 2011

Issued By Pacific Power & Light Company

By: Andrea Kelly Andrea L. Kelly

Title: Vice President, Regulation



I.P.U.C. No. 1

Third Revision of Sheet No. 73.1
Canceling Second Revision of Sheet No. 73.1

ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 73

STATE OF IDAHO

**Renewable Energy
Rider – Optional**

Bulk Purchase Option

AVAILABILITY: In all territory served by the Company in the state of Idaho.

APPLICATION: To Customers receiving service under The Company's non-residential Electric Service Schedules.

ADMINISTRATION: Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases to Block purchases may be used to fund Qualifying Initiatives as defined below.

BLOCK: 1 Block equals 100 kWh of Renewable Energy. This program requires a minimum purchase of 121.2 megawatt-hours (121,200 kWh or 1,212 Blocks) per year. For the purpose of qualifying for this Schedule, Customers with multiple sites can sum their Block purchases across all Pacific Power & Light Company and Rocky Mountain Power service territories to meet the minimum purchase requirement.

CHARGE PER BLOCK: \$0.70 per month per 100 kWh block
Plus \$1,500.00 per year fixed charge

For Purchase commitments over two years in length or large purchases over 75,000 MWh per year, individually negotiated arrangements may be available, pursuant to the execution of a written contract.

CHARGE: The Charge can be billed either monthly, twice yearly or annually and shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block, plus the \$1,500 yearly fixed charge divided between the customer's billing choice (monthly, twice yearly or annually) and added to the Customer's standard bill. The Charge is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Charge shall be applied to the Customer's billing regardless of actual energy consumption.

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Submitted Under Advice Letter No. 12-02

FILED: October 2, 2012

EFFECTIVE: November 2, 2012

ELECTRIC SERVICE SCHEDULE NO. 73 - Continued

RENEWABLE ENERGY: Renewable Energy includes bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;
- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;
- pipeline or irrigation canal hydroelectric systems;
- wave or tidal action; and
- low emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservations such as creosote, pentachlorophenol or copper chrome arsenic.

Renewable Energy Credits (also known as Tradable Renewable Energy Credits, Renewable Energy Certificates, Green Tags or Carbon Credits) represent all of the regional and global environmental and emissions benefits associated with one unit of output from a qualifying renewable electricity generating resource. In some markets, the credits are certified by an independent third party and include a serial number for tracking purposes.

Offering must consist of 100% new Renewable Energy.

New Renewable Energy is (1) placed in operation (generating electricity) on or after January 28, 2000; (2) repowered on or after January 28, 2000 such that 80% of the fair market value of the project derives from new generation equipment installed as part of the repowering, or (3) a separable improvement to or enhancement of an operating existing facility that was first placed in operation prior to January 28, 2000, such that the proposed incremental generation is contractually available for sale and metered separately than existing generation at the facility. Any enhancement of a fuel source that increases generation at an existing facility, without the construction of a new or repowered, separately metered generating unit, is not eligible to participate.

Preference will be given to resources within Pacific Power & Light Company and Rocky Mountain Power service territories.

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ELECTRIC SERVICE SCHEDULE NO. 73 – Continued

RENEWABLE ENERGY: (continued)

Renewable Energy purchases made to match Customer Block purchases are in addition to investments associated with the Company's Integrated Resource Plan, and are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

QUALIFYING INITIATIVES

1. Funding for locally-owned commercial-scale Renewable Energy projects that produce less than 10 MW of electricity. The preference is for local community based projects that provide strong environmental and economic benefit to local communities and Customers the Company services under this Schedule.
2. Funding for research and development projects encouraging Renewable Energy market transformation in order to accelerate marketability of Renewable Energy technologies.
3. Investment in the above market costs associated with the construction of Renewable Energy facilities or purchase by contract of Renewable Energy, reducing the costs of Renewable Energy to be competitive with cost-effective resources.
4. To the extent a project in paragraphs 1, 2, and 3 above is able to generate RECs, the recipient agrees that the Company has the right to claim a share of the project's REC output. The share amount is expressed as a percentage of output when comparing the Company's financial contribution to the overall cost of the project. The share amount of these RECs will be retired on behalf of program participants across the Company's service territories. The Company will also be given the opportunity to purchase additional RECs off the project.
5. Qualifying Initiatives are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

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ELECTRIC SERVICE SCHEDULE NO. 73 – Continued

SPECIAL CONDITIONS:

1. Customers may apply for this Schedule anytime during the year.
2. The Company may accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected within the last 12 months.
3. The Company will purchase Renewable Energy within two years of a Customer's purchase.
4. To ensure that all costs and benefits of this program are isolated to the participants of this program, all funds collected under this program will be separately identified and tracked. On the effective date of this Schedule, the Company will establish a regulatory liability for all funds collected and will debit the regulatory liability as funds are spent. The Company will endeavor to match spending to collection within each calendar year.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Idaho Public Utilities Commission, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

ATTACHMENT 2

Pacific Power's April 16, 2016 Letter filing, Docket UM 1690

April 14, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Attn: Filing Center

Re: Docket UM 1690

In Order No. 15-405 in docket UM 1690, the Public Utility Commission of Oregon (Commission) deferred for future consideration the issue of whether it is in the public interest for utilities to offer voluntary renewable energy tariffs (VRET). To facilitate consideration of this threshold question, the Commission encouraged PacifiCorp d/b/a Pacific Power (Pacific Power or the Company) and Portland General Electric (PGE) to file VRET proposals by April 14, 2016. The order presented certain guidelines for the utilities to follow in preparing VRET proposals. The VRET guidelines:

- Applied Renewable Portfolio Standard (RPS) definitions to the VRET;
- Restricted VRET offerings to bundled REC products from facilities with online dates no earlier than 2015;
- Required retirement of renewable energy certificates on behalf of participating customers;
- Restricted VRET participation to a total program cap of 175 aMW for Pacific Power;
- Required VRET design to be “sufficiently differentiated” from direct access, but with terms and conditions that “mirror” direct access;¹
- Allowed utility ownership of VRET resources along with an associated return on the utility investment, provided the utility does not include the VRET resource in rate base and the utility credits back to customers some of the return;
- Required costs to be independently reviewed and verified by the Commission, and risks to be borne by program participants, developers, or utility shareholders; and
- Required public availability and review by the Commission of all VRET offerings.

Pacific Power appreciates the hard work of Staff and stakeholders in developing a framework for consideration of a VRET. Pacific Power is equally appreciative of the considered deliberation of the Commission in creating the criteria a VRET proposal must meet. The Company remains

¹ Alternatively, the guidelines specify that VRET program elements that do not mirror direct access must be accompanied by proposed changes to direct access to ensure consistency between the two programs.

Docket No. UM 1690
Public Utility Commission of Oregon
April 14, 2016

committed to exploring “green” energy options responsive to the unique needs of our customers. Based on the Company’s discussions and research, Pacific Power is not able to develop a tariff-based program that meets the needs of customers while conforming to the narrow constraints of the VRET guidelines established by the Commission.

Pacific Power looks forward to continuing to work with customers, the Commission and policymakers to find ways to ensure that customers are able to meet their renewable and green energy goals within the state of Oregon.

Sincerely,

A handwritten signature in black ink that reads "R. Bryce Dalley" with a stylized flourish at the end.

R. Bryce Dalley
Vice President, Regulation