



May 31, 2016

Oregon Public Utility Commission
ATTN: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3612

**RE: 2015 Redacted RPS Report for Noble Americas Energy Solutions LLC;
Docket No: UM - _____**

To Whom It May Concern:

Please find attached the Redacted Renewable Portfolio Standard Report for Calendar Year 2015 for Noble Americas Energy Solutions LLC ("Noble Solutions"). A version of this report that states the figures Noble Solutions has redacted here is being sent to the Public Utility Commission via FedEx.

In addition to the requirements of this report, Noble Solutions is including Attachment C in both the confidential and public version. This attachment shows the location, resource type, vintage year, and percentage of total RECs coming from each state that will be used for Noble Solutions' Oregon RPS compliance in 2015.

Should you have any questions or concerns, please contact me at 619-684-8200.

Thank you,

A handwritten signature in blue ink that reads 'Bryan C. White'.

Bryan C. White
Regulatory Compliance Analyst

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM - _____

In the Matter of

Noble Americas Energy Solutions LLC's

2015 RPS Report

**NOBLE AMERICAS ENERGY
SOLUTIONS LLC'S RPS REPORT**

2015 RPS Report

for

Noble Americas Energy Solutions LLC

DATED: May 31, 2016

**Bryan White
619-684-8200
Regulatory Compliance Analyst
Noble Americas Energy Solutions LLC
401 West A Street, Ste 500
San Diego, CA 92101**

Noble Americas Energy Solutions LLC ("Noble Solutions")
Renewable Portfolio Standard
Oregon Compliance Report
2015
UM - _____

As an introduction and summary of the Compliance Report, answer the following questions:

Why is Noble Solutions submitting a Compliance Report? What information was used as the basis of the Compliance Report?

Noble Solutions is submitting a Compliance Report to demonstrate compliance with the Oregon Department of Energy's RPS guidelines for 2015.

Did the company meet its Renewable Portfolio Standard (RPS) target, and if not, describe in detail why not?

Noble Solutions

Provide the following information in response to the requirements of OAR 860-083-0350:

OAR 860-083-0350(2)(a): The total number of megawatt-hours sold to retail electricity consumers covered by ORS 469A.052 by the electric company or sold in the service areas of each electric company covered by ORS 469A.052 by the electricity service supplier.

Noble Solutions' load in 2015

OAR 860-083-0350(2)(b): The total number of renewable energy certificates, identified as either unbundled or bundled certificates, acquired in the compliance year and used to meet the renewable portfolio standard.

RECs.

OAR 860-083-0350(2)(c): The total number of renewable energy certificates, identified as either unbundled or bundled certificates, acquired on or before March 31 of the year following the compliance year and used to meet the renewable portfolio standard.

RECs.

OAR 860-083-0350(2)(d): The total number and cost of unbundled renewable energy certificates, identified as either banked or non-banked certificates, used to meet the renewable portfolio standard.

RECs at a cost of \$

OAR 860-083-0350(2)(e): The total number of banked bundled renewable energy certificates that were used to meet the renewable portfolio standard.

RECs.

OAR 860-083-0350(2)(f): The total number of renewable energy certificates, identified as either bundled or unbundled certificates, issued in the compliance year that were banked to serve Oregon electricity customers.

RECs.

OAR 860-083-0350(2)(g): For electric companies, unless otherwise provided under subsection (2)(k) of this rule, the total number of renewable energy certificates included in the rates of Oregon retail electricity consumers that were sold since the last compliance report, including:

- (A) The names of the associated generating facilities; and
- (B) For each facility, the year or years the renewable energy certificates were issued.

N/A

OAR 860-083-0350(2)(h): Unless otherwise provided under subsection (2)(k) of this rule, for each generating facility associated with the renewable energy certificates included in subsections (2)(b), (c), (f), or (g) of this rule the following information:

- (A) The name of the facility;
- (B) The county and state where the facility is located;
- (C) The type of renewable resource;
- (D) The total nameplate megawatt capacity of the facility;
- (E) For an electric company, the Oregon share of the nameplate megawatt capacity of the facility;
- (F) The year of the first delivery of qualifying electricity or the first year of the contract for the purchase of unbundled renewable energy certificates; and
- (G) The duration of the contract or the amortization period of a facility owned by the electric company or the planned lifetime of a facility owned by the electricity service supplier.

Please see Attachment A.

OAR 860-083-0350(2)(i): The amount of alternative compliance payments the electric company or electricity service supplier elected to use or was required to use to comply with the applicable renewable portfolio standard.

Noble Solutions

OAR 860-083-0350(2)(j): For an electric company, sufficient data, documentation, and other information to demonstrate that any voluntary alternative compliance payments were a reasonable compliance method.

Noble Solutions

OAR 860-083-0350(2)(k): Documentation of use of renewable energy certificates from the system under OAR 330-160-0020 established for compliance with the applicable renewable portfolio standard.

Please see Attachment B for a printout of the RECs set to be retired in WREGIS upon the Commission's approval of this filing.

OAR 860-083-0350(2)(l): For each electric company, a detailed explanation of any material deviations from the applicable implementation plan filed under OAR 860-083-0400, as acknowledged by the Commission.

OAR 860-083-0350(2)(m): As specified in OAR 860-083-0100, the total number and cost of bundled renewable energy certificates used for compliance.

Noble Solutions

OAR 860-083-0350(2)(n): For each electric company, its projected annual revenue requirement as calculated in OAR 860-083-0200 and its total cost of compliance.

OAR 860-083-0350(2)(o): For each electricity service supplier, its total cost of compliance, its average cost of compliance, and its cost limit as specified in OAR 860-083-0300(2), including all calculations.

Row	Description	Pacificorp	Portland General
A	Utility Load (retail + ESS)*	12,863,580	17,715,390
B	Utility Revenue per MWh*	\$99.30	\$97.90
C	Noble Retail Load in MWh		
D	Noble Total Revenue		
E	Noble Average Rev. = Noble Rev. (D) / Noble MWh (C)		
F	Noble Load (C) / Utility Load (A)		
G	Weighted Average = (Row F X E) + ([1-F] X B)		
H	Weighted Average		
I	Weighted Average X 4%		
J	Total Cost of RECs = RECs X		
K	ESS Cost of Compliance =		Noble Load in MWh
L	/ Noble Load in MWh (C)		
M	Is Cost of Comp. > Weighted Avg. X 4%?		

OAR 860-083-0350(2)(p): For each electric company, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in ORS 469A.100(1) is reached for the compliance year.

OAR 860-083-0350(2)(q): For each electricity service supplier, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in OAR 860-083-0300(2) is reached for the compliance year.

OAR 860-083-0350(2)(r): As specified in OAR 860-083-0100, the number and total cost of all bundled renewable energy certificates issued.

Noble Solutions

OAR 860-083-0350(2)(s): As specified in OAR 860-083-0100, the number and total cost of bundled renewable energy certificates issued that are associated with new qualifying electricity since the last compliance report.

Noble Solutions

OAR 860-083-0350(6): Each electric company subject to ORS 469A052 and each electricity service supplier subject to ORS 469A065 must post on its web site the public portion of the four most recent annual compliance reports required under this rule and provide a copy of the most recent such report to any person upon request. The public portions of the most recent compliance report must be posted within 30 days of the Commission decision in section (5) of this rule. The posting must include any Commission determinations under section (5) of this rule.

Noble Solutions will post the public portion of this report on its website within 30 days of the Commission's decision.

OAR 860-083-0350(7): Consistent with Commission orders for disclosure under OAR 860-038-0300, each electric company subject to ORS 469A.052 and each electricity service supplier subject to ORS 469A.065 must provide information about its compliance report to its customers by bill insert or other Commission-approved method. The information must be provided within 90 days of the Commission decision in section (5) of this rule or coordinated with the next available insert required under OAR 860-038-0300. The information must include the URL address for the compliance reports posted under section (6) of this rule.

Noble Solutions will, on its physical invoices, include a link to the public information in this report to its customers within 90 days of the Commission's decision.

Attachment A

Name of Generator	County and State of Facility	Type of Resource	Total Nameplate Capacity	Oregon Share of Nameplate Capacity	Year of First Delivery	Duration of Contract
[Redacted Content]						

Attachment B

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Wind

Attachment C

<u>Location</u>	<u>Resource Type</u>	<u>Vintage Year</u>	<u>% of 2015 RPS Compliance</u>
BC	Hydro	2009	1.9%
BC	Hydro	2010	8.0%
ID	Wind	2009	8.1%
NM	Wind	2011	8.7%
OR	Biomass	2009	0.9%
OR	Wind	2009	6.5%
OR	Wind	2010	40.6%
OR	Wind	2011	11.8%
WA	Wind	2009	1.0%
WA	Wind	2010	6.8%
WA	Wind	2011	2.2%
WY	Wind	2009	2.3%
WY	Wind	2011	1.2%

Attachment D

Note: All RECs proposed to be retired for 2015 RPS either are marked “Yes” in WREGIS, are specified in one of the attached attestations from the ODOE stating their earliest eligible vintage month, or are associated with generation from on or after the earliest eligible vintage month in the ODOE’s “RPS Approved Generators” list that was updated in December 2015. The three generators with RECs that Noble Solutions proposes to retire for 2015 RPS that fall into the latter-most category are:

Generator Name	WREGIS ID	Earliest Vintage to be Retired	Earliest Eligible Vintage per the ODOE