


1 acknowledge PacifiCorp's 2016 RPIP with conditions. The conditions would include the
2 following:

3 The Commission acknowledges PacifiCorp's 2016 RPIP accompanied with a finding that
4 the RPIP is insufficient in light of the passage of SB 1547. The Commission would further
5 require PacifiCorp to file a new RPIP no later than July 15, 2016 (July RPIP). The July RPIP
6 would be considered an entirely new filing. The July RPIP filing would include a complete
7 analysis of SB 1547 which addresses, at a minimum, the matters set forth in Attachment A to this
8 Motion. In its Order, the Commission would then close Docket UM 1754. The Commission's
9 Order would not address or represent a decision on any of the issues raised by Staff and the
10 intervenors in their comments submitted in UM 1754. Those issues would be considered
11 preserved for further resolution in the RPIP proceeding that commences with PacifiCorp's July
12 RPIP filing.

13 DATED this 20th day of April, 2016.

14 Respectfully submitted,

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16 Attorney General

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19 Assistant Attorney General
20 Of Attorneys for Staff of the Public Utility
21 Commission of Oregon
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ATTACHMENT A

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2 In addition to a providing quantitative analysis to meet 2016 Renewable Portfolio
3 Implementation Plan (RPIP) requirements, PacifiCorp should provide a complete and thorough
4 narrative describing its plan to satisfy the Renewable Portfolio Standard (RPS) compliance
5 requirements of SB 1547 from 2017 through 2040.

6 At a minimum, the July RPIP should include:

- 7 1. A discussion of the differences between SB 838 (i.e. ORS 469A.005 to ORS
8 469A.210) and SB 1547, with supporting analysis demonstrating the impacts of those
9 differences on utility planning and operations decisions 2017-2040.
- 10 2. An analysis of these aspects of SB 1547: its elimination of the “first in, first out”
11 requirement, its creation of unlimited Renewable Energy Credit (REC) life status for
12 the first five years of new resources acquired between 2016-2022, its shortening of
13 the standard REC life, and the steep compliance rate increase between 2025 and
14 2030. In particular, the analysis should address how these aspects of SB 1547 affect
15 how the utility plans to optimize the mix of compliance RECs for least cost and
16 lowest risk.
- 17 3. A discussion of how the timing of new renewable resource acquisitions impact long
18 term cost of compliance with the RPS to ratepayers with supporting analysis
19 demonstrating these differences in timing. Under what conditions does the least
20 cost/lowest risk strategy to satisfy the RPS compliance requirements of SB 1547 from
21 2017 through 2040 lead to new resource acquisition prior to a physical need and how
22 will the utility evaluate this decision? PacifiCorp should provide a “tipping-point”
23 analysis that depicts when physical resource acquisition is more cost effective than
24 buying unbundled RECs.
- 25 4. A discussion of how key market assumptions impact the relative range of risk and
26 uncertainty related to cost over the compliance horizon. Load growth, hydroelectric

1 generation, project cost, natural gas and electricity market prices are some examples
2 of key assumptions to be assessed in this discussion.

- 3 5. Throughout the analysis, PacifiCorp should provide methodologies and assumptions
4 used to support the RPIP along with a narrative describing the reasoning behind the
5 selection of those methodologies and assumptions.