1	BEFORE THE PUBLIC UTILITY COMMISSION			
2	OF OREGON			
3	UM 1754			
4	In the Matter of			
5 6	UNOPPOSED MOTION FOR COMMISSION ORDER ACKNOWLEDGING PACIFICORP'S CURRENTLY-FILED IMPLEMENTATION PLAN WITH CONDITIONS AND CLOSING DOCKET			
7.	2017-2021 Renewable Portfolio Standard Implementation Plan.			
9	Pursuant to OAR 860-001-0390, Staff of the Public Utility Commission of Oregon (Staff)			
10	requests the Commission to immediately acknowledge PacifiCorp's (PacifiCorp or Company)			
11	2016 Renewable Portfolio Implementation Plan (RPIP) with conditions as more fully described			
12	below. Staff is authorized to state that all active parties to this docket either support this Motion			
13	or do not oppose it.			
14	At its core, this Motion is presented in order to allow sufficient time for PacifiCorp to re-			
15	work its RPIP so that it includes an analysis about the impact of Senate Bill (SB) 1547 upon its			
16	RPIP. PacifiCorp agreed to provide such an analysis but the Company also stated it would take			
17	several months to complete. After discussions, PacifiCorp agreed to Staff's request that it use its			
18	"best efforts" to submit as complete and thorough analysis as is possible by July 15, 2016.			
19	Having reached this agreement, the parties recognize and acknowledge that the July 2016 filing			
20	date will not allow PacifiCorp an opportunity to include the results of its recently-issued Request			
21	for Proposal (RFP) for Renewable Resources when its new RPIP is filed in July 2016.			
22	As brief background, PacifiCorp filed its 2016 RPIP on December 29, 2015. ORS			
23	469A.075(3) requires the Commission to acknowledge the RPIP "no later than six months after			
24	the plan is filed with the Commission." The statute further allows the Commission to			
25	acknowledge the RPIP subject to conditions. After discussion, the parties agreed that, in light of			
26	the time constraints set by ORS 469A.075(3), the best procedural path is for the Commission to			

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 day of April, 2016.			
14	Respectfully submitted,			
15	ELLEN F. ROSENBLUM Attorney General			
16	Attorney General			
17	Michael T. Weirich, #82425			
18	Assistant Attorney General Of Attorneys for Staff of the Public Utility			
19	Commission of Oregon			
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1		ATTACHMENT A	
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.		
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7		a minimum, the July RPIP should include:	
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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	<i>y</i>	requirement, its creation of unlimited Renewable Energy Credit (REC) life status for	
12	a. Je	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	

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4. A discussion of how key market assumptions impact the relative range of risk and

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.
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