

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Continue  
Implementation and Administration of California  
Renewables Portfolio Standard Program.

Rulemaking 11-05-005  
(Filed May 5, 2011)

**PACIFICORP'S (U 901-E) 2013 INTEGRATED RESOURCE PLAN  
ON-YEAR SUPPLEMENT**

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Date: May 30, 2013

Attorney for PacifiCorp

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OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
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Rulemaking 11-05-005  
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**PACIFICORP'S (U 901-E) 2013 INTEGRATED RESOURCE PLAN  
ON-YEAR SUPPLEMENT**

Pursuant to *Assigned Commissioner's Ruling Identifying Issues and Schedule of Review for 2013 Renewables Portfolio Standard Procurement Plans Pursuant to Public Utilities Code Section 399.11 Et Seq. and Requesting Comments on A New Proposal*, issued May 10, 2013 (Ruling), PacifiCorp, d/b/a Pacific Power (PacifiCorp or Company) (U 901-E) respectfully submits this supplement to its 2013 Integrated Resource Plan (2013 IRP On-Year Supplement), attached hereto as Attachment A. PacifiCorp filed its 2013 Integrated Resource Plan (2013 IRP) on April 30, 2013; for ease of reference a link to PacifiCorp's 2013 IRP is provided here: <http://www.pacificorp.com/es/irp.html>.

**I. INTRODUCTION**

As noted in the Ruling, SB 2 1X<sup>1</sup> continues the ability of a multi-jurisdictional utility (MJU), such as PacifiCorp, to use an IRP prepared for regulatory agencies in other states to satisfy the renewables portfolio standard (RPS) procurement plan requirement, so long as the IRP complies with the requirements specified in Pub. Util. Code § 399.17(d). Under the prior RPS program, in D.08-05-029 (SMJU Order), the Commission authorized PacifiCorp to use its IRP, as supplemented with annual filings, to fulfill the requirement to prepare a renewable energy procurement plan.<sup>2</sup> The Commission required MJUs to file IRPs in years in which IRPs were filed in other jurisdictions as well as file certain supplemental information. The SMJU

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<sup>1</sup> SB 2 1X (Simitian, Stats. 2011, ch.1).

<sup>2</sup> See D.08-05-029, p. 17; see also D.08-05-029, Ordering Paragraph 10 and D.11-04-030, Ordering Paragraph 4.

Order directed MJUs to file supplements in years in which the IRP is filed (on-year supplement) as well as years in which an IRP is not filed (off-year supplement).<sup>3</sup> The on-year supplement was to include an analysis of how the IRP and supplement comply with the requirements set out in former § 399.17(d).<sup>4</sup> The off-year supplement was to address the year ahead and include certain summary information specified in the SMJU Order.<sup>5</sup> Accordingly, the Company filed its 2013 IRP in this docket on April 30, 2013, when the IRP was filed in other jurisdictions. Consistent with the SMJU Order and Ruling, the Company is filing its 2013 IRP On-Year Supplement on May 30, 2013.

Under the Ruling, PacifiCorp is directed to file its 2013 IRP On-Year Supplement with an explanation of how the IRP and supplement meets the requirements of § 399.17(d).<sup>6</sup> As such, PacifiCorp provides below additional background information on its IRP and planning processes, how the 2013 IRP relates to California RPS compliance, and how the 2013 IRP complies with the requirements of § 399.17(d). Supplemental information needed to meet the requirements of § 399.17(d) is included in PacifiCorp's 2013 IRP On-Year Supplement, provided as Attachment A.

## **II. INTEGRATED RESOURCE PLANNING**

PacifiCorp is an MJU providing electric retail service to approximately 1.8 million customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. Of those customers, approximately 45,000 are located in Del Norte, Modoc, Shasta, and Siskiyou counties in northern California.

PacifiCorp's owned-generation portfolio is a mix of assets located within nine western states (Arizona, California, Colorado, Idaho, Montana, Oregon, Utah, Washington, and Wyoming). Consistent with a long-standing regulatory practice agreed to among the various

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<sup>3</sup> See. D.08-05-029, p. 20.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> Ruling at 6.

state commissions regulating PacifiCorp, all energy produced by PacifiCorp-owned resources, as well as purchased energy delivered pursuant to power purchase agreements, is referred to as “system” power. System power is electricity that is not assigned by PacifiCorp for use within a particular state or Balancing Authority Area and is managed on a system-wide basis. PacifiCorp combines all of the costs for generating and maintaining the appropriate level of power within the system and allocates to each jurisdiction its proportionate share of system resources based upon each state’s relative contribution to system peak and energy requirements. PacifiCorp’s California retail customers contribute slightly less than two percent of PacifiCorp’s system requirements.

As a result of this shared resources approach, PacifiCorp’s states receive the cost savings associated with resource and usage diversification and the Commission has relied on a system-wide approach to planning and operating PacifiCorp’s system for decades, to the benefit of PacifiCorp’s California customers.

The majority of PacifiCorp’s owned renewable resources are eligible and certified for California’s RPS program. As described above, the allocation methodology allocates approximately two percent of the costs and renewable energy credits (RECs) of those resources to California for RPS compliance purposes. The remaining costs and RECs of renewable resources are, for the most part, allocated to PacifiCorp’s other five jurisdictions.

### **III. ANALYSIS**

The following analysis provides an explanation of how PacifiCorp’s 2013 IRP meets the requirements of Pub. Util. Code § 399.17(d). Section 399.17(d) requires PacifiCorp to maintain compliance with Pub. Util. Code §§ 399.13, 399.14, and 399.25. Thus, the below analysis includes an assessment of how PacifiCorp’s 2013 IRP meets these requirements. Supplemental information is provided in Attachment A.

**A. Section 399.13**

Section 399.13 generally sets forth the requirements directing each utility to annually prepare a renewable energy procurement plan that is consistent with the goal of increasing California's reliance on renewable energy resources. In general, PacifiCorp's IRP process complies with the requirements of § 399.17(d) by considering and incorporating the acquisition of significant renewable resources as a part of PacifiCorp's long-term procurement strategy, among other things. PacifiCorp has actively pursued and will be pursuing the required amounts of renewable resources to achieve RPS compliance in California and other states. Typically, resource acquisition is conducted through competitive bidding processes and a request for proposal (RFP) process.

Renewable resources identified in PacifiCorp's 2013 IRP to be acquired by the Company include renewable resources and tradable RECs. PacifiCorp intends to meet California RPS program requirements with: 1) existing eligible renewable energy procured within PacifiCorp's system, consistent with PacifiCorp's integrated system planning for its multi-state service territory and overall system operation; and 2) with tradable RECs procured through the issuance of RFPs seeking current-year or forward-year vintage unbundled RECs that will qualify for California renewable portfolio standard obligations. See 2013 IRP Chapter 9 Action Plan (p. 245<sup>7</sup>).

PacifiCorp's 2013 IRP provides a thorough multi-year assessment of future resource options and forecasted demand to determine the optimal mix of renewable energy resources considering RPS compliance requirements and other state-specific resource policies and constraints. A detailed description of PacifiCorp's resource assessment and modeling approach can be found in Chapter 7 (pp.157-200) of the 2013 IRP with the results outlined in Chapter 8

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<sup>7</sup> Unless otherwise noted, all page references are to Volume I of the 2013 IRP.

(pp.201-241). Specifically, the 2013 IRP contains a robust assessment of supply and demand from 2013 through 2032, focusing on the first 10-year period, 2013 through 2022. In addition, PacifiCorp optimizes its entire service territory's energy resource portfolio from 2013 through 2032.

**B. Section 399.13(a)(2)**

Section 399.13(a)(2) requires that every electrical corporation that owns electrical transmission facilities shall annually prepare, as part of the FERC Order No. 890 process, and submit to the Commission, a report identifying any electrical transmission facility, upgrade, or enhancement that is reasonably necessary to achieve the renewables portfolio standard procurement requirements of this article. Chapter 4 (pp.55-77) of PacifiCorp's 2013 IRP includes detailed background, status and schedule information for PacifiCorp's transmission expansion plans. Further information on transmission planning is provided in Attachment A section 2 of the 2013 IRP On-Year Supplement.

**C. Section 399.13(a)(5)(A)**

Section 399.13(a)(5)(A) requires an assessment of annual or multiyear portfolio supplies and demand to determine the optimal mix of eligible renewable energy resources with deliverability characteristics that may include peaking, dispatchable, baseload, firm, and as-available capacity.

Chapters 5 (pp.79-105) and 6 (pp.107-155) of PacifiCorp's 2013 IRP provide a thorough multi-year assessment of portfolio resource need and forecasted demand to determine the optimal mix of renewable energy resources. The resource options are outlined in Chapter 6 (pp. 107-155) and Chapter 8 (pp. 201-241) provides the renewable requirement by year to meet the renewable portfolio standard in California. Specifically, the 2013 IRP contains a robust assessment of supply and demand from 2013 through 2032, focusing on the first 10-year period,

2013 through 2022. PacifiCorp optimizes its entire service territory's energy resource portfolio from 2013 through 2032. Chapter 7 (pp.157-200) of the 2013 IRP includes a detailed description of PacifiCorp's IRP modeling approach – which PacifiCorp uses to identify the optimal mix of renewable energy resources. Figure 8.32 (p.233) of the 2013 IRP depicts the breakdown of resource mix and illustrates how PacifiCorp plans on meeting its California RPS compliance obligation through 2022. Further information regarding how PacifiCorp assesses renewable resources and the nature of the RPS procurement that PacifiCorp intends to use to satisfy its RPS procurement requirements is contained in Attachment A section 3 of the 2013 IRP On-Year Supplement.

**D. Section 399.13(a)(5)(B)**

Section 399.13(a)(5)(B) requires an assessment of certain potential compliance delays. Chapters 6 (pp.107-155) and 7 (pp.157-200) of the 2013 IRP generally describe PacifiCorp's approach to modeling and risk assessment. The 2013 IRP also describes how PacifiCorp anticipates using banked renewable energy credits and tradable RECs to meet its RPS requirements (Chapter 7 Modeling Approach, pp. 186-187). Additional information regarding potential issues that could delay PacifiCorp's RPS compliance and PacifiCorp's efforts to minimize any delay is included in Attachment A sections 4 and 5 of the 2013 IRP On-Year Supplement.

**E. Section 399.13(a)(5)(D)**

Section 399.13(a)(5)(D) requires a status update on the development schedule of all eligible renewable energy resources currently under contract.

A status update on the development schedule of the resources reported in the 2011 IRP Off-Year Supplement filed in July 2012 as well as new resources since the date of that filing is included in Attachment A section 4 of the 2013 IRP On-Year Supplement.

**F. Section 399.13(a)(5)(F)**

Section 399.13(a)(5)(F) requires an assessment of the risk that an eligible renewable energy resource will not be built, or that construction will be delayed, with the result that electricity will not be delivered as required by the contract.

Chapter 9 (p.264) of the 2013 IRP includes an acquisition path analysis that specifies contingency strategies tied to significant changes in resource planning conditions. Further details on the core case analysis, the planning and risk modeling, and the case study fact sheets used for the core case studies and sensitivity case studies are provided in Volume II of the 2013 IRP, Appendices K (pp.153-266), L (pp.267-287), and M (pp.289-353), respectively. These contingency strategies should adequately cover potential contract failures, procurement delays, and increased resource need resulting from such regulatory trigger events as new RPS and greenhouse gas mitigation rules. Additional information regarding how PacifiCorp assesses risk of failure to build or construction delays and how the risk assessment impacts PacifiCorp's net short position and procurement decisions is included in Attachment A sections 5 and 6 of the 2013 IRP On-Year Supplement.

**G. 399.13(a)(5)(A), (B), (D), and (F)**

In addition to the above qualitative requirements, sections 399.13(a)(5)(A), (B), (D), and (F) require certain quantitative information.

Though not referred to as "procurement net short" position in PacifiCorp's 2013 IRP, an assessment of PacifiCorp's RPS portfolio needs and compliance position in each state that has renewable portfolio standards is included in the 2013 IRP. Through its IRP process, PacifiCorp assesses its compliance and "net short" position in all states that have RPS requirements. A summary of the approach and assessment is provided in Chapter 7 (p. 186) and 8 (pp. 201-241), and a summary of the assessment is provided in Figure 8.32 (p.233) of the 2013 IRP. Further

information regarding the development of PacifiCorp's RPS portfolio and assumptions used in developing its net short position is included in Attachment A section 6 of the 2013 IRP On-Year Supplement.

**H. Section 399.14**

Section 399.14 sets forth the requirements for an application by an electrical corporation to construct, own and operate an eligible renewable energy resource. Information regarding PacifiCorp's compliance with this requirement is included in Attachment A section 7 of the 2013 IRP On-Year Supplement.

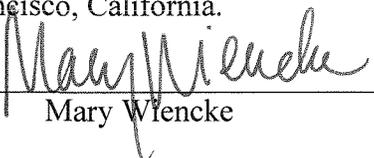
**I. Section 399.25**

Section 399.25 provides the requirements for the California Energy Commission to certify eligible renewable resources and design a system for tracking and verifying the renewable energy and renewable energy credits. Information regarding PacifiCorp's compliance with this requirement is included in Attachment A section 8 of the IRP On-Year Supplement.

**IV. CONCLUSION**

For the foregoing reasons, PacifiCorp respectfully submits this response to the Ruling and its 2013 IRP On-Year Supplement.

Respectfully submitted May 30, 2013, at San Francisco, California.

By   
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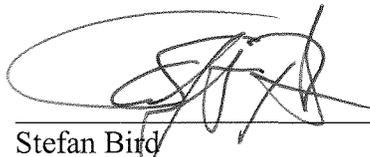
Attorney for PacifiCorp

## VERIFICATION

I am the Senior Vice President of the Commercial and Trading department of the respondent corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 30, 2013 at Portland, Oregon.

A handwritten signature in black ink, appearing to read 'Stefan Bird', written over a horizontal line.

Stefan Bird  
Senior Vice President, Commercial and Trading

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**ATTACHMENT A**  
**PACIFICORP'S 2013 INTEGRATED RESOURCE PLAN**  
**ON-YEAR SUPPLEMENT**

**PACIFICORP'S 2013 INTEGRATED RESOURCE PLAN  
ON-YEAR SUPPLEMENT**

**1. Introduction**

The following sets forth the supplementary material needed to meet the requirements set forth in Pub. Util. Code § 399.17(d) and the *Assigned Commissioner's Ruling Identifying Issues and Schedule of Review for 2013 Renewables Portfolio Standard Procurement Plans Pursuant to Public Utilities Code Section 399.11 Et Seq. and Requesting Comments on A New Proposal*, issued May 10, 2013 (Ruling). This includes the requirements of §§ 399.13, 399.14, and 399.25. To the extent not included below, the required material is found in PacifiCorp's 2013 integrated resource plan (2013 IRP).<sup>8</sup>

**2. Transmission Planning**

The Company is a member of the Northern Tier Transmission Group (NTTG), the planning entity through which the Company demonstrates compliance with the regional planning requirements of FERC Order No. 890. NTTG is currently working on the 2012-2013 Biennial Transmission Plan that provides a regional perspective on the incremental transmission required to efficiently meet the growing load and resource needs of the region. The report is based on a roll-up of each NTTG transmission provider's local transmission plan, and generation assumptions including resources necessary to meet all applicable state renewable portfolio standards (RPS), including California's 33%-by-2020 standard. Associated with this is the ongoing regional and interregional development of the Order No. 1000 Attachment K Tariff filings. PacifiCorp filed its regional compliance filing with the FERC on October 10, 2012 and the interregional filing on May 10, 2013 that outlines interregional coordination of transmission plans and cost allocation.<sup>9</sup>

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<sup>8</sup> The 2013 IRP was filed in this docket on April 30, 2013 and is also available on PacifiCorp's website at: <http://www.pacificorp.com/es/irp.html>

<sup>9</sup> FERC Docket No.s ER13-64 and ER13-1449, respectively.

PacifiCorp's Energy Gateway transmission projects, included in the Company's 2013 IRP, in NTTG's regional transmission plan and in the Western Electricity Coordinating Council's 2022 long-term ten-year transmission plan, play an important role in the Company's commitment to provide safe, reliable, reasonably priced electricity to meet the needs of customers. Energy Gateway's design and extensive footprint provides needed system reliability improvements and supports the development of a diverse range of cost-effective resources required for meeting customers' energy needs, including needs driven by California and other states' RPS requirements.

The first major segment of Energy Gateway – Populus to Terminal – was placed into service in November 2010, and the second major segment – Mona to Oquirrh – was placed into service in May 2013. The federal permit for Sigurd to Red Butte was issued December 7, 2012, the Certificate of Public Convenience and Necessity was issued by the Utah Public Service Commission on March 15, 2013 and construction activities began in April 2013 with a projected completion date of June 2015. Outreach, siting and permitting processes continue for additional transmission segments, including Gateway West and Gateway South. On April 26, 2013, the Bureau of Land Management published the Final Environmental Impact Statement for the Gateway West project in the Federal Register and a record of decision is expected in late 2013. The Energy Gateway projects are necessary to reliably move network resources to network loads as described in PacifiCorp's 2013 IRP. See Chapters 4 and 9 of PacifiCorp's 2013 IRP, for detailed background, status and schedule information for the Energy Gateway expansion plan.

### **3. RPS Portfolio Assessment**

Detailed information regarding PacifiCorp's modeling and resource portfolio assessment process is found in Chapters 5 through 8 of the 2013 IRP. In order to develop the optimal mix of renewable energy PacifiCorp includes a variety of RPS-compliant resources in a capacity expansion optimization model. These include wind, geothermal, biomass (utility scale and distributed facilities), and several solar technologies. Each eligible renewable resource is assigned a capacity planning factor representing the percentage of installed capacity assumed to be available to serve annual peak loads. The capacity expansion optimization model accounts for the capacity planning factor in determining the least-cost portfolio that meets capacity and

energy requirements and other optimization constraints. Incremental transmission and interconnection costs, as well as system integration costs for wind, are factored into the resource characterizations. As a base assumption, the federal renewable production tax credit expires December 31, 2014, although PacifiCorp conducted a sensitivity analysis to determine the resource selection impact of an extension to 2022.

In addition, the Company intends to issue a California only RFP for tradable RECs in 2013 to potentially procure tradable RECs to meet California RPS compliance. Because PacifiCorp is not subject to the RPS portfolio content category limitations, PacifiCorp is not limited with regard to the quantity of tradable RECs that may be used to satisfy PacifiCorp’s compliance obligations.

#### 4. Resource Development Status Update

Table 2 provides a status update on the development schedule of resources reported in the 2011 IRP Off-Year Supplement filed in July 2012, summarizes the status of current projects that were recently executed, are operational, and where PacifiCorp receives the energy and the RECs as well as current contracts that are in development or currently under construction. Currently, all of the projects under contract but not yet generating are between PacifiCorp and qualifying facilities (QFs) under the Public Utility Regulatory Policies Act (PURPA).

**Table 2: QF Contracts**

Technology Type	State	Estimated Annual Production (MWhs)	Estimated Commercial Operation Date	Status
Wind	ID	109,000	December 2012	Contract operational
Wind	ID	238,500	December 2012	Contract operational
Wind	WY	201,000	December 2012	Contract terminated
Wind	WY	293	March 2013	Contract operational
Hydro	ID	3,210	November 2013	Contract executed – project under construction

In addition to the above-listed projects, PacifiCorp plans to procure and use tradable RECs for California RPS compliance as needed, consistent with the conditions set forth in D. 11-01-025. In 2012, PacifiCorp did not issue a RFP to solicit bids for the purchase of tradable RECs to meet

PacifiCorp's California RPS compliance obligations due to absence of near-term need because the Company executed a new QF agreement in April 2012. This QF agreement was for the purchase of energy and RECs from a qualified renewable energy resource through June 2018. Consistent with the 2013 IRP, the Company plans to issue, on a minimum annual basis, RFPs to solicit offers of tradable RECs eligible for California RPS compliance (see Chapter 9 Action Plan p.243).

#### **5. Potential Compliance Delays – Risk of Failure to Build or of Construction Delay**

PacifiCorp does not anticipate significant potential compliance delays. Because the renewable portfolio product content category limitations do not apply to PacifiCorp, PacifiCorp may meet its California RPS compliance shortfall by purchasing tradable RECs. As such, the single most significant potential compliance delay has to do with the viability of the tradable REC market in the western region. PacifiCorp's assessment of the viability of the market has led PacifiCorp to believe that it is unlikely that it will be unable to purchase sufficient tradable RECs to cover its California RPS compliance obligations through at least 2022. Therefore, other potential compliance delays such as transmission availability, etc., associated with purchased or constructed and owned eligible renewable resources are unlikely to have a significant impact on PacifiCorp's net short position.

This is also true with respect to compliance delays caused by failure to build or construction delays. However, these risks are included in PacifiCorp's resource acquisition and procurement decision process. This, in addition to PacifiCorp's previously discussed ability to procure tradable RECs, significantly reduces the risk of failure to build or construction delay and the impact of such to affect PacifiCorp's net short position. If PacifiCorp does not receive sufficient market depth to fulfill its compliance requirements with tradable RECs then PacifiCorp would consider issuing an additional RFP for renewable resources to fulfill its compliance requirement in California.

## **6. Quantitative Analysis and Renewable Net Short Position**

In its 2013 IRP, PacifiCorp analyzed its RPS compliance position for all states with an RPS program, including California. See Chapter 7 (p. 186-187) and Chapter 8 (p.232) of the 2013 IRP. In addition, PacifiCorp assesses its California RPS compliance position or renewable net short position in the context of periodic compliance filings and reports. PacifiCorp submitted its 2011 Preliminary Annual 33% Renewables Portfolio Standard Progress report on December 28, 2012 (December 2012 RPS Progress Report) that included an assessment of PacifiCorp's compliance position. The report was based on PacifiCorp's California retail sales for a 10-year period, 2011 (actual), 2012 through 2020 (forecast). Compliance requirements were assessed based on the Commission established annual percentage targets for each compliance period. PacifiCorp used a deterministic approach in evaluating the renewable resources and contracts that currently are certified by the California Energy Commission (CEC) as eligible for the California RPS program. The contributing renewable generation is based on the Company's generation forecast from each owned facility or the expected generation output from the executed contract and allocated to California consistent with the Company's cost allocation methodology. Additionally, the following assumptions were made in conducting the analysis: 1) any generation from re-contracting or extension of generation was not assumed beyond the useful life of a resource; 2) contracts that have not been executed were not included; 3) generation from any projects not online or any reduction in generation for forecast variability or failure rate were not included. The calculation assesses the amount of surplus/deficit by year and by compliance period.

This methodology, reflected in PacifiCorp's December 2012 RPS Progress Report, identified RPS compliance requirements and "net short" position. In addition, the December 2012 RPS Progress Report shows the incremental need for each compliance period to reach the 33% of retail load compliance requirement. As discussed above, PacifiCorp proposes to meet its near and long-term needs through the purchase of tradable RECs, as needed. As discussed in prior sections of Attachment A, PacifiCorp does not anticipate significant risks associated with its ability to achieve the required compliance targets. PacifiCorp has included this renewable "net short" assessment in its IRP process. PacifiCorp continues to reassess its California compliance need and strategy on an ongoing basis.

## **7. Application to Construct, Own and Operate Eligible Renewable Resource**

Section 399.14 sets forth the requirements for an application by an electrical corporation to construct, own, and operate an eligible renewable energy resource. PacifiCorp is only required to follow these requirements to the extent it intends to allocate one hundred percent of the resource to its California customers. See SMJU decision D08-05-029 Section 3.4.2.1.3. In the event PacifiCorp is required to set forth such an application, it will comply with the requirements set out in § 399.14.

## **8. California Energy Commission Certification**

Section 399.25 directs the California Energy Commission (CEC) to certify eligible renewable resources and design a system for tracking and verifying renewable energy and renewable energy credits. PacifiCorp is using CEC certified renewable resources to meet its RPS requirement for the California RPS program. PacifiCorp participates in the Western Renewable Energy Generation Information System (WREGIS) to track the renewable energy and renewable energy credits that it uses for the California Renewables Portfolio Standard program. PacifiCorp has also submitted to the CEC its RPS Procurement Reports as outlined in the specific CEC Renewable Energy Guidebooks. The CEC has verified PacifiCorp's 2007 RPS Procurement Report and is in the process of verifying the 2008, 2009, and 2010 RPS Procurement Reports.