

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ENERGY REGULATORY COMMISSION

PacifiCorp

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Docket No. ER 20-924-00

**COMMENTS OF THE RENEWABLE ENERGY COALITION AND
COMMUNITY RENEWABLE ENERGY ASSOCIATION**

FEBRUARY 21, 2020 AT 4:15 PM (ET)

EXECUTIVE SUMMARY

Renewable Energy Coalition (“REC”) and the Community Renewable Energy Association (“CREA”) represent members owning and operating existing qualifying facilities (“QFs”) under the Public Utility Regulatory Policies Act (“PURPA”) and members developing new QFs under PURPA in Idaho, Montana, Oregon, Utah, Washington, and Wyoming, as well as, local governments, irrigation districts, and other entities actively involved in advocating on energy policy issues in PacifiCorp’s service territory.

REC and CREA submit these Comments for consideration by the Federal Energy Regulatory Commission (“FERC”) in the matter of PacifiCorp’s interconnection queue reform efforts. PacifiCorp’s proposal will halt development of large QFs in states where the state-jurisdictional interconnections are processed under PacifiCorp’s Open Access Transmission Tariff (“OATT”), and may create an irreconcilable and unworkable conflict in states that maintain serial queue processing. To remedy these concerns, FERC should require PacifiCorp to exempt any state jurisdictional interconnection from demonstrating commercial readiness, to open its Cluster Request Window semiannually rather than annually, and to confirm that states are free to adopt or maintain their own interconnection procedures, including serial queues, for state jurisdictional interconnections like QFs.

Practically speaking, PacifiCorp processes a large number of state-jurisdictional QF interconnections under its OATT, because in some states like Wyoming and Utah, PacifiCorp’s state-approved QF tariff simply provides that interconnections will be processed as provided for in the OATT, and in other states, like Idaho and Washington,

PacifiCorp's state QF tariffs are non-existent or silent on the topic of interconnection procedures. A review of PacifiCorp's Generator Interconnection Queue on its OASIS website confirms that some projects that intend to generate as QFs are processed using PacifiCorp's FERC-approved large generator interconnection procedures ("LGIP" or "LGI Procedures"). Therefore, in light of the fact that many large QF interconnections are, practically speaking, processed under the LGIP, it is important to consider the impacts of the proposed LGIP changes on QFs.

PacifiCorp's proposed reforms, when applied in conjunction with PacifiCorp's state tariffs governing QF power purchase agreement ("PPA") negotiations, will create a catch-22 dilemma, whereby it will be impossible for a QF to comply with both the interconnection and PPA negotiation processes. This is because of the rigid commercial readiness requirements PacifiCorp proposes and their direct conflict with the QF's obligation to meet certain interconnection milestones in the PPA negotiation process, which will have the practical impact of allowing PacifiCorp to refuse to enter into any new PPAs with QFs 20 megawatts ("MWs") and above.

First, when a QF initially submits its application to interconnect, it will likely not be able to demonstrate commercial readiness under PacifiCorp's proposal. A QF could only satisfy commercial readiness with a term sheet or executed PPA, because QFs generally do not bid into requests for proposals ("RFPs"). However, because PacifiCorp's state QF tariffs often require that the QF submit evidence that any necessary interconnection studies have been completed before PacifiCorp will provide a draft PPA, the QF will not be able to obtain a term sheet or executed PPA prior to entering the

interconnection process. At this initial stage, the QF's only option will be to make the \$3,000 per MW deposit in lieu of demonstrating commercial readiness.¹

Second, the QF will also not be able to demonstrate commercial readiness at the Facilities Study Agreement stage in the interconnection queue, because the timelines are too quick to allow the QF to execute a PPA under most of PacifiCorp's current state QF tariffs. Once PacifiCorp's interconnection department provides the QF with its Cluster Study, the QF can then provide that to the power contracting office and request a draft PPA under the state QF tariff. If PacifiCorp considers this sufficient evidence that necessary interconnection agreements have been completed, PacifiCorp is only obligated in Wyoming, for example, to provide a *draft* PPA within 45 calendar days. Meanwhile in the interconnection process, the QF must respond within 30 calendar days with the *enhanced* commercial readiness documentation, which is an *executed* PPA. There is no way for a QF to meet both the requirements of the interconnection process and the requirements of the state QF tariff, because the two create a dilemma from which there is no escape due to mutually dependent conditions: in other words, a catch-22.

While PacifiCorp has slightly different QF tariffs in each state in which it operates, history has shown that many of the elements are the same across states or that PacifiCorp will attempt to revise its various state tariffs for consistency. Therefore, while the dilemma created by PacifiCorp's queue reform proposal may, at this time, affect only most of the states, there is a future possibility that it will affect all of them. FERC should

¹ For an 80 MW QF, the *only* option to even have an interconnection study performed would be to provide a \$240,000 deposit (plus a \$150,000 study deposit), which it should not need to post now and that non-QFs can avoid by obtaining a PPA or otherwise meeting the commercial readiness requirements.

require revisions to PacifiCorp's proposal that apply broadly, including that any state jurisdictional interconnection be exempt from demonstrating commercial readiness at both the initial application stage and at the Facilities Study Agreement stage, and that PacifiCorp open its Cluster Request Window semiannually rather than annually, and FERC should confirm that states are free to use their own interconnection procedures for state jurisdictional interconnections.

IDENTITY OF COMMENTERS

REC is an unincorporated trade association that is comprised of nearly 40 members who own and operate nearly 50 QFs or are attempting to develop new QFs under PURPA in Oregon, Idaho, Washington, Utah, Montana and Wyoming. REC is open to all technology types, and its members include irrigation districts, water and waste management districts, corporations, small utilities, and individuals with an interest in selling renewable energy to utilities – members who, absent PURPA, may have no viable mechanism to develop and sell the output of renewable energy projects.

CREA is an Oregon-based intergovernmental association, formed under Oregon Revised Statutes Sections 190.003 to 190.120. CREA consists of local governments, including several Oregon counties, working with CREA's member organizations, which include irrigation districts, businesses, individuals and non-profit organizations. CREA advocates for policies that will promote successful development and operation of renewable energy facilities in Oregon's rural counties, especially policies encouraging development of community-scale renewable energy facilities.

The contact information for the Commenters is as follows:

Renewable Energy Coalition
Attn: John Lowe
PO Box 25576
Portland, OR 97298
jravenesanmarcos@yahoo.com

Community Renewable Energy
Association c/o Brian Skeahan,
Executive Director PMB 409
18160 Cottonwood
Sunriver, OR 97707
Brian.skeahan@community-
renewables.org

Irion A. Sanger
Marie P. Barlow
Sanger Law, P.C.
1041 SE 58th Place
Portland, OR 97215
Telephone: 503-756-7533
Fax: 503-334-2235
irion@sanger-law.com
marie@sanger-law.com

*Counsel for the
Renewable Energy Coalition and
Community Renewable Energy
Association*

I. DISCUSSION

A. PacifiCorp's Interconnection Queue Reform Impacts State-Jurisdictional PURPA Project Interconnections.

Many states in which PacifiCorp operates simply use the OATT to process state-jurisdictional interconnections, and PacifiCorp's cluster study proposal may create irreconcilable conflicts with the states that have their own serial queue interconnection processes. While "large generators . . . constitute far more of the backlog, . . . all other kinds of projects (projects subject to the SGIP or state interconnection processes) represent 73 requests for 2,741 MW of interconnection service."² PacifiCorp does not require small generators to demonstrate commercial readiness to the same extent as the large generators, but it does not explicitly state how it intends to address state jurisdictional large QF interconnections. Therefore, REC and CREA assume that PacifiCorp intends to require state jurisdictional large generator interconnections to be processed in the same manner as FERC jurisdictional large interconnections.

PacifiCorp noted that, as of October 28, 2019, it had 234 interconnection requests in its queue with 161 being FERC jurisdictional large generators and 73 being small and state jurisdictional.³

² PacifiCorp, Docket No. ER20-924-000, Letter from Karen Kruse, Deputy Gen. Counsel, PacifiCorp, to Kimberly Bose, Sec'y, Fed. Energy Regulatory Comm'n at 10-15 (January 31, 2020) [hereinafter "PacifiCorp Transmittal Letter"].

³ PacifiCorp, Docket No. ER20-924-000, PacifiCorp Exhibit PAC-1: Testimony of Rick Vail at 7:15 [hereinafter "PAC-1/Vail Testimony"].

	Number of Interconnection Requests	Size of Interconnection Requests (MW)
FERC LGIP	161	37,393
All Others	73	2,741
Grand Total	234	40,135

PacifiCorp’s current queue has a total of 225 interconnection requests submitted prior to October 28, 2019, so there appears to be nine that have withdrawn since then. Of these 225, 177 are being processed under the LGI application rules, 14 under the FERC SGI rules, 23 under the Oregon Small Generator Rules, 8 under the Utah Small Generator Rules, and one each under the Oregon Large Generator Rules, the “QFLGI,” and the Washington Small Generator Rules.⁵

	Number of Interconnection Requests
FERC LGIP	177
All Others	
FERC SGIP	14
OGI	23
UGI	8
OLGI	1
QFLGI	1
QGI	1
Total All Others	48
Total	225

Therefore, even if all 9 projects that withdrew were small projects or state jurisdictional, that still leaves at least 16 projects that are state jurisdictional but are being processed

⁴ *Id.*

⁵ PacifiCorp’s OASIS Generation Interconnection Queue as of Feb. 14, 2020 (Attached hereto as Exhibit REC/CREA-1) [hereinafter “Exhibit REC/CREA-1: PacifiCorp Queue”].

under the FERC LGIP.⁶ Of the 177 requests that are being processed under the FERC LGIP, 78 of those are 80 MW or smaller and therefore have the potential to be a QF.⁷ A few of these 80 MW and smaller projects that are earlier in the queue, are being processed under the LGI procedures, and have interconnection studies that have already been issued have specifically noted in the studies that they do not intend to generate as QFs, that they intend to generate as QFs, or that they made the decision to generate as QFs during the interconnection process.⁸ Therefore, this review of PacifiCorp's queue shows that at least some of the state-jurisdictional large QF interconnections are being

⁶ Rick Vail's testimony noted 73 small and state jurisdictional projects in the queue as of October 28, 2019, and 9 projects withdrew (which may or may not all be small/state jurisdictional as it is unclear from OASIS which projects withdrew), meaning there should be a minimum of 64 small and state jurisdictional projects still in the queue (possibly more if some that withdrew were FERC large generators). The queue only reflects 48 that are being processed under the SGIP or state interconnection procedures, which leaves a minimum of 16 that are state jurisdictional but are nevertheless being processed under the FERC LGIP.

⁷ Exhibit REC/CREA-1: PacifiCorp Queue.

⁸ See Exhibit REC/CREA-1: PacifiCorp Queue. For example, Queue No. 739 is not a QF. See PACIFICORP TRANSMISSION, LARGE GENERATOR INTERCONNECTION FACILITIES STUDY REPORT FOR Q0739 at ii (Dec. 26, 2019), available at <https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/Q739FS.pdf>. Queue No. 855 is a QF. See PACIFICORP TRANSMISSION, LARGE GENERATOR INTERCONNECTION FACILITIES STUDY REPORT FOR Q0855 at ii (Dec. 16, 2019), available at <https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/Q855FS.pdf>. Finally, Queue No. 905 became a QF during the interconnection process. Compare PACIFICORP TRANSMISSION, LARGE GENERATOR INTERCONNECTION FEASIBILITY STUDY REPORT FOR Q0 at ii (Nov. 30, 2017), available at <https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/Q905FEAS.pdf> (reporting project is not a QF), with PACIFICORP TRANSMISSION, LARGE GENERATOR INTERCONNECTION SYSTEM IMPACT STUDY REPORT FOR Q0905 at ii (May 10, 2018), available at <https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/Q905SIS.pdf> (reporting project is a QF).

processed under the OATT process and therefore state-jurisdictional interconnections are being impacted by the changes made in this docket.

In Wyoming, for example, PacifiCorp, doing business as Rocky Mountain Power, specifically implements its PURPA state-jurisdictional interconnection process for large QFs by reference to the OATT. Wyoming's rules on PURPA simply require that interconnection costs for QFs be determined pursuant to the utility's tariff.⁹ PacifiCorp's tariff requires that:

For interconnections impacting the Company's Transmission System, the Company shall process the interconnection application through PacifiCorp Transmission Services following the procedures for studying the generation interconnection described in the latest version of the Company's Open Access Transmission Tariff, PacifiCorp FERC Electric Tariff, Volume No. 11 Open Access Transmission Tariff (OATT) on file with the Federal Energy Regulatory Commission.¹⁰

Similarly, in Utah, PacifiCorp's tariff provides that:

For interconnections greater than twenty (20) megawatts, the Company will process the interconnection application through PacifiCorp Transmission Services generally following the procedures for studying the generation interconnection described in the Company's Open Access Transmission Tariff, PacifiCorp FERC Electric Tariff, Fifth Revised Volume No. 11 Pro Forma Open Access Transmission Tariff (OATT), as the same may be changed or updated, on file with the Federal Energy Regulatory Commission (FERC).¹¹

For Washington and Idaho, PacifiCorp does not appear to have a state-jurisdictional interconnection tariff for large QFs, meaning that QF interconnections in

⁹ 23-3 Wyo. Code R. § 35(1) (2019).

¹⁰ ROCKY MOUNTAIN POWER, P.S.C. WYOMING NO. 16, SCHEDULE 38, AVOIDED COST PURCHASES FROM NON-STANDARD QUALIFYING FACILITIES at 38-8 (Oct. 27, 2017) (Attached hereto as Exhibit REC/CREA-2) [hereinafter "Exhibit REC/CREA-2: PacifiCorp Wyoming Tariff"].

¹¹ ROCKY MOUNTAIN POWER, P.S.C.U. NO. 50, SCHEDULE NO. 38, QUALIFYING FACILITY PROCEDURES at 38.10 (Apr. 13, 2018) (Attached hereto as Exhibit REC/CREA-3) [hereinafter "PacifiCorp Utah Tariff"].

these states will likely be subject to the FERC LGIP process by default. Therefore, in Wyoming, Utah, Washington, and Idaho, any large QF that seeks to interconnect to PacifiCorp's system will likely be processed under the newly proposed process if approved.

In Oregon, an irreconcilable conflict in the FERC and state processes may result in the need for the FERC process to be adopted at the state level, impacting Oregon large QFs as well as QFs in other PacifiCorp states. In Oregon, PacifiCorp is required to follow the Oregon large generator interconnection procedures established by the Oregon Public Utility Commission for large QFs.¹² In justifying studying large and small projects in the same clusters, PacifiCorp noted that “small generators are susceptible to the same issues as large generators,”¹³ and that “PacifiCorp believes that processing small generators serially and large generators in clusters would be unworkable and would contribute to the confusions and delays currently being experienced.”¹⁴ Approving PacifiCorp's proposed process could similarly create an unworkable conflict with existing state processes for large generators that require serial queue processing. Therefore, it is important to consider the impact of PacifiCorp's proposed queue reforms on QFs.

¹² *Re Pub. Util. Comm'n of Or. Investigation into Interconnection of PURPA Qualifying Facilities With Nameplate Capacity Larger Than 20 Megawatts to a Pub. Util.'s Transmission or Distribution Sys.*, Docket No. UM 1401, Order No. 10-132 at 10 (Apr. 7, 2010).

¹³ PacifiCorp Transmittal Letter at 15 (quoting PAC-1/Vail Testimony at 27:9-10).

¹⁴ *Id.*

B. The Queue Reform Would Create a Catch-22 for PURPA Projects Navigating Both the Interconnection and PURPA Power Contracting Processes in States Such as Wyoming.

PacifiCorp’s proposed commercial readiness requirement creates a direct conflict with a number of its state QF PPA negotiation tariffs such that it will be impossible for QFs to comply with both. Exhibit REC/CREA-4 provides an illustration of how these two processes collide using PacifiCorp’s currently effective Wyoming tariff governing the QF PPA negotiation process¹⁵ and a timeline of PacifiCorp’s proposed queue reform.¹⁶ As Exhibit REC/CREA-4 illustrates and as explained below, it is impossible to comply with both processes.

1. A QF Cannot Demonstrate Commercial Readiness at the Time of Submitting its Interconnection Application

Under PacifiCorp’s proposal, a project is required to submit proof of commercial readiness at the time it submits its application, which can only occur during the 45-day period from April 1 to mid-May each year.¹⁷ Commercial readiness at this stage includes one of the following:

- a) Executed term sheet (or comparable evidence) related to a contract for sale of (i) the constructed Generating Facility to a load-serving entity or to a commercial, industrial, or other large end-use customer, (ii) the Generating Facility’s energy where the term of sale is not less than five (5) years, or (iii) the Generating Facility’s ancillary services if the Generating Facility is an electric storage resource where the term of sale is not less than five (5) years;
- b) Executed contract binding upon the parties for sale of (i) the constructed Generating Facility to a load-serving entity or to a commercial, industrial, or other large end-use customer, (ii) the Generating Facility’s

¹⁵ Exhibit REC/CREA-2: PacifiCorp Wyoming Tariff at 3-6 (Sheets No. 38-3 to 38-6).

¹⁶ Exhibit REC/CREA-4: QF Power Contracting Process vs. Interconnection Process.

¹⁷ PacifiCorp, Docket No. ER20-924-000, Proposed PacifiCorp Open Access Transmission Tariff §§38.4.1, 39.2.1 [hereinafter “Proposed PacifiCorp OATT”].

energy where the term of sale is not less than five (5) years, or (iii) the Generating Facility's ancillary services if the Generating Facility is an electric storage resource where the term of sale is not less than five (5) years;

- c) Reasonable evidence that the Generating Facility has been selected in a Resource Plan or Resource Solicitation Process by or for a load-serving entity, is being developed by a load-serving entity, or is being developed for purposes of a sale to a commercial, industrial, or other large end-use customer. For a Generating Facility being developed by a load-serving entity: a site-specific purchase order for generating equipment or statement signed by the Interconnection Customer attesting that the facility will be supplied with generating equipment (e.g. turbines) with a manufacturer's blanket purchase agreement; or
- d) A refundable deposit of \$3,000 per MW of generating capacity proposed in the Interconnection Request.¹⁸

At the same time, in multiple state QF PPA negotiation processes, PacifiCorp requires that QFs demonstrate that any necessary interconnection studies have been completed in order to receive a draft PPA.¹⁹ For example, PacifiCorp's Wyoming tariff that is applicable to large QFs provides that a QF may request in writing that the Company prepare a draft PPA and, in connection with such request, shall provide (among other things) "evidence that any necessary interconnection studies have been completed and assurance that the necessary interconnection arrangements are being made in accordance with Part II."²⁰ Further, PacifiCorp encourages QFs to "initiate its request for interconnection as early in the planning process as possible, to ensure that necessary interconnection arrangement proceed in a timely manner on a parallel track with

¹⁸ *Id.* §38.4.1.

¹⁹ Exhibit REC/CREA-2: PacifiCorp Wyoming Tariff at 4 (Sheet No. 38-4); Exhibit REC/CREA-3: PacifiCorp Utah Tariff at 7 (Sheet No. 38.7); Pacific Power, Oregon Non-Standard Avoided Cost Rates at 3 (June 21, 2018) (Attached hereto as Exhibit REC/CREA-5) [hereinafter "Exhibit REC/CREA-5: PacifiCorp Oregon Tariff"].

²⁰ Exhibit REC/CREA-2: PacifiCorp Wyoming Tariff at 4 (Sheet No. 38-4).

negotiation of the power purchase agreement.”²¹ This language directly conflicts with the commercial readiness concept, which contemplates that power purchase arrangements should be made *prior* to applying for interconnection. It creates a catch-22, a dilemma from which there is no escape because of mutually dependent conditions.

Therefore, it will be *impossible* for a large QF facing this dilemma to demonstrate commercial readiness. It will not be able to meet either of the first two commercial readiness options of providing a term sheet or an executed PPA, because the QF cannot get a draft PPA without showing it has completed any interconnection studies. The QF will also not likely meet the third commercial readiness option of demonstrating that it has been selected in an RFP. This is so because, while some QFs may bid into an RFP, most QFs are not large enough to make the costly and time intensive effort to bid into an RFP, and most QFs simply sell to PacifiCorp under a state QF tariff, rather than an RFP.

The fourth and final commercial readiness option of paying a refundable deposit of \$3,000 per MW in lieu of demonstrating commercial readiness, then remains as the only option for a QF. However, this option offers little to no relief to QFs, which are often unable to submit that great of a deposit. For an 80 MW QF, this deposit will be \$240,000. This deposit will be required on top of the \$150,000 study deposit that will be required for an interconnection request of that size.²² This means that the *only* way for an 80 MW QF to obtain an interconnection study that it can use to obtain a PPA is to pay nearly a \$400,000 deposit. Under PacifiCorp’s current interconnection processes (both those administered by the states and by FERC), the entire cost for a large QF to proceed

²¹ *Id.* at 6 (Sheet No. 38-6).

²² PacifiCorp Transmittal Letter at 17; PacifiCorp Proposed OATT § 38.1.

through the interconnection process is around \$170,000 (i.e., a \$10,000 interconnection request deposit, followed by an additional \$10,000 deposit upon executing a Feasibility Study Agreement, and then additional deposits in the amounts of \$50,000 and \$100,000 respectively, at the System Impact Study and Facilities Study phases).

While it is the only option available for a QF, such a significant financial security payment in lieu of demonstrating commercial readiness, is not really an option at all. Therefore, approving PacifiCorp's proposal, as is, will result in the *de facto* requirement all QFs processed under the LGIP must pay financial security. Exhibit REC/CREA-4 assumes that the QF will pay the deposit in lieu of demonstrating commercial readiness and attempts to remedy this dilemma by aligning the moment at which the Cluster Study is complete with the moment at which the QF will request its draft PPA; however, as articulated below, this creates another conflict.

2. A QF Will Also Not Be Able to Meet the *Enhanced* Commercial Readiness Requirements at the Time It Is Required to Execute the Facilities Study Agreement

Even if a QF is able to pay the commercial readiness deposit at the time of its application, the QF will still face an impossible dilemma when it reaches the next stage in PacifiCorp's proposed process at which point it must meet the *enhanced* commercial readiness requirements. After the completion of the Cluster Study, PacifiCorp proposes to provide the interconnection customer with a Facilities Study Agreement, which must be executed within 30 calendar days.²³ At such time, PacifiCorp's proposal requires the interconnection customer to submit documentation showing *enhanced* commercial readiness.²⁴ This means that if the interconnection customer demonstrated commercial

²³ PacifiCorp Transmittal Letter at 26-27; PacifiCorp Proposed OATT § 43.1.

²⁴ PacifiCorp Transmittal Letter at 27; PacifiCorp Proposed OATT § 43.1.

readiness at the earlier stage with either a term sheet or deposit, it will be required to submit another form of commercial readiness, specifically either an RFP selection, an executed PPA, or a financial deposit equal to the full amount of any network upgrades allocated to the QF in the Cluster Study, minus any original deposit.²⁵

First, at this stage in the process, the QF is still subject to PacifiCorp's QF PPA negotiation procedures, such as Wyoming's that require completion of *any necessary interconnection studies* in order to obtain a draft PPA. The Facilities Study, along with the earlier Cluster Study, is also generally going to be *necessary* for interconnection. Therefore, PacifiCorp can effectively prevent a QF from moving forward in either: 1) the PPA negotiation process because it has not provided the necessary interconnection studies; or 2) in the interconnection process because it has not provided an executed PPA proving it is commercially ready.

Second, even if PacifiCorp considers the Cluster Study as sufficient proof to proceed in the PPA negotiation process, PacifiCorp is not obliged in Wyoming to provide a *draft* PPA until after 45 calendar days,²⁶ which is longer than the 30-calendar-day timeframe during which the QF will have to review the cluster study, execute the Facilities Study Agreement, and provide the enhanced commercial readiness documents or deposit. Therefore, even if the QF provides its Cluster Study to PacifiCorp's power

²⁵ PacifiCorp Transmittal Letter at 26-27; PacifiCorp Proposed OATT § 43.1.

²⁶ Exhibit REC/CREA-2: PacifiCorp Wyoming Tariff at 4 (Sheet No. 38-4); *see also* Exhibit REC/CREA-3: PacifiCorp Utah Tariff at 7 (Sheet No. 38.7); ("The Company shall provide the Developer with a proposed power purchase agreement within thirty (30) days."); Exhibit REC/CREA-5: PacifiCorp Oregon Tariff at 3 ("Within 30 days following receipt of all information required pursuant to paragraph 3, the Company shall provide the owner with a draft power purchase agreement").

contracting team and requests a draft PPA on the day that the Cluster Study is provided, it will likely not have its executed PPA (let alone even a draft PPA) in time to provide it to PacifiCorp's interconnection team within the 30-day window. And even if PacifiCorp provides the *draft* PPA more quickly than 45 calendar days, say in 29 days, so that the QF can provide it to the interconnection team, it still will not be sufficient to demonstrate commercial readiness because, at this stage, PacifiCorp is requesting *executed* PPAs as a demonstration of the enhanced commercial readiness.

Even after that 30-calendar-day window, PacifiCorp's Wyoming QF PPA process then allows for up to an additional 45 calendar days once the parties are in full agreement before it will provide an executable PPA,²⁷ and even then the execution of the PPA is *conditioned upon* state commission approval and PacifiCorp "reserves the right to condition execution of the power purchase agreement upon simultaneous execution of an interconnection agreement."²⁸ This conflict is illustrated in Exhibit REC/CREA-4 by the fact that the enhanced commercial readiness requirements will be due in mid-December, yet the QF will not be eligible to receive a draft PPA until early January of the following year. Therefore, assuming there are no negotiations over the PPA, the QF will not receive an executable PPA until mid-February at the earliest. Under this regime, there is

²⁷ Exhibit REC/CREA-2: PacifiCorp Wyoming Tariff at 6 (Sheet No. 38-6); *see also* Exhibit REC/CREA-3: PacifiCorp Utah Tariff at 8 (Sheet No 38.8) (provides for an additional 30-day response deadline to any QF revisions, and a 21-day deadline to complete internal credit, legal and upper management review before executing); Exhibit REC/CREA-5: PacifiCorp Oregon Tariff at 3 ("When both parties are in full agreement as to all terms and conditions of the power purchase agreement, the Company will prepare and forward to the owner a final, executable version of the agreement within 15 business days.").

²⁸ Exhibit REC/CREA-2: PacifiCorp Wyoming Tariff at 6 (Sheet No. 38-6).

no possible route under which a QF can demonstrate commercial readiness in the interconnection process.

The only remaining option is for the QF to make a financial deposit equal to the full amount of any network upgrades allocated to the QF in the Cluster Study, minus any earlier deposit. As described above, many QFs will not be able to make significant upfront payments. Many QFs in the development stages do not have adequate capital to front such significant costs. The costs for network upgrades are often high, and a QF will often not be able to pay for them until later in the process once it has secured its financing. Since this will be the QF's only option to show commercial readiness, it is not appropriate to impose such costs at this stage in the process. One option is no option at all, and this particular option will result in all large QFs simply being required to pay their share of all network upgrade costs upfront.

C. All State-Jurisdictional Interconnections Should be Exempt from Commercial Readiness Requirements

To remedy this catch-22, FERC should require that PacifiCorp amend its proposed process to exempt not only the small interconnection customers but also any state-jurisdictional interconnection customer from the commercial readiness requirement, and provide for more frequent, semiannual studies. PacifiCorp asserts that small and state jurisdictional interconnection customers are not the main problem with its interconnection queue issues, yet PacifiCorp only proposes to exempt small generators from the commercial readiness requirements and not state jurisdictional ones as well.

Specifically:

Under the current queue, large generators (those with an output in excess of 20 MW) constitute far more of the backlog than do small generators. Large generation projects represent 161 requests for over 37,000 MW of interconnection service in the current queue, whereas all other kinds of

projects (*projects subject to the SGIP or state interconnection processes*) represent 73 requests for 2,741 MW of interconnection service. Thus, it is appropriate to apply a gating mechanism (in the form of commercial readiness) to the large generators before they can be included in a cluster study, in the hopes of eliminating this kind of backlog going forward.²⁹

Therefore, if both small projects and projects subject to state jurisdiction processes represent a smaller portion of the problem, then they both should be exempt from the commercial readiness requirements.

D. PacifiCorp Should Do Semiannual Studies

PacifiCorp should perform semiannual studies. FERC has already approved twice annual studies in other queue reform efforts.³⁰ The study process will be the only way in which a QF can obtain an interconnection study, which will be the only way in which a QF can obtain a PPA. If there is only one annual study, then there will be only one period of time in which a QF can obtain a contract with PacifiCorp.

Specifically, REC and CREA recommends that PacifiCorp perform four studies per year, at least for state jurisdictional interconnections. PacifiCorp argues that annual studies are more appropriate because it has a larger system and increased interconnection demand, and also so that it can ensure that the Cluster Studies are complete or near-complete before the next cluster window opens.³¹ However, should PacifiCorp continue to face the same level of interconnection demand as it currently does, there is a high likelihood that interconnection customers will drop out once the Cluster Study results are released. If enough of them do, it will trigger a need to perform a re-study, in which case the cluster study will not likely be complete before the next cluster window opens, and

²⁹ PacifiCorp Transmittal letter at 15-16 (emphasis added).

³⁰ PacifiCorp Transmittal Letter at 23; *see also Pub. Serv. Co. of N.M.*, 136 FERC ¶ 61,231 (2011); *Pub. Serv. Co. of Colo.*, 169 FERC ¶ 61,182 (2019).

³¹ PacifiCorp Transmittal Letter at 23.

PacifiCorp will still face the same dilemma of not having one study complete when the next is set to begin. Therefore, under the currently proposed process, it is inevitable that PacifiCorp will, at some point, need to open its next cluster window before the prior study is complete. This is not a good reason to not have a cluster window, but it is a good reason to put in place a process for addressing the situation when it does arise.

E. FERC Should Confirm that States Can Adopt or Maintain Their Own Interconnection Procedures for State Jurisdictional Facilities

REC and CREA's understanding is that most states will likely simply use PacifiCorp's new generator interconnection procedures that are adopted by FERC. However, REC also understands that there is nothing in PacifiCorp's proposal that would preclude a state from maintaining its serial queue procedures or adopting its own processes (serial, cluster or another approach). REC and CREA request that PacifiCorp confirm this assumption when it responds to REC and CREA's filing and that FERC officially confirm this assumption in its order regarding PacifiCorp's filing.

II. CONCLUSION

For the reasons discussed above, FERC should exempt all QFs from commercial readiness requirements, require semiannual cluster windows, and confirm that states can maintain or adopt their own interconnection procedures for state jurisdictional facilities.

Dated: February 21, 2020

/s/ Irion A. Sanger
Irion A. Sanger
Marie P. Barlow
Sanger Law, P.C.
1041 SE 58th Place
Portland, OR 97215
Telephone: 503-756-7533
Fax: 503-334-2235

irion@sanger-law.com
marie@sanger-law.com

*Counsel for the Renewable
Energy Coalition and Community
Renewable Energy Association*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Portland, OR this 21st day of February, 2020.

/s/ Irion A. Sanger
Irion A. Sanger
Sanger Law, P.C.
1041 SE 58th Place
Portland, OR 97215
Telephone: 503-756-7533
Fax: 503-334-2235
irion@sanger-law.com

Exhibit REC/CREA-1

PacifiCorp's OASIS Generation Interconnection Queue as of Feb. 14, 2020

As of: 2/14/20 Active: PacifiCorp Generation Interconnection Queue

Exhibit REC/CREA-1

Interconnect Request Information										Max MW Output		Location of Generating Facility			Location of Interconnection	Customer Requested Commercial Operations	Type	Reports				
Q#	Request Date	Request Status	Company Name	Service Type	Application Rules	S	W	County	ST	Region	Point of Interconnection			Feasibility Study / Fast Track	System Impact Study	Facilities Study	Optional Study	Schedule Deviation				
718	11/6/15	In Progress		0 ER	LGI	400	400	Lake	OR	PACW	Burns-Summer Lake transmission line		12/1/19	Wind	Available	Available	Available		More Info			
723	12/10/15	In Progress		0 NR/ER	LGI	750	750	Custer	MT	PACE	Colstrip substation		9/1/18	Wind	Available							
739	4/29/16	In Progress		0 ER	LGI	59	59	Crook	OR	PACW	Baldwin Road substation		8/1/18	Solar	Available	Available	Available		More Info			
783	8/3/16	In Progress		0 ER	LGI	30	30	Natrona	WY	PACE	Bar Nunn substation		6/30/20	Solar	Available	Available	Available		More Info			
789	8/8/16	In Progress		0 ER	LGI	75	75	Fremont	WY	PACE	Riverton-Thermopolis transmission line		9/30/19	Solar	Available	Available	Available		More Info			
801	9/20/16	In Progress		0 ER	LGI	80	80	Natrona	WY	PACE	Bar Nunn substation		6/30/19	Solar	Available	Available	Available		More Info			
802	9/20/16	In Progress		0 ER	LGI	50	50	Natrona	WY	PACE	Bar Nunn substation		6/30/19	Solar	Available	Available	Available		More Info			
805	9/30/16	In Progress		0 ER	LGI	95	95	Kane	UT	PACE	Sigurd-Glen Canyon transmission line		12/19/19	Solar	Available	Available	Available		More Info			
807	9/30/16	In Progress		0 ER	LGI	76	76	Carbon	WY	PACE	Standpipe substation		8/31/19	Wind	Available	Available	Available		More Info			
835	12/5/16	In Progress		0 ER	LGI	190	190	Carbon	WY	PACE	Footo Creek substation		10/1/20	Wind	Available	Available	Available		More Info			
836	12/5/16	In Progress		0 ER	LGI	400	400	Carbon	WY	PACE	Aeolus substation		10/1/23	Wind	Available	Available	Available		More Info			
837	12/5/16	In Progress		0 ER	LGI	450	450	Meagher	MT	PACE	Colstrip transmission line		12/30/20	Energy Storage								
838	12/8/16	In Progress		0 NR	LGI	525	525	Tooele	UT	PACE	Clover-Quirrh transmission line		12/1/18	Solar					More Info			
839	12/8/16	In Progress		0 NR	LGI	525	525	Utah	UT	PACE	Clover-Quirrh transmission line		12/1/18	Solar					More Info			
848	2/2/17	In Progress		0 NR/ER	LGI	300	300	Yellowstone	MT	PACE	Broadview substation (Colstrip transmission line)		12/1/20	Solar								
854	3/14/17	In Progress		0 NR/ER	LGI	190	190	Kane	UT	PACE	Sigurd-Glen Canyon transmission line		12/31/20	Solar					More Info			
855	3/17/17	In Progress		0 NR	LGI	80	80	Converse	WY	PACE	Amasa substation		12/31/19	Wind	Available	Available	Available		More Info			
858	4/5/17	In Progress	PacifiCorp Energy Supply Management	ER	LGI	26	26	Carbon	WY	PACE	Shirley Basin		12/1/20	Wind	Available				More Info			
859	4/5/17	In Progress	PacifiCorp Energy Supply Management	ER	LGI	43	43	Converse	WY	PACE	Windstar substation		7/1/19	Wind	Available	Available			More Info			
860	4/5/17	In Progress	PacifiCorp Energy Supply Management	NR/ER	LGI	30	30	Carbon	WY	PACE	Footo Creek substation		11/1/19	Wind					More Info			
861	4/5/17	In Progress	PacifiCorp Energy Supply Management	NR/ER	LGI	28	28	Carbon	WY	PACE	Freezeout substation		5/1/19	Wind					More Info			
862	4/6/17	In Progress		0 ER	LGI	45	45	Box Elder	UT	PACE	Lampo substation		6/30/19	Solar	Available	Available			More Info			
863	4/10/17	In Progress	PacifiCorp Energy Supply Management	NR	LGI	110	110	Carbon	WY	PACE	Footo Creek substation		11/1/20	Wind	Available				More Info			
864	4/12/17	In Progress		0 NR	LGI	78	78	Iron	UT	PACE	Three Peaks substation		6/1/20	Solar					More Info			
865	4/12/17	In Progress		0 NR	LGI	78	78	Iron	UT	PACE	West Cedar substation		6/1/20	Solar					More Info			
871	5/5/17	In Progress		0 NR/ER	LGI	100	100	Juab	UT	PACE	Mona substation		12/1/20	Solar					More Info			
872	5/5/17	In Progress		0 NR/ER	LGI	500	500	Carbon	WY	PACE	Aeolus substation		12/31/20	Wind					More Info			
875	5/11/17	In Progress		0 ER	SGI	20	20	Fremont	WY	PACE	Circuit WCM342 out of WAPA Copper Mountain substation		12/1/18	Solar								
876	5/12/17	In Progress	PacifiCorp Energy Supply Management	NR/ER	LGI	22	22	Carbon	WY	PACE	Footo Creek substation		9/1/19	Wind					More Info			
877	5/15/17	In Progress		0 ER	LGI	480	480	Klamath	OR	PACW	Malin-Snow Goose transmission line		5/1/20	Solar	Available	Available			More Info			
882	5/22/17	In Progress		0 NR	SGI	15	15	Carbon	WY	PACE	Freezeout substation OR Aeolus substation		11/1/20	Wind								
898	6/23/17	In Progress		0 NR/ER	LGI	202	202	Juab	UT	PACE	Clover substation		12/1/20	Solar					More Info			
905	7/12/17	In Progress		0 NR	LGI	50	50	Klamath	OR	PACW	Copco 2 - Westside Tap to Klamath Falls line (Line 18)		12/1/19	Solar	Available	Available			More Info			
906	7/12/17	In Progress		0 ER	LGI	80	80	Klamath	OR	PACW	Klamath Falls-Lone Pine transmission line		12/1/19	Solar	Available	Available	Available		More Info			
907	7/12/17	In Progress		0 ER	LGI	80	80	Klamath	OR	PACW	Klamath Falls-Lone Pine transmission line		12/1/19	Solar	Available	Available	Available		More Info			
915	7/28/17	In Progress		0 ER	LGI	80	80	Klamath	OR	PACW	Captain Jack - Meridian transmission line		12/1/19	Solar	Available	Available			More Info			
916	7/28/17	In Progress		0 ER	LGI	80	80	Klamath	OR	PACW	Captain Jack - Meridian transmission line		12/1/19	Solar	Available	Available			More Info			
917	7/28/17	In Progress		0 ER	LGI	80	80	Klamath	OR	PACW	Captain Jack - Meridian transmission line		12/1/19	Solar	Available	Available			More Info			
920	8/1/17	In Progress		0 NR/ER	LGI	630	630	Albany	WY	PACE	Aeolus substation		6/15/20	Wind					More Info			
925	8/9/17	In Progress		0 NR/ER	LGI	300	300	Platte	WY	PACE	Aeolus substation		12/31/20	Wind					More Info			
926	8/9/17	In Progress		0 NR/ER	LGI	300	300	Platte	WY	PACE	Aeolus substation		12/31/20	Wind					More Info			
927	8/9/17	In Progress		0 NR/ER	LGI	600	600	Platte	WY	PACE	Aeolus substation		12/31/20	Wind					More Info			
928	8/9/17	In Progress		0 NR/ER	LGI	300	300	Platte	WY	PACE	Footo Creek substation		12/31/20	Wind					More Info			
929	8/9/17	In Progress		0 NR/ER	LGI	300	300	Platte	WY	PACE	Footo Creek substation		12/31/20	Wind					More Info			
933	8/9/17	In Progress		0 NR/ER	LGI	300	300	Albany	WY	PACE	Windstar substation		12/31/20	Wind					More Info			
934	8/9/17	In Progress		0 NR/ER	LGI	300	300	Albany	WY	PACE	Windstar substation		12/31/20	Wind					More Info			
935	8/9/17	In Progress		0 NR/ER	LGI	300	300	Albany	WY	PACE	Shirley Basin substation		12/31/20	Wind					More Info			
936	8/9/17	In Progress		0 NR/ER	LGI	300	300	Albany	WY	PACE	Shirley Basin substation		12/31/20	Wind					More Info			
937	8/9/17	In Progress		0 NR/ER	LGI	250	250	Big Horn	MT	PACE	Yellowtail substation		12/31/20	Wind					More Info			

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938	8/21/17	In Progress		0	NR	LGI	40	40	Beaver	UT	PACE	Sulpherdale-Tushar transmission line	9/30/18	Solar					More info
940	8/24/17	In Progress		0	NR/ER	LGI	576	576	Carbon	WY	PACE	Shirley Basin substation	1/12/20	Wind					More info
947	9/19/17	In Progress		0	NR/ER	LGI	248	248	Carbon	WY	PACE	Shirley Basin substation	1/12/20	Wind					More info
948	9/19/17	In Progress		0	NR/ER	LGI	248	248	Carbon	WY	PACE	Shirley Basin substation OR Aeolus substation	1/12/20	Wind					More info
949	9/19/17	In Progress		0	NR/ER	LGI	248	248	Carbon	WY	PACE	Shirley Basin substation OR Heward substation	1/12/20	Wind					More info
950	9/20/17	In Progress		0	ER	LGI	50	50	Natrona	WY	PACE	Sheridan-Yellowtail-Casper transmission line	12/1/19	Solar					More info
951	9/20/17	In Progress		0	ER	LGI	80	80	Fremont	WY	PACE	Mustang - Spence transmission line	12/1/19	Solar					More info
953	9/27/17	In Progress		0	NR	LGI	100	100	Yakima	WA	PAQW	Union Gap - Midway transmission line	1/1/20	Solar	Available				More info
966	10/20/17	In Progress		0	NR	UGI	20	20	Juab	UT	PACE	Nebo-Vickers-Scipio line	7/31/18	Solar					More info
968	10/30/17	In Progress		0	NR/ER	LGI	59	59	Crook	OR	PACW	Houston Lake substation	8/31/19	Solar					More info
971	11/7/17	In Progress		0	NR	OGI	3	3	Klamath	OR	PACW	Turkey Hill substation	12/15/19	Solar	Available	Available			
974	11/15/17	In Progress		0	NR	LGI	80	80	Lincoln	WY	PACE	Naughton-Treasureton transmission line	12/31/19	Solar					More info
975	11/16/17	In Progress		0	NR/ER	LGI	101	101	Juab	UT	PACE	Clover substation	12/1/20	Solar					More info
976	11/20/17	In Progress		0	NR/ER	LGI	525	525	Utah	UT	PACE	Camp Williams - Mona #4 OR Camp Williams - Mona #2	12/1/20	Solar					More info
978	11/20/17	In Progress		0	NR/ER	LGI	525	525	Box Elder	UT	PACE	Ben Lomond-Populus #2 line	12/1/20	Solar					More info
979	11/21/17	In Progress		0	NR/ER	LGI	160	160	Utah	UT	PACE	Camp Williams-Mona #4 line OR Mona substation	12/1/21	Solar					More info
980	11/27/17	In Progress		0	NR/ER	LGI	200	200	Box Elder	UT	PACE	Populus-Ben Lomond #1 line OR Populus-Ben Lomond #2 line	9/30/20	Solar					More info
981	11/27/17	In Progress		0	NR/ER	LGI	100	100	Box Elder	UT	PACE	Populus-Ben Lomond #1 line OR Populus-Ben Lomond #2 line	9/30/20	Solar					More info
982	11/29/17	In Progress		0	NR/ER	LGI	300	300	Utah	UT	PACE	Camp Williams-Mona #4 line OR Camp Williams-Mona #3 line	11/30/20	Solar					More info
985	11/30/17	In Progress		0	NR/ER	LGI	300	300	Utah	UT	PACE	Camp Williams-Mona #4 line	12/1/20	Solar					More info
986	12/8/17	In Progress		0	NR/ER	LGI	600	600	Beaver	UT	PACE	Red Butte-Sigurd #2 line	12/31/20	Solar					More info
993	12/18/17	In Progress		0	NR/ER	LGI	75	75	Weber	UT	PACE	Ben Lomond-Western Zirconium line	10/31/20	Solar					More info
994	12/21/17	In Progress		0	NR	LGI	40	40	Converse	WY	PACE	Latigo substation	12/31/19	Solar					More info
995	12/21/17	In Progress		0	NR	LGI	40	40	Converse	WY	PACE	Latigo substation	12/31/19	Solar					More info
997	12/27/17	In Progress		0	NR/ER	LGI	300	300	Iron	UT	PACE	Sigurd-Red Butte #1 OR Sigurd-Red Butte #2 line	12/30/20	Solar					More info
999	1/8/18	In Progress		0	NR	LGI	50	50	Tooele	UT	PACE	Tooele-Horseshoe line	12/31/19	Solar	Available	Available			More info
1000	1/15/18	In Progress		0	NR/ER	LGI	120	120	Weber	UT	PACE	Ben Lomond-Western Zirconium line	10/31/20	Solar					More info
1004	2/12/18	In Progress		0	ER	SGI	25	25	Box Elder	UT	PACE	Thiokol-Plant 78 line	12/31/19	Solar					
1005	2/15/18	In Progress		0	NR/ER	LGI	50	50	Summit	UT	PACE	Evanston-Anschutz line	10/31/20	Wind					More info
1006	3/6/18	In Progress		0	NR/ER	LGI	60	60	Carbon	UT	PACE	Mathington substation	12/1/19	Solar					
1007	3/6/18	In Progress		0	ER	OGI	1	1	Wallowa	OR	PACW	Circuit 5W28 out of Wallowa substation	1/1/19	Solar		Available			
1008	3/8/18	In Progress		0	NR/ER	LGI	100	100	Yakima	WA	PACW	Union Gap - Midway line	12/1/20	Solar					
1009	3/16/18	In Progress		0	NR/ER	LGI	32	32	Tooele	UT	PACE	Tooele-Mercur line	12/31/19	Solar	Available				
1010	3/16/18	In Progress		0	NR	LGI	33	33	Box Elder	UT	PACE	Thiokol-Honeyville line	8/1/19	Solar					
1013	3/27/18	In Progress		0	NR	LGI	80	80	Converse	WY	PACE	Latigo substation	6/30/20	Solar					
1014	3/29/18	In Progress		0	NR/ER	LGI	100	100	Carbon	WY	PACE	Shirley Basin substation	12/1/20	Wind					
1015	3/29/18	In Progress		0	NR/ER	LGI	501	501	Carbon	WY	PACE	Aeolus substation	12/1/20	Wind					
1016	3/29/18	In Progress		0	NR/ER	LGI	501	501	Carbon	WY	PACE	Aeolus substation	12/1/20	Wind					
1019	4/26/18	In Progress		0	NR	OLGI	80	80	Linn	OR	PACW	Fry substation	12/1/21	Solar	Available				
1023	5/10/18	In Progress		0	NR/ER	LGI	50	50	Tooele	UT	PACE	Tooele Depot substation	12/31/20	Solar					
1024	5/10/18	In Progress		0	NR/ER	LGI	100	100	Cache	UT	PACE	Bridgerland-Green Canyon transmission line	12/31/20	Solar					
1027	5/17/18	In Progress		0	NR/ER	LGI	251	251	Tooele	UT	PACE	Limber substation	12/1/22	Solar					
1028	5/17/18	In Progress		0	NR/ER	LGI	251	251	Tooele	UT	PACE	Limber substation	12/1/22	Solar					
1029	5/29/18	In Progress		0	NR/ER	LGI	400	400	Lake	OR	PACW	Hemmingway-Summer Lake transmission line	12/1/21	Solar	Available				
1031	5/30/18	In Progress		0	NR/ER	LGI	80	80	Harney	OR	PACW	Hemmingway-Summer Lake transmission line	12/1/20	Solar					
1032	5/30/18	In Progress		0	NR/ER	LGI	80	80	Harney	OR	PACW	Hemmingway-Summer Lake transmission line	12/1/20	Solar					
1033	5/30/18	In Progress		0	NR/ER	LGI	80	80	Harney	OR	PACW	Hemmingway-Summer Lake transmission line	12/1/20	Solar					
1034	6/5/18	In Progress		0	NR/ER	LGI	60	60	Lake	OR	PACW	Alturas-Mile Hi transmission line	11/30/20	Solar					
1035	6/8/18	In Progress		0	NR/ER	LGI	100	100	Utah	UT	PACE	Camp Williams - Mona transmission line	12/1/21	Solar					
1036	6/8/18	In Progress		0	NR/ER	LGI	100	100	Utah	UT	PACE	Camp Williams - Mona transmission line	12/15/21	Solar					
1037	6/8/18	In Progress	PacifiCorp Energy Supply Management	0	NR/ER	LGI	35	35	Iron	UT	PACE	West Cedar substation	11/23/21	Solar					
1038	6/11/18	In Progress		0	NR/ER	LGI	200	200	Utah	UT	PACE	Camp Williams - Mona transmission line	12/15/21	Battery					
1039	6/11/18	In Progress		0	NR/ER	LGI	30	30	Cache	UT	PACE	Bridgerland-Green Canyon transmission line	12/31/20	Solar					
1043	6/26/18	In Progress		0	ER	OGI	3	3	Klamath	OR	PACW	Circuit 5L58 out of Henley substation	7/1/20	Solar	Available				
1045	7/5/18	In Progress		0	NR	OGI	3	3	Umatilla	OR	PACW	Circuit 5W406 out of Pilot Rock substation	12/31/19	Solar					

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1047	7/16/18	In Progress	0	NR/ER	LGI	50	50	Utah	UT	PACE	Santaquin-Nebo #2 Burgin Tap transmission line	6/1/20	Solar						
1048	7/16/18	In Progress	0	NR/ER	LGI	50	50	Utah	UT	PACE	Santaquin-Nebo #2 Burgin Tap transmission line	6/1/20	Solar						
1049	7/16/18	In Progress	0	NR/ER	LGI	300	300	Utah	UT	PACE	Camp Williams-Four Corners transmission line	12/1/20	Solar						
1050	7/16/18	In Progress	0	NR/ER	LGI	300	300	Utah	UT	PACE	Camp Williams-Mona #1 OR #2 transmission line	12/1/20	Solar						
1051	7/24/18	In Progress	0	NR/ER	LGI	100	100	Utah	UT	PACE	Camp Williams - Mona transmission line	12/15/21	Solar						
1052	7/24/18	In Progress	0	NR/ER	LGI	100	100	Utah	UT	PACE	Camp Williams - Mona transmission line	12/15/21	Solar						
1053	7/26/18	In Progress	0	NR/ER	LGI	50	50	Millard	UT	PACE	Pavant-Delta transmission line OR McCormick substation	11/30/20	Solar						
1054	7/26/18	In Progress	0	NR/ER	LGI	30	30	Millard	UT	PACE	Delta - McCormick transmission line OR McCormick substation	11/30/20	Solar						
1055	7/27/18	In Progress	0	NR	SGI	4	4	Shasta	CA	PACW	Castella substation	12/31/18	Hydro						
1056	8/8/18	In Progress	0	NR/ER	LGI	100	100	Juab	UT	PACE	Ashgrove-Clover transmission line	12/31/21	Solar						
1057	8/14/18	In Progress	0	ER	OGI	3	3	Klamath	OR	PACW	Circuit 5L8 out of Sprague River substation	9/1/19	Solar						
1058	8/14/18	In Progress	0	ER	OGI	3	3	Klamath	OR	PACW	Circuit 4L16 out of Casebeer	9/1/19	Solar						
1059	8/14/18	In Progress	0	ER	OGI	3	3	Klamath	OR	PACW	Circuit 5L14 out of the Bly substation	9/1/19	Solar						
1060	8/14/18	In Progress	0	ER	OGI	3	3	Klamath	OR	PACW	Circuit 5L8 out of the Sprague River substation	9/1/19	Solar						
1062	8/15/18	In Progress	0	NR/ER	LGI	240	240	Klamath	OR	PACW	Klamath Falls-Malin transmission line	12/31/22	Solar						
1063	8/16/18	In Progress	0	ER	SGI	5	5	Siskiyou	CA	PACW	McCloud substation	9/30/19	Solar						
1065	9/13/18	In Progress	0	NR	LGI	600	600	Butte	ID	PACE	Antelope substation	9/1/26	Nuclear						
1066	9/17/18	In Progress	0	ER	LGI	750	750	Prairie	MT	PACE	Colstrip substation	9/1/21	Wind						
1067	9/17/18	In Progress	0	ER	LGI	750	750	Prairie	MT	PACE	Colstrip substation	9/1/21	Wind						
1068	9/17/18	In Progress	0	ER	WGI	3	3	Yakima	WA	PACW	White Swan substation OR Circuit 5Y690 out of White Swan substation	12/30/19	Solar						
1069	9/17/18	In Progress	0	NR	SGI	5	5	Yakima	WA	PACW	White Swan substation OR Circuit 5Y690 out of White Swan substation	12/30/19	Solar						
1070	9/21/18	In Progress	0	NR/ER	LGI	400	400	Utah	UT	PACE	Camp Williams - Mona #1 transmission line OR Camp Williams-Mona #4 transmission line	12/31/21	Solar						
1071	10/5/18	In Progress	0	NR	SGI	3	3	Yakima	WA	PACW	Circuit 5Y312 out of Sunnyside substation	12/31/20	Solar						
1072	10/5/18	In Progress	0	NR	SGI	2	2	Yakima	WA	PACW	Circuit 5Y312 out of Sunnyside substation	12/31/20	Solar						
1073	10/8/18	In Progress	0	NR/ER	LGI	160	160	Juab	UT	PACE	Mona substation	12/1/21	Solar						
1074	10/8/18	In Progress	0	NR/ER	LGI	160	160	Utah	UT	PACE	Camp Williams-Mona #4 transmission line	12/1/21	Solar						
1076	10/15/18	In Progress	0	NR/ER	LGI	58	58	Lincoln	WY	PACE	Naughton-Treasurton transmission line	12/1/20	Solar						
1078	10/23/18	In Progress	0	NR	LGI	80	80	Lincoln	WY	PACE	Naughton - Treasurton transmission line	12/31/21	Solar						
1079	10/24/18	In Progress	0	NR	LGI	26	26	Sweetwater	WY	PACE	Existing connection to Circuit (either 9H910, 9H912 or 9H914) out of Raven substation	5/1/19	Natural Gas						
1080	10/29/18	In Progress	0	NR/ER	LGI	75	75	Lincoln	WY	PACE	Chappel Creek substation	12/1/22	Solar						
1081	10/29/18	In Progress	0	NR/ER	LGI	75	75	Lincoln	WY	PACE	Chappel Creek substation	12/1/22	Solar						
1083	11/5/18	In Progress	0	NR	LGI	80	80	Rich	UT	PACE	Birch Creek-Railroad transmission	12/31/21	Solar						
1084	11/5/18	In Progress	0	NR	SGI	3	3	Yakima	WA	PACW	Circuit 5Y441 out of Hopland substation	12/31/20	Solar						
1085	11/13/18	In Progress	0	NR/ER	LGI	80	80	Sublette	WY	PACE	Chimney Butte substation	11/30/20	Solar						
1086	11/14/18	In Progress	0	ER	LGI	80	80	Tooele	UT	PACE	Homestead Knoll substation	12/31/21	Solar						
1087	11/26/18	In Progress	0	NR/ER	LGI	50	50	Lake	OR	PACW	Alturas-Mile H transmission line	12/31/20	Solar						
1092	12/6/18	In Progress	0	NR/ER	LGI	200	200	Millard	UT	PACE	Pavant substation	12/31/20	Solar						
1093	12/6/18	In Progress	0	NR/ER	LGI	600	600	Crook	OR	PACW	Corral substation OR Corral-Ochoco transmission line	5/30/21	Solar & Battery Storage						
1094	12/13/18	In Progress	0	NR	LGI	80	80	Rich	UT	PACE	Birch Creek-Railroad transmission line	12/31/22	Solar & Battery Storage						
1095	12/13/18	In Progress	0	NR	LGI	50	50	Sweetwater	WY	PACE	Raven substation	12/31/22	Solar & Battery Storage						
1096	12/28/18	In Progress	0	ER	SGI	4	4	Box Elder	UT	PACE	Outler-El Monte Vulcraft Tap transmission line	2/1/19	Solar						
1097	1/9/19	In Progress	0	NR	OGI	3	3	Polk	OR	PACW	Circuit 4M22 out of Independence substation	4/15/20	Solar						
1098	1/9/19	In Progress	0	NR	OGI	3	3	Polk	OR	PACW	Circuit 4M22 out of Independence substation	4/15/20	Solar						
1099	1/9/19	In Progress	0	ER	OGI	3	3	Jackson	OR	PACW	Circuit 5R239 out of Talent substation	4/15/20	Solar						
1100	1/15/19	In Progress	0	NR/ER	LGI	250	250	Emery	UT	PACE	Camp Williams-Four Corners transmission line	12/31/21	Solar & Battery Storage						
1101	1/15/19	In Progress	0	NR/ER	LGI	75	75	Millard	UT	PACE	Black Rock substation	12/31/21	Solar & Battery Storage						
1102	1/15/19	In Progress	0	NR/ER	LGI	75	75	San Juan	UT	PACE	Abajo substation	12/31/21	Solar & Battery Storage						
1103	1/16/19	In Progress	0	NR	LGI	30	30	Iron	UT	PACE	West Cedar-Red Butte transmission line	7/31/22	Solar						
1104	1/16/19	In Progress	0	NR	OGI	3	3	Josephine	OR	PACW	Circuit 5R52 out of Cave Junction substation	4/15/20	Solar						
1105	1/31/19	In Progress	0	ER	OGI	3	3	Klamath	OR	PACW	Circuit 5L116 out of Texum substation	11/1/20	Solar						
1106	1/31/19	In Progress	0	NR/ER	LGI	320	320	Sweetwater	WY	PACE	Jim Bridger substation	11/1/23	Solar						
1108	1/31/19	In Progress	0	NR/ER	LGI	320	320	Sweetwater	WY	PACE	Rock Springs substation	11/1/23	Solar						
1109	1/31/19	In Progress	0	NR/ER	LGI	320	320	Sweetwater	WY	PACE	West Vaco substation	11/1/23	Solar						
1110	1/31/19	In Progress	0	NR/ER	LGI	320	320	Sweetwater	WY	PACE	Jim Bridger substation	11/1/28	Solar						
1111	2/6/19	In Progress	0	NR/ER	LGI	60	60	Emery	UT	PACE	Emery substation or Blackhawk-Ferron 69 kV line	12/31/21	Solar & Battery Storage						

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1112	2/6/19	In Progress	0	NR/ER	LGI	60	60	Emery	UT	PACE	Emery substation or Blackhawk-Ferron 138 kV line	12/31/21	Solar & Battery Storage				
1113	2/15/19	In Progress	0	ER	SGI	3	3	Emery	UT	PACE	Riverdale-Farmington B transmission line (Tap to Hill AFB) at 138 kV	1/31/19	Solar	Available			
1115	2/21/19	In Progress	0	NR/ER	LGI	600	600	Wheatland	MT	PACE	Proposed Gordon Butte substation	12/31/21	Wind				
1116	2/25/19	In Progress	0	NR	LGI	50	50	Uinta	WY	PACE	Croydon – Railroad transmission line	12/31/22	Solar & Battery Storage				
1117	2/26/19	In Progress	0	NR	LGI	90	90	Salt Lake	UT	PACE	Terminal-Prison transmission line	12/31/21	Solar & Battery Storage				
1118	3/1/19	In Progress	0	NR	LGI	350	350	Moffat	CO	PACE	Aeolus-Clover transmission line	3/12/23	Solar & Battery Storage				
1120	3/11/19	In Progress	0	NR	OGI	3	3	Jackson	OR	PACW	Circuit 5R110 out of the Vilas Road substation	7/15/20	Solar				
1121	3/20/19	In Progress	0	ER	OGI	0	0	Wallowa	OR	PACW	Circuit 5W26 out of the Enterprise substation	10/31/19	Solar				
1122	3/27/19	In Progress	0	NR/ER	LGI	300	300	Meagher	MT	PACW	Costrup transmission line	10/31/22	Wind				
1123	3/29/19	In Progress	0	NR	UGI	3	3	Box Elder	UT	PACE	Circuit SNO12 out of Snowville substation	12/31/21	Solar				
1124	4/8/19	In Progress	0	NR	OGI	0	0	Deschutes	OR	PACW	Circuit 5D128 out of Hunters Circle substation	12/31/19	Solar				
1125	4/8/19	In Progress	0	NR	OGI	0	0	Deschutes	OR	PACW	Circuit 5D128 out of Hunters Circle substation	12/31/19	Solar				
1126	4/8/19	In Progress	0	NR	OGI	8	8	Klamath	OR	PACW	Klamath Falls-Fishhole transmission line	6/1/20	Geothermal				
1127	4/8/19	In Progress	0	NR	LGI	30	30	Uinta	WY	PACE	Croydon – Railroad transmission line	12/31/22	Solar & Battery Storage				
1129	4/11/19	In Progress	0	NR	LGI	78	78	Millard	UT	PACE	Pavant – Sigurd transmission line	9/30/22	Solar				
1130	4/19/19	In Progress	0	NR/ER	LGI	120	120	Iron	UT	PACE	West Cedar substation	9/1/22	Solar				
1131	4/26/19	In Progress	0	NR/ER	LGI	200	200	Carbon	WY	PACE	Aeolus substation	12/1/22	Solar				
1132	4/30/19	In Progress	0	NR	UGI	3	3	Box Elder	UT	PACE	Circuit BSH11 out of Bush substation	12/31/21	Solar				
1133	5/7/19	In Progress	0	NR/ER	LGI	80	80	Klamath	OR	PACW	Klamath Falls-Yamsay transmission line	12/1/22	Solar				
1134	5/7/19	In Progress	0	NR/ER	LGI	120	120	Klamath	OR	PACW	Klamath Falls-Yamsay transmission line	12/1/22	Solar				
1135	5/7/19	In Progress	0	NR/ER	LGI	80	80	Klamath	OR	PACW	Chiloquin-Mile Hi transmission line	12/1/22	Solar				
1140	5/8/19	In Progress	0	ER	UGI	5	5	Salt Lake	UT	PACE	Circuit QRY15 out of Quarry substation	4/2020 / 10/20	Solar				
1141	6/14/19	In Progress	0	NR/ER	LGI	600	600	Carter	MT	PACE	Colstrip substation	12/1/22	Wind				
1142	6/14/19	In Progress	0	NR/ER	LGI	400	400	Carter	MT	PACE	Colstrip substation	12/1/22	Wind				
1143	6/14/19	In Progress	0	NR	LGI	45	45	Bonneville	ID	PACE	Goshen-Rgby transmission line or Goshen substation	10/21/21	Solar				
1144	6/14/19	In Progress	0	NR	LGI	50	50	Bonneville	ID	PACE	Goshen-Rgby transmission line or Goshen substation	10/1/20	Wind				
1145	6/15/19	In Progress	0	NR	UGI	1	1	Box Elder	UT	PACE	Blue Creek substation	12/31/21	Solar				
1146	6/15/19	In Progress	0	NR	UGI	3	3	Box Elder	UT	PACE	Gold Rush substation	12/31/21	Solar				
1147	6/25/19	In Progress	0	NR	OGI	3	3	Jackson	OR	PACW	Circuit 5R55 out of Oak Knoll substation	12/31/20	Solar				
1149	7/11/19	In Progress	0	ER	OGI	0	0	Benton	OR	PACW	Circuit 4M182 out of Hillview substation	1/0/1900	Solar				
1150	7/11/19	In Progress	0	ER	OGI	1	1	Benton	OR	PACW	Circuit 4M182 out of Hillview substation	1/0/1900	Solar				
1151	7/11/19	In Progress	0	ER	OGI	0	0	Benton	OR	PACW	Circuit 4M182 out of Hillview substation	1/0/1900	Solar				
1152	7/17/19	In Progress	0	ER	UGI	1	1	Utah	UT	PACE	Circuit PKD02 out of Parkside substation	1/0/1900	Solar				
1153	8/23/19	In Progress	0	NR/ER	LGI	665	665	Carbon	WY	PACE	Aeolus-Anticline transmission line	12/1/23	Wind				
1154	8/23/19	In Progress	0	NR/ER	LGI	590	590	Carbon	WY	PACE	Aeolus-Anticline transmission line	12/1/23	Wind				
1155	8/23/19	In Progress	0	NR/ER	LGI	470	470	Carbon	WY	PACE	Aeolus-Anticline transmission line	12/1/23	Wind				
1156	8/23/19	In Progress	0	NR/ER	LGI	380	380	Carbon	WY	PACE	Aeolus-Anticline transmission line	12/1/23	Wind				
1157	8/30/19	In Progress	0	NR	UGI	3	3	Tremonton	UT	PACE	Circuit BTH11 out of Bothwell substation	12/31/21	Solar				
1158	9/3/19	In Progress	0	NR	OGI	2	2	Douglas	OR	PACW	Circuit 5R133 out of Glendale substation	1/1/22	Hydro				
1159	9/9/19	In Progress	0	NR	QFLGI	31	31	Beaver	UT	PACE	South Milford substation	12/31/20	Geothermal				
1160	9/17/19	In Progress	0	NR/ER	LGI	70	70	Modoc	CA	PACW	Alturas-Hornet transmission line	12/30/22	Solar & Battery Storage				
1161	9/19/19	In Progress	0	NR/ER	LGI	40	40	Crook	OR	PACW	Ponderosa substation or Houston Lake-Ponderosa transmission line	5/30/22	Solar & Battery Storage				
1162	9/19/19	In Progress	0	NR/ER	LGI	80	80	Crook	OR	PACW	Ponderosa substation or Houston Lake-Ponderosa transmission line	5/30/22	Solar & Battery Storage				
1163	9/19/19	In Progress	0	NR/ER	LGI	40	40	Crook	OR	PACW	Baldwin Road-Ponderosa transmission line	5/30/22	Solar & Battery Storage				
1164	9/19/19	In Progress	0	NR/ER	LGI	80	80	Crook	OR	PACW	Baldwin Road-Ponderosa transmission line	5/30/22	Solar & Battery Storage				
1165	9/19/19	In Progress	0	NR/ER	LGI	600	600	Crook	OR	PACW	Corral-Ochoco #2 transmission line or Ochoco substation	1/1/24	Solar & Battery Storage				
1166	9/20/19	In Progress	0	NR/ER	LGI	400	400	Box Elder	UT	PACE	Ben Lomond substation	11/30/21	Battery				
1167	9/20/19	In Progress	0	NR/ER	LGI	400	400	Box Elder	UT	PACE	Ben Lomond substation	11/30/21	Battery				
1168	9/20/19	In Progress	0	NR/ER	LGI	650	650	Bannock	ID	PACE	Populus substation	11/30/21	Battery				
1169	9/20/19	In Progress	0	ER	SGI	20	20	Yakima	WA	PACW	Sunnyside substation	11/30/21	Battery				
1170	10/4/19	In Progress	0	NR	LGI	35	35	San Juan	UT	PACE	Pinto- Abajo Havasu Tap transmission line	4/1/23	Solar				
1171	10/8/19	In Progress	0	NR/ER	LGI	300	300	Converse	WY	PACE	Dave Johnston substation	6/1/21	Solar & Battery Storage				
1172	10/10/19	In Progress	0	NR/ER	LGI	900	900	Bingham	ID	PACE	Kettle substation	9/30/22	Wind				
1173	10/10/19	In Progress	0	ER	LGI	625	625	Carbon	WY	PACE	Aeolus substation	8/30/23	Wind				
1174	10/10/19	In Progress	0	NR/ER	LGI	750	750	Carbon	WY	PACE	Aeolus substation	12/31/26	Pump Storage				

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1175	10/11/19	In Progress	0	NR/ER	LGI	200	200	Salt Lake	UT	PACE	Terminal substation	12/31/23	Battery						
1176	10/11/19	In Progress	0	NR/ER	LGI	200	200	Salt Lake	UT	PACE	Terminal substation	12/31/23	Battery						
1177	10/11/19	In Progress	0	NR/ER	LGI	200	200	Utah	UT	PACE	Camp Williams - Mona transmission line	12/31/23	Battery						
1178	10/11/19	In Progress	0	NR/ER	LGI	200	200	Salt Lake	UT	PACE	Oquirrh substation	12/31/23	Battery						
1179	10/11/19	In Progress	0	NR/ER	LGI	200	200	Salt Lake	UT	PACE	Oquirrh substation	12/31/23	Battery						
1180	10/11/19	In Progress	0	NR/ER	LGI	200	200	Juab	UT	PACE	Clover substation	12/31/23	Battery						
1181	10/11/19	In Progress	0	NR/ER	LGI	200	200	Juab	UT	PACE	Clover substation	12/31/23	Battery						
1182	10/11/19	In Progress	0	NR	SGI	2	2	Fremont	ID	PACE	Circuit ASH11 out of Ashton substation	TBD	Hydro						
1183	10/15/19	In Progress	0	NR/ER	LGI	400	400	Carbon	WY	PACE	Heward substation	6/1/24	Wind						
1184	10/23/19	In Progress	0	NR/ER	LGI	500	500	Rosebud	MT	PACE	Colstrip substation	9/1/24	Wind & Battery Storage						
1186	10/23/19	In Progress	0	NR	SGI	1	1	Bannock	ID	PACE	Circuit LAV11 out of Lava substation	TBD	Solar						
1187	10/30/19	In Progress	0	ER	UGI	0	0	Grand	UT	PACE	SPA11 out of Spanish Valley substation	12.1.20	Solar						
1188	11/1/19	In Progress	0	NR/ER	LGI	80	80	Crook	OR	PACW	Stearns Butte substation	12/31/22	Solar & Battery Storage						
1189	11/8/19	In Progress	0	NR/ER	LGI	130	130	Converse	WY	PACE	Wagonhound-Jackalope transmission line	9/9/22	Solar & Battery Storage						
1190	11/19/19	In Progress	0	NR/ER	LGI	200	200	Walla Walla	WA	PACW	Walla Walla substation	9/1/21	Solar & Battery Storage						
1191	12/2/19	In Progress	0	NR	SGI	7	7	Teton	ID	PACE	Circuit CYN21 out of Canyon Creek substation	11/21/19	Hydro						

Company Name: Only displayed after Interconnection Agreement has been signed or is an affiliate of PacifiCorp.

Affiliate Initial Scoping Meeting Notification: It is PacifiCorp's intention to hold initial scoping meetings for all projects listed that are associated with an affiliate per the relevant timing requirements.

Service Type: Not applicable to Large Generator Interconnection requests made prior to 01/20/2004, Small Generator Interconnection requests, or Qualifying Facility Interconnection requests.

ER: Energy Resource Interconnection Service

NR: Network Resource Interconnection Service

NR with ER: Network Resource Interconnection Service requested, but also studied as Energy Resource. Customer will choose Service Type (ER or NR) prior to Facilities Study.

Study Reports: Available in separate folder on OASIS

Study Schedule Deviation: If displayed, click "More Info" link to view PDF files.

Exhibit REC/CREA-2

**Rocky Mountain Power, P.S.C. Wyoming No. 16, Schedule 38, Avoided Cost
Purchases from Non-Standard Qualifying Facilities (effective Oct. 27, 2017)**

Original Sheet No. 38-1

P.S.C. Wyoming No. 16

**Avoided Cost Purchases from
Non-Standard Qualifying Facilities
Schedule 38**

Available

To owners of Qualifying Facilities (“QF”) in all territory served by the Company in the State of Wyoming.

Applicable

To owners of existing or proposed QFs who desire to make sales to the Company and who: (1) have a design capacity greater than 1,000 kW and a historic or projected annual capacity factor of seventy percent or below, or (2) have an average monthly capacity and associated energy of greater than 10,000 kW and a historic or projected annual capacity factor of greater than seventy percent. Such owners shall be required to enter into written power purchase and interconnection agreements with the Company pursuant to the procedures set forth below. Additional or different requirements may apply to Wyoming QFs seeking to make sales to third-parties or out-of-system QFs seeking to wheel power to Wyoming for sale to the Company.

I. Process For Negotiating Power Purchase Agreements

A. Communications

Unless otherwise directed by the Company, all communications to the Company regarding QF power purchase agreements shall be directed in writing, by mail, as follows:

Rocky Mountain Power
Manager - QF Contracts
825 NE Multnomah St, Suite 600
Portland, Oregon 97232

Any requirement for written notice in this tariff shall be via mail unless the parties agree by mutual consent to an alternative form. The Company shall respond to all such communications in a timely manner as more fully described below.

(continued)

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Jeffrey K. Larsen, Vice President, Regulation

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on and after January 1, 2016

Original Sheet No. 38-2

P.S.C. Wyoming No. 16

**Avoided Cost Purchases from
Non-Standard Qualifying Facilities
Schedule 38**

I. A. Communications (continued)

If the Company is unable to respond on the basis of incomplete or missing information from the QF owner, the Company shall indicate what additional information is required. Thereafter, the Company shall respond in a timely manner following receipt of all required information as more fully described below.

B. Procedures

1. Examples of the Company's typical generic power purchase agreement may be obtained from the Company's website at www.pacificorp.com , or if the owner is unable to obtain it from the website, the Company shall send a copy via mail within seven calendar days of a written request directed to the address in Part I. A.

2. To obtain an indicative pricing proposal with respect to a proposed Project, the owner shall provide in writing to the Company, general project information reasonably required for the development of indicative pricing. A Project is defined as an existing or proposed QF that desires to make sales to the Company and that can satisfy the requirements of Schedule 38. General project information shall include, but not be limited to:
 - a) generation technology and other related technology applicable to the site;
 - b) design capacity (MW), station service requirements, and net amount of power to be delivered to the Company's electric system;
 - c) quantity and timing of monthly power deliveries (including Project ability to respond to dispatch orders from the Company);
 - d) proposed site location and electrical interconnection point;

(continued)

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Original Sheet No. 38-3

P.S.C. Wyoming No. 16

**Avoided Cost Purchases from
Non-Standard Qualifying Facilities
Schedule 38**

- I. B. **Procedures** (continued)
 - e) proposed on-line date (date on which deliveries of energy will commence) and outstanding permitting requirements;
 - f) demonstration of ability to obtain QF status;
 - g) fuel type(s) and source(s);
 - h) plans for fuel and transportation agreements, including plans for what party or parties will pay transmission costs;
 - i) proposed contract term and pricing provisions (i.e., fixed, escalating, indexed); and,
 - j) status of interconnection arrangements.

- 3. The Company shall not be obligated to provide an indicative pricing proposal until all information described in Paragraph 2 has been received in writing from the QF owner. Within 30 calendar days following receipt of all information required in Paragraph 2, the Company shall provide the owner with an indicative pricing proposal, which may include other indicative terms and conditions, tailored to the individual characteristics of the proposed Project. Such proposal may be used by the owner to make determinations regarding Project planning, financing and feasibility. However, such prices are merely indicative and are not final and binding. Prices and other terms and conditions are only final and binding to the extent contained in a power purchase agreement executed by both parties and accepted for filing by the Wyoming Public Service Commission. Upon request, the Company shall provide with the indicative prices a description of the methodology used to develop the prices.

(continued)

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Original Sheet No. 38-4

P.S.C. Wyoming No. 16

**Avoided Cost Purchases from
Non-Standard Qualifying Facilities
Schedule 38**

I. B. Procedures (continued)

4. If the owner desires to proceed with the Project after reviewing the Company's indicative proposal, it shall request in writing that the Company prepare a draft power purchase agreement to serve as the basis for negotiations between the parties. In connection with such request, the owner shall provide the Company with any additional Project information that the Company reasonably determines to be necessary for the preparation of a draft power purchase agreement, which may include, but shall not be limited to:
 - a) updated information of the categories described in Paragraph B.2;
 - b) evidence of adequate control of proposed site;
 - c) identification of, and timelines for obtaining any necessary governmental permits, approvals or authorizations;
 - d) assurance of fuel supply or motive force;
 - e) anticipated timelines for completion of key Project milestones; and,
 - f) evidence that any necessary interconnection studies have been completed and assurance that the necessary interconnection arrangements are being made in accordance with Part II.

5. The Company shall not be obligated to provide the owner with a draft power purchase agreement until all information required pursuant to Paragraph 4 has been received by the Company in writing. Within 45 calendar days following receipt of all information required pursuant to Paragraph 4, the Company shall provide the owner with a draft power purchase agreement containing a comprehensive set of proposed terms and conditions, including a specific pricing proposal for purchases from the Project. Such draft shall serve as the basis for subsequent negotiations between the parties and, unless clearly indicated, shall not be construed as a binding proposal by the Company.

(continued)

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Original Sheet No. 38-5

P.S.C. Wyoming No. 16

**Avoided Cost Purchases from
Non-Standard Qualifying Facilities
Schedule 38**

I. B. Procedures (continued)

6. After reviewing the draft power purchase agreement, the owner shall prepare an initial set of written comments and proposals regarding the draft power purchase agreement and shall provide such comments and proposals, or notice that it has none, to the Company. The Company shall not be obligated to commence negotiations with a QF owner until the Company has received an initial set of written comments and proposals from the QF owner. Following the Company's receipt of such comments and proposals, the owner shall contact the Company to schedule contract negotiations at such times and places as are mutually agreeable to the parties. In connection with such negotiations, the Company:
- a) shall not unreasonably delay negotiations and shall respond in good faith to any additions, deletions or modifications to the draft power purchase agreement that are proposed by the owner;
 - b) may request to visit the site of the proposed Project if such a visit has not previously occurred;
 - c) shall update its pricing proposals at appropriate intervals to accommodate any changes to the Company's avoided-cost calculations, the proposed Project or proposed terms of the draft power purchase agreement;
 - d) may request any additional information from the owner necessary to finalize the terms of the power purchase agreement and satisfy the Company's due diligence with respect to the Project; and,
 - e) shall resolve disputes related to power purchase agreement terms consistent with Part III of this tariff.

(continued)

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Original Sheet No. 38-6

P.S.C. Wyoming No. 16

**Avoided Cost Purchases from
Non-Standard Qualifying Facilities
Schedule 38**

I. B. Procedures (continued)

- 7. When both parties are in full agreement as to all terms and conditions of the draft power purchase agreement, the Company shall prepare and forward to the owner within 45 calendar days a final, executable version of the agreement. The Company reserves the right to condition execution of the power purchase agreement upon simultaneous execution of an interconnection agreement between the owner and the Company's power delivery function, as discussed in Part II. Prices and other terms and conditions in the power purchase agreement shall not be final and binding until the power purchase agreement has been executed by both parties and the Wyoming Public Service Commission accepts the agreement for filing.

II. Process for Negotiating Interconnection Agreements

In addition to negotiating a power purchase agreement, QFs intending to make sales to the Company are also required to enter into an interconnection agreement that governs the physical interconnection of the Project to the Company's transmission or distribution system. The Company's obligation to make purchases from a QF is conditioned upon the consummation of all necessary interconnection arrangements.

It is recommended that the owner initiate its request for interconnection as early in the planning process as possible, to ensure that necessary interconnection arrangements proceed in a timely manner on a parallel track with negotiation of the power purchase agreement.

Because of functional separation requirements mandated by the Federal Energy Regulatory Commission, interconnection and power purchase agreements are handled by different functions within the Company. Interconnection agreements (both transmission and distribution level voltages) are handled by the Company's power delivery function.

(continued)

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Original Sheet No. 38-7

P.S.C. Wyoming No. 16

**Avoided Cost Purchases from
Non-Standard Qualifying Facilities
Schedule 38**

II. A. Communications

Initial communications regarding interconnection agreements should be directed to the Company in writing as follows:

PacifiCorp Transmission
Transmission Account Management
825 NE Multnomah St, Suite 1600
Portland, Oregon 97232

Based on the Project size and other characteristics, the Company shall direct the QF owner to the appropriate individual within the Company's power delivery function responsible for negotiating the interconnection agreement with the QF owner. Thereafter, the QF owner should direct all communications regarding interconnection agreements to the designated individual, with a copy of any written communications to the address set forth above.

B. Procedures

Generally, the interconnection process involves (1) initiating a request for interconnection, (2) completion of studies to determine the system impacts associated with the interconnection and the design, cost, and schedules for constructing any necessary interconnection facilities, (3) execution of an Interconnection Facilities Agreement to address facility construction, testing and acceptance, and (4) execution of an Interconnection Operation and Maintenance Agreement to address ownership and operation and maintenance issues.

(continued)

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**First Revision of Sheet No. 38-8
Canceling Original Sheet No. 38-8**

P.S.C. Wyoming No. 16

**Avoided Cost Purchases from
Non-Standard Qualifying Facilities
Schedule 38**

II. B. Procedures (continued)

For interconnections impacting the Company's Transmission System, the Company shall process the interconnection application through PacifiCorp Transmission Services following the procedures for studying the generation interconnection described in the latest version of the Company's Open Access Transmission Tariff, PacifiCorp FERC Electric Tariff, Volume No. 11 Open Access Transmission Tariff (OATT) on file with the Federal Energy Regulatory Commission. A copy of the OATT is available on-line at:
<http://www.oasis.oati.com/ppw>.

For interconnections impacting the Company's Distribution System only, the Company will process the interconnection application through the Manager – QF Contracts at the address shown in Part I. A.

III. Process for Filing a Complaint with the Commission on Contract Terms

Before filing a complaint with the Wyoming Public Service Commission on any specific power purchase agreement term not agreed upon between the counterparty and the Company, a counterparty must wait 60 calendar days from the date it notifies the Company in writing that it cannot reach agreement on a specific term. This includes but is not limited to any disputes that are not resolved through the procedures set forth in Part I. B. 6.

(continued)

Issued by
Jeffrey K. Larsen, Vice President, Regulation

Issued: October 27, 2017

Effective: With service rendered
on and after September 12, 2017

Original Sheet No. 38-9

P.S.C. Wyoming No. 16

**Avoided Cost Purchases from
Non-Standard Qualifying Facilities
Schedule 38**

IV. Transmission Capacity and Avoided Costs Pricing *(continued)*

If a QF project is located in a geographic location that is transmission constrained or in which transmission capacity is physically available, but contractually constrained or unavailable, a QF project has two options regarding how proposed but not yet in-service transmission projects are treated in the calculation of avoided costs pricing:

- 1) The QF may elect to receive avoided cost pricing that contains two price streams: one stream that assumes proposed transmission projects are not completed, and a second price stream that assumes proposed transmission projects are completed. If this election is made, the first price stream that assumes proposed transmission projects are not completed will be in effect unless and until proposed transmission projects are energized and placed into service and the resulting incremental transmission capacity eliminates the QF deliverability restrictions.
- 2) The QF may elect to receive an avoided cost price based on transmission availability at the time indicative pricing is requested, which means the price assumes proposed transmission projects are not completed.

At the time a pricing request is made under Section I.B.2, the QF shall inform the Company as to which option it desires. If no selection is made by the QF, the Company will provide pricing based on option 2.

Issued by
Jeffrey K. Larsen, Vice President, Regulation

Issued: December 28, 2015

Effective: With service rendered
on and after January 1, 2016

Exhibit REC/CREA-3

**Rocky Mountain Power, P.S.C.U. No. 50 Schedule No. 38, Qualifying Facility
Procedures At 38.10 (effective Apr. 13, 2018)**

**ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 38**

STATE OF UTAH

Qualifying Facility Procedures

PREFACE:

1. The process outlined in this Schedule is typically applicable to projects already under development. General pricing information may be obtained by reference to quarterly avoided cost pricing updates filed by the Company with the Commission. Those filings can be found on the Public Service Commission of Utah website.
2. All submissions, responses and notices required in this Schedule must be done in electronic or hard copy format. Requests and information may be submitted to the Company at QRequests@pacificorp.com.
3. The QF pricing queue referenced in this Schedule is independent of and unrelated to the interconnection and transmission services queue maintained and administered by PacifiCorp Transmission Services pursuant to PacifiCorp Transmission Service's FERC approved Open Access Transmission Tariff (OATT), as posted on its Open Access Same-Time Information System (OASIS). The generation interconnection process is a critical and lengthy process that typically must be well underway before a power purchase agreement should be requested. QF Developers are strongly encouraged to gain a clear understanding of the transmission interconnection process and associated costs and timelines before requesting indicative pricing or a power purchase agreement under this schedule. The interconnection process is described in Section II.B of this Tariff.
4. The Company must use its reasonable commercial efforts to meet all Company deadlines specified herein, and shall attempt to make up any Company delays in meeting subsequent Company deadlines. QF Developer deadlines will be extended to reflect Company delays beyond Company deadlines specified herein. Under extenuating circumstances, the Company or a QF Developer may request an extension of any deadlines from the Commission.

(continued)

ELECTRIC SERVICE SCHEDULE NO. 38 - Continued

PREFACE: (continued)

5. Subject to the specific tariff provisions provided below, the general timelines and deadlines for actions or responses for Developers and the Company in this tariff are summarized here for convenience, along with references to the relevant tariff provisions:

In this tariff, “month” means thirty (30) days, such that five (5) months would equal one-hundred and fifty (150) days.

- a) Company must provide Developer illustrative, pro forma contract within seven (7) days of request [Section I.B.1];
- b) Developer may request indicative pricing at any time by submitting required information [Section I.B.2];
- c) Company must notify Developer whether request for indicative pricing is complete within seven (7) days of submission [Section I.B.3];
- d) Company must provide indicative pricing within thirty (30) days of notice of completeness [Section I.B.4];
- e) Developer must request proposed power purchase agreement and submit required information within sixty (60) days of receipt of indicative pricing [Section I.B.5];
- f) Company must notify Developer whether request for power purchase agreement and required information is complete within seven (7) days of submission to the Company [Section I.B.6];
- g) Company must provide Developer with proposed power purchase agreement within thirty (30) days of notice of completeness [Section I.B.6];
- h) Developer must provide Company with initial comments on and proposed edits to proposed power purchase agreement within thirty (30) days of receipt [Section I.B.7];
- i) Company must respond to Developer’s initial comments and edits within thirty (30) days of receipt, and commence negotiations over areas of disagreement [Section I.B.8];
- j) Indicative prices must be updated unless a PPA is executed within six (6) months after indicative pricing was provided by the Company [Section I.B.9];
- k) Company must complete all internal reviews and approvals within twenty-one (21) days after agreement is reached on a proposed final version of a power purchase agreement [Section I.B.8];
- l) PPA must be executed within five (5) months after Developer’s receipt of proposed power purchase agreement [Section I.B.10];
- m) Company must submit power purchase agreement to Commission for approval within seven (7) days of execution [Section I.B.8]; and
- n) Company must submit Transmission Service Request within seven (7) days after execution of purchase power agreement [Section I.B.8].

(continued)

ELECTRIC SERVICE SCHEDULE NO. 38 - Continued

PREFACE: (continued)

6. QF Developers should pay special attention to the fact that, as specified in the tariff sections that follow, a QF project will typically be removed from the QF pricing queue, and any indicative or proposed prices or agreements will no longer be valid, upon occurrence of any of the following events:
 - a) Failure of the QF Developer to submit to the Company a request for a power purchase agreement within sixty (60) days of its receipt of indicative pricing, as specified in Section I.B.5;
 - b) Failure of the QF Developer to submit written comments and proposals within thirty (30) days of its receipt of a proposed power purchase agreement, as specified in Section I.B.7;
 - c) Failure of the parties to execute a power purchase agreement within five (5) months after a proposed power purchase agreement was provided by the Company to the QF Developer, as specified in Section I.B.10.e.; or
 - d) A material change in the point of interconnection, a change in design capacity of more than 10%, a change in generation technology, or a change of more than three (3) months in the online date, as specified in Sections I.B.10.a.-d.

7. When a QF project is removed from the QF pricing queue, the developer may request new indicative pricing and a new agreement by timely following all of the steps outlined below, in which case it will be placed in the QF pricing queue as a new project.

AVAILABILITY: To owners of Qualifying Facilities (QFs) in all territory served by the Company in the state of Utah.

APPLICATION: To owners of existing or proposed QFs with a design capacity greater than 1,000 kW for a Cogeneration Facility or greater than 3,000 kW for a Small Power Production facility who desire to make sales to the Company, and to QFs who are not able to obtain pricing under Schedule 37 because the Schedule 37 cap has been reached. Such owners will be required to enter into written power purchase and interconnection agreements with the Company pursuant to the procedures set forth below. Additional or different requirements may apply to Utah QFs seeking to make sales to third-parties, or out-of-system QFs seeking to wheel power to Utah for sale to the Company. Cogeneration Facilities greater than 100,000 kW seeking a term of ten years or more must participate in a Company competitive bidding process (RFP). Information on Company RFPs can be found at <http://www.pacificorp.com/sup/rfps.html>

(continued)

ELECTRIC SERVICE SCHEDULE NO. 38 - Continued

I. Process For Negotiating Power Purchase Agreements

A. Communications

Unless otherwise directed by the Company, all communications to the Company regarding QF power purchase agreements should be directed in writing as follows:

Rocky Mountain Power
Manager - QF Contracts
825 NE Multnomah St, Suite 600
Portland, Oregon 97232
QFrequests@pacificorp.com

The Company will respond to all such communications in a timely manner. If the Company is unable to respond on the basis of incomplete or missing information from the QF owner, the Company shall indicate what additional information is required. Thereafter, the Company will respond in a timely manner following receipt of all required information.

B. Procedures

1. **Request for Pro Forma Contract.** The Company shall provide a QF Developer with a pro forma power purchase agreement within seven (7) days of its receipt of a request for the same. The pro forma document provided (i) does not constitute an offer to enter into an agreement, (ii) may include general proposed terms and conditions, and (iii) will not include pricing or project specific information. Anyone who desires to enter into a power purchase agreement with the Company must proceed in accordance with this Schedule to request indicative pricing under Section I.B.2, to request a proposed power purchase agreement under Section I.B.5, and to negotiate and execute a power purchase agreement that is executed by the Company and approved by the Commission.
2. **Request for Indicative Pricing.** To obtain indicative pricing with respect to a proposed project, a QF Developer must provide to the Company the following general project information:
 - a) A general description of the QF project and the QF Developer, including email address and other contact information;
 - b) generation technology and other related technology applicable to the site;

(continued)

ELECTRIC SERVICE SCHEDULE NO. 38 - Continued

- I. B. Procedures (continued)**
- c) design capacity (MW), station service requirements, and net amount of power to be delivered to the Company's electric system;
 - d) quantity and timing of monthly power deliveries (including project's ability to respond to dispatch orders from the Company) and an hourly generation profile (12X24 profile minimum, 8760 preferred) in Excel or other spreadsheet format with all formulae intact;
 - e) proposed site location and electrical interconnection point;
 - f) proposed on-line date and outstanding permitting requirements;
 - g) demonstration of ability to obtain QF status (FERC Form 556);
 - h) fuel type(s) and source(s);
 - i) plans for fuel and transportation agreements (Motive force plans);
 - j) proposed length of contract term; not to exceed 15 years;
 - k) status of transmission interconnection arrangements including interconnection queue number; and
 - l) other information promptly and reasonably requested by the Company.
3. **Notice of Completeness and Queue Position.** Within seven (7) days of its receipt of a request for indicative pricing and supporting materials as specified above, the Company shall confirm its receipt of the same and notify the QF Developer whether the submission is substantially complete or if additional information is required. The Company shall not be obligated to provide indicative pricing until all information described in Paragraph I.B.2 has been received from the QF Developer. Indicative pricing will be determined in light of other QF projects in the QF pricing queue ahead of the project, and using inputs and procedures as approved by the Commission. A QF will be added to the QF pricing queue as of the date the Company has confirmed receipt of all project information required in Paragraph I.B.2 and will retain its priority position in the QF pricing queue for purposes of subsequent requests for indicative pricing unless and until removed from the QF pricing queue as provided herein. The Company will notify the QF Developer of the date its project was added to the QF pricing queue. Once a QF Project has been added to the QF pricing queue, in the event additional clarifying information is reasonably required by the Company in order to calculate indicative prices, the deadlines in Section I.B.4 shall be extended on a day for day basis until the requested clarifying information has been provided.

(continued)

ELECTRIC SERVICE SCHEDULE NO. 38 - Continued

I. B. Procedures (continued)

4. **Indicative Pricing.** Within thirty (30) days following the date a QF project was added to the QF pricing queue under Section I.B.3, the Company shall provide the QF Developer with indicative pricing, which may include other indicative terms and conditions, tailored to the individual characteristics of the proposed project. For the initial indicative pricing request, the Company will include:
- a) indicative prices along with indicative terms and conditions,
 - b) a link to the Company's most recent quarterly avoided cost price filing with the Commission for an explanation of inputs and the Commission-approved method used to develop indicative prices,
 - c) a list of key model inputs that affected avoided cost pricing and descriptions of any significant changes to inputs since that most recent quarterly avoided cost filing, and
 - d) an explanation of how the developer can obtain additional information, including access to the model used to determine pricing.

For any pricing updates provided after the initial indicative prices, the Company shall provide items a) through d) and a description of any inputs or methods that have changed since the last quarterly filing or the last indicative prices provided. An indicative pricing proposal provided by the Company may be used by the QF Developer to make determinations regarding project planning, financing and feasibility. However, such prices are indicative only and may be subject to change by the Company as specified herein or by the Commission. Prices and other terms and conditions are only final and binding to the extent contained in a power purchase agreement executed by both parties and approved by the Commission. The Commission may approve, reject or conditionally approve a power purchase agreement and may at any time make changes to this Schedule, QF pricing methods and inputs, or terms and conditions applicable to QF pricing and power purchase agreements.

5. **Request for Proposed Power Purchase Agreement.** If a QF Developer desires to proceed forward with the project it must, within sixty (60) days of its receipt of indicative pricing, request that the Company prepare and submit for the Developer's review a proposed power purchase agreement. Absent timely submittal of such request, the project will be removed from the QF pricing queue and the indicative prices will no longer be valid. In connection with its request for a power purchase agreement, the Developer must provide the Company with the following additional project information:

(continued)

ELECTRIC SERVICE SCHEDULE NO. 38 - Continued

I. B. Procedures (continued)

- a) any available updates to the information specified in Paragraph I.B.2;
- b) evidence of adequate control of proposed site;
- c) identification of and timelines for obtaining any necessary governmental permits, approvals or authorizations;
- d) assurance of fuel supply or motive force;
- e) anticipated timelines for completion of key project milestones;
- f) evidence that any necessary interconnection studies are underway and that the necessary interconnection arrangements can timely be completed in accordance with Part II sufficient for the project to reach energization by the proposed on-line date;
- g) information describing the developer/owner of the proposed project, including name, address, and ownership organization chart; and
- h) other information promptly and reasonably requested by the Company.

6. **Notice of Completeness and Proposed PPA.** Within seven (7) days of its receipt of a request for a power purchase agreement and the information specified in Section I.B.5, the Company shall confirm its receipt of the same and notify the Developer whether any additional information is needed. The Company shall provide the Developer with a proposed power purchase agreement within thirty (30) days following the date of the Company's notice that the information required in Paragraph I.B.5 has been received and is substantially complete. The proposed power purchase agreement shall contain a comprehensive set of proposed terms and conditions, including specific pricing based on the indicative pricing provided, as adjusted if necessary in light of specifics of the project. The proposed power purchase agreement will also specify project specific data and exhibits that must be provided by the QF Developer prior to final approval or execution of the PPA. The proposal submitted by the Company shall serve as the basis for subsequent negotiations.
7. **Developer's Initial Comments and Edits.** Within thirty (30) days of receiving a proposed power purchase agreement, the QF Developer shall prepare and deliver to the Company an initial set of written comments and proposals, failing which the Project will be removed from the QF pricing queue and the proposed agreement and prices will no longer be valid.
8. **Company's Response and Responsibilities.** If the QF Developer's proposals are not acceptable, the Company shall commence negotiations on all outstanding areas of disagreement, and:

(continued)

ELECTRIC SERVICE SCHEDULE NO. 38 - Continued

I. B. Procedures (continued)

- a) shall respond to the developer's initial comments and proposals within thirty (30) days, and thereafter respond timely to subsequent comments and proposals;
- b) will not unreasonably delay negotiations and will respond in good faith to any additions, deletions or modifications to the proposed power purchase agreement that are proposed by the QF Developer;
- c) may request to visit the site of the proposed project if such a visit has not previously occurred;
- d) may request additional information from the Developer if reasonably necessary to finalize the terms of the power purchase agreement and satisfy the Company's due diligence with respect to the Project; and
- e) shall submit to PacifiCorp Transmission Services a request for network transmission service relating to the project within seven (7) days after execution of a power purchase agreement, or otherwise as early as practicable based on the applicable PacifiCorp Transmission Services tariff;
- f) shall complete credit, legal, upper management and any other required internal reviews of proposed terms and conditions within twenty-one (21) days after agreement was reached on a proposed final version of a power purchase agreement; and
- g) shall submit a fully executed power purchase agreement to the Commission for approval within seven (7) days of execution.

9. **Required Pricing Update.** The prices in the proposed power purchase agreement provided by the Company under Section I.B.6 shall be recalculated by the Company using the most recent available pricing inputs and methods approved by the Commission, but without a change in the QF project's pricing queue priority, if the QF Developer and the Company have not executed a power purchase agreement within six (6) months after indicative pricing was provided by the Company under Section I.B.4, except to the extent delays are caused by Company actions or inactions, which may include delays in obtaining legal, credit or upper management approval by the Company.

10. **Removal from QF Pricing Queue.** In addition to the circumstances described in I.B.5 and I.B.7, at any time during the process outlined in I.B.3 through I.B.9, the Company shall remove a QF project from the QF pricing queue, and any associated indicative prices, proposed prices or proposed agreement previously provided will no longer be valid, if any of the following occurs with respect to a QF project:

(continued)

ELECTRIC SERVICE SCHEDULE NO. 38 - Continued

I. B. Procedures (continued)

- a) A material change in the point of interconnection;
- b) A change in design capacity of 10% or more of the original specified design capacity;
- c) A change in generation technology (i.e. solar, wind, thermal), including a change between fixed tilt and tracking solar projects. Changes in the quantity and timing of monthly power deliveries will not cause removal from the QF pricing queue so long as the basic generation technology and design capacity have not changed;
- d) A change in the online date specified in the information provided under Section I.B.2.f of more than three (3) months earlier or later; or
- e) A PPA has not been executed by both parties within five (5) months after the proposed PPA was provided by the Company to the Developer, except to the extent delays are caused by Company actions or inactions.

11. **Standard PPA Terms.** Absent Commission approval to the contrary for good cause shown, a power purchase agreement executed under this Schedule shall include the following terms and conditions, among others:

- a) The scheduled commercial operation date must not be greater than thirty (30) months after the execution date of the power purchase agreement;
- b) The QF Developer must sign a System Impact Study Agreement with PacifiCorp Transmission (refer to Section 42.2 or Section 51.4 of PacifiCorp's OATT) within 120 days of the date a Commission Order approving the agreement has become final and non-appealable; and
- c) The QF Developer must provide 100% of the project development security within 30 days of the date a Commission Order approving the PPA has become final and non-appealable.
- d) The Company will retain the Renewable Energy Credits (RECs) associated with a QF's output during the portion of the contract term that the avoided cost price is based on the costs of a renewable resource.

II. Process for Negotiating Interconnection Agreements

In addition to negotiating a power purchase agreement, QFs intending to make sales to the Company are also required to enter into an interconnection agreement that governs the physical interconnection of the project to the Company's transmission or distribution system. The Company's obligation to make purchases from a QF is conditioned upon all necessary interconnection arrangements being consummated.

It is recommended that the owner initiate its request for interconnection as early in the planning process as possible, to ensure that necessary interconnection arrangements proceed in a timely manner on a parallel track with negotiation of the power purchase agreement. Interconnection agreements (both transmission and distribution level voltages) are handled by the Company's power delivery function, PacifiCorp Transmission Services.

(continued)

ELECTRIC SERVICE SCHEDULE NO. 38 - Continued

II. Process for Negotiating Interconnection Agreements (continued)

A. Communications

Initial communications regarding interconnection agreements should be directed to the Company in writing as follows:

PacifiCorp Transmission Services
Interconnection Requests
825 NE Multnomah St, Suite 1600
Portland, Oregon 97232
QFrequests@pacificorp.com

B. Procedures

Generally, the interconnection process involves (1) initiating a request for interconnection, (2) completion of studies to determine the system impacts associated with the interconnection and the design, cost, and schedules for constructing any necessary interconnection facilities, (3) execution of an interconnection agreement.

The QF project owner is responsible for all interconnection costs assessed by the Company on a nondiscriminatory basis.

For interconnections greater than twenty (20) megawatts, the Company will process the interconnection application through PacifiCorp Transmission Services generally following the procedures for studying the generation interconnection described in the Company's Open Access Transmission Tariff, PacifiCorp FERC Electric Tariff, Fifth Revised Volume No. 11 Pro Forma Open Access Transmission Tariff (OATT), as the same may be changed or updated, on file with the Federal Energy Regulatory Commission (FERC). A copy of the OATT is available on-line at <http://www.oasis.pacificorp.com>.

For interconnections equal to or less than twenty (20) megawatts, the Company will process the interconnection application in accordance with Utah Admin. Code R746-312.

The Company's interconnection forms and agreements, are provided electronically at the following address: <http://www.pacificorp.com/tran/ts/gip/qf.html>

(continued)

ELECTRIC SERVICE SCHEDULE NO. 38 - Continued

III. Process for Filing a Complaint with the Commission on Contract Terms

The Commission has both informal and formal dispute resolution processes which can be reviewed on the Commission website at the following address: <http://www.psc.utah.gov/complaints/index.html>.

These processes are available for any matter as to which the Commission has jurisdiction, which may include (i) QF PPA contracts, (ii) small QF interconnection agreements (less than 20 MW), and (iii) large QF interconnection agreements (more than 20 MW), so long as all of the QF output is sold exclusively to the Company. To the extent any portion of the QF output is sold to anyone other than the Company, a QF generation interconnection may be subject to FERC jurisdiction. Nothing in this Schedule will affect the jurisdiction of the Commission or FERC, and all parties will retain any and all rights they may have under any applicable state or federal statutes or regulations.

Exhibit REC/CREA-4

QF Power Contracting Process vs. Interconnection Process

QF Power Contracting Process vs. Interconnection Process

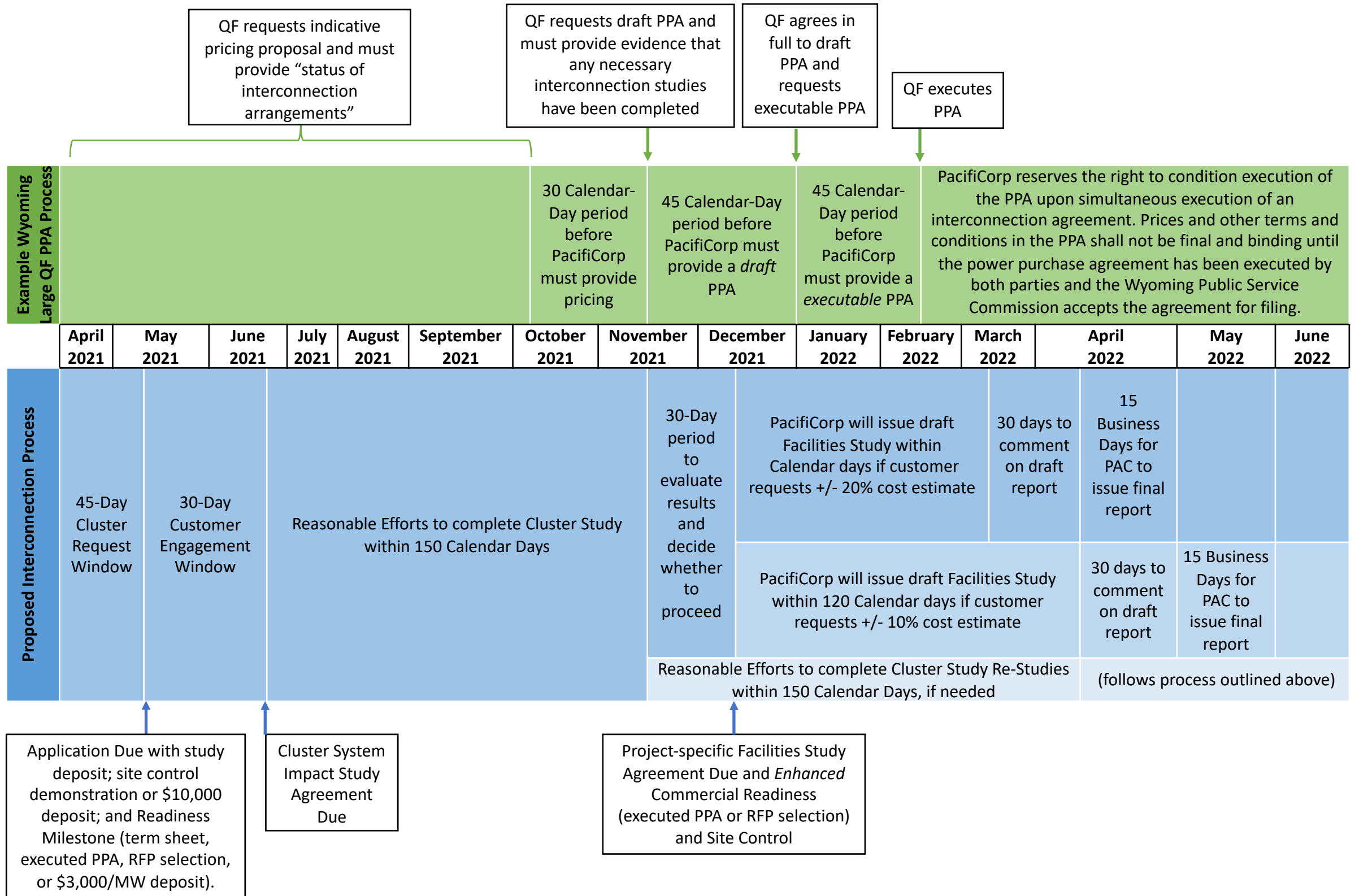


Exhibit REC/CREA-5

Pacific Power, Oregon Non-Standard Avoided Cost Rates (June 21, 2018)



A DIVISION OF PACIFICORP

OREGON
Non-Standard Avoided Cost Rates**AVOIDED COST PURCHASES FROM
ELIGIBLE QUALIFYING FACILITIES**

Page 1

Available

To owners of Qualifying Facilities ("QF") making sales of electricity to the Company in the State of Oregon.

Applicable

For power purchased from Qualifying Facilities that are not eligible for Standard Avoided Cost Rates. Owners of these Qualifying Facilities will be required to enter into a negotiated written power purchase agreement with the Company.

Definitions**Cogeneration Facility**

A facility which produces electric energy together with steam or other form of useful energy (such as heat) which are used for industrial, commercial, heating or cooling purposes through the sequential use of energy.

Qualifying Facilities

Qualifying cogeneration facilities or qualifying small power production facilities within the meaning of section 201 and 210 of the Public Utility Regulatory Policies Act of 1978 (PURPA), 16 U.S.C. 796 and 824a-3.

Small Power Production Facility

A facility which produces electric energy using as a primary energy source biomass, waste, renewable resources or any combination thereof and has a power production capacity which, together with other facilities located at the same site, is not greater than 80 megawatts.

On-Peak Hours or Peak Hours

On-peak hours are defined as 6:00 a.m. to 10:00 p.m. Pacific Prevailing Time Monday through Saturday, excluding NERC holidays.

Due to the expansions of Daylight Saving Time (DST) as adopted under Section 110 of the U.S. Energy Policy Act of 2005, the time periods shown above will begin and end one hour later for the period between the second Sunday in March and the first Sunday in April and for the period between the last Sunday in October and the first Sunday in November.

Off-Peak Hours

All hours other than On-Peak.

Excess Output

Excess output shall mean any increment of Net Output delivered at a rate, on an hourly basis, exceeding either the Facility Capacity Rating or the amount committed to in the contract. PacifiCorp shall pay the Qualifying Facility the Non-Firm Market Index Avoided Cost Price for all Excess Output.

Non-Firm Market Index Avoided Cost Prices

Non-Firm Market Index Avoided Cost Prices are available to Qualifying Facilities that do not elect to provide firm power. Qualifying Facilities taking this option will have contracts that do not include minimum delivery requirements, default damages for construction delay or, for under delivery or early termination, or default security for these purposes. Monthly On-Peak / Off-Peak prices paid are 93 percent of a blending of ICE Day Ahead Power Price Report at market hubs

(continued)

Effective for service on and after November 9, 2016

**OREGON****Non-Standard Avoided Cost Rates**
**AVOIDED COST PURCHASES FROM
 ELIGIBLE QUALIFYING FACILITIES**

Page 2

Non-Firm Market Index Avoided Cost Prices (continued)

for on-peak and off-peak firm index prices. The monthly blending matrix is available upon request. The Non-Firm Market Index Avoided Cost pricing option is available to all Qualifying Facilities. The Non-Firm Market Index Avoided Cost Price for Wind Qualifying Facilities will reflect integration costs.

Self Supply Option

Owner shall elect to sell all Net Output to PacifiCorp and purchase its full electric requirements from PacifiCorp or sell Net Output surplus to its needs at the Facility site to PacifiCorp and purchase partial electric requirements service from PacifiCorp, in accordance with the terms and conditions of the power purchase agreement and the appropriate retail service.

Qualifying Facilities Contracting Procedure**A. Communications**

Unless otherwise directed by the Company, all communications to the Company regarding QF power purchase agreements should be directed in writing as follows:

PacifiCorp
 QF Requests
 Resource & Commercial Strategy
 825 NE Multnomah St, Suite 600
 Portland, Oregon 97232
QFrequests@pacificorp.com

The Company will respond to all such communications in a timely manner. If the Company is unable to respond on the basis of incomplete or missing information from the QF owner, the Company shall indicate what additional information is required. Thereafter, the Company will respond in a timely manner following receipt of all required information.

B. Procedures

1. To obtain an indicative pricing proposal with respect to a proposed project, the owner must provide electronically, preferred, or in writing to the Company general project information reasonably required for the development of indicative pricing, including, but not limited to:
 - a) generation technology and other related technology applicable to the site
 - b) design capacity (MW), station service requirements, and net amount of power to be delivered to the Company's electric system
 - c) quantity, firmness, and timing of daily and monthly power deliveries (including project ability to respond to dispatch orders from the Company and maintenance schedule)
 - d) proposed site location and electrical interconnection point
 - e) proposed on-line date and outstanding permitting requirements
 - f) demonstration of ability to obtain QF status
 - g) fuel type(s) and source(s)
 - h) plans for fuel and transportation agreements
 - i) proposed contract term and pricing provisions
 - j) status of interconnection arrangements

(continued)

Effective for service on and after June 21, 2018

B. Procedures (Continued)

2. The Company shall not be obligated to provide an indicative pricing proposal until all information described in Paragraph 1 has been received in writing from the Qualifying Facility owner. Within 30 days following receipt of all information required in Paragraph 1, the Company will provide the owner with an indicative pricing proposal, which may include other indicative contract terms and conditions as allowed under federal law, state law, and as approved by the Commission, tailored to the individual characteristics of the proposed project. Indicative non-renewable prices will be calculated using the partial displacement differential revenue requirement, or PDDRR, method as approved by the Commission in Order No. 16-174. Consistent with Order No. 16-174 the floor for non-standard avoided cost prices is the wholesale power price forecast that is used to set sufficiency period avoided cost prices in standard QF contracts under Schedule 37. Indicative renewable pricing will be calculated using the methodology consistent with Commission Order No. 07-360 and Order No. 18-131.

The indicative pricing proposal may be used by the owner to make determinations regarding project planning, financing and feasibility. However, such prices are merely indicative and are not final and binding. Prices and other terms and conditions are only final and binding to the extent contained in a power purchase agreement executed by both parties. The Company will provide the owner with the indicative prices and a description of the methodology used to develop the prices.

3. If the owner desires to proceed forward with the project after reviewing the Company's indicative pricing proposal, it may request in writing that the Company prepare a draft power purchase agreement to serve as the basis for negotiations between the parties. In connection with such request, the owner must provide the Company with any additional project information that the Company reasonably determines to be necessary for the preparation of a draft power purchase agreement, which may include, but shall not be limited to:
- a) updated information of the categories described in Paragraph B.1,
 - b) evidence of adequate control of proposed site
 - c) identification of, and timelines for obtaining any necessary governmental permits, approvals or authorizations
 - d) assurance of fuel supply or motive force
 - e) anticipated timelines for completion of key project milestones
 - f) evidence that any necessary interconnection studies have been completed and assurance that the necessary interconnection arrangements are being made.
4. The Company shall not be obligated to provide the owner with a draft power purchase agreement until all information required pursuant to Paragraph 3 has been received by the Company in writing. Within 30 days following receipt of all information required pursuant to paragraph 3, the Company shall provide the owner with a draft power purchase agreement containing a comprehensive set of proposed terms and conditions, including specific pricing for purchases from the project. Such draft shall serve as the basis for subsequent negotiations between the parties and, unless clearly indicated, shall not be construed as a binding proposal by the Company.

(continued)



A DIVISION OF PACIFICORP

OREGON**Non-Standard Avoided Cost Rates****AVOIDED COST PURCHASES FROM
ELIGIBLE QUALIFYING FACILITIES**

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B. Procedures (Continued)

5. After reviewing the draft power purchase agreement, the owner may prepare an initial set of written comments and proposals regarding the draft power purchase agreement and forward such comments and proposals to the Company. The Company shall not be obligated to commence negotiations with a Qualifying Facility owner until the Company has received an initial set of written comments and proposals from the Qualifying Facility owner. Following the Company's receipt of such comments and proposals, the owner may contact the Company to schedule contract negotiations at such times and places as are mutually agreeable to the parties. In connection with such negotiations, the Company:
 - a) will not unreasonably delay negotiations and will respond in good faith to any additions, deletions or modifications to the draft power purchase agreement that are proposed by the owner
 - b) may request to visit the site of the proposed project if such a visit has not previously occurred
 - c) will update its pricing proposals at appropriate intervals to accommodate any changes to the Company's avoided-cost calculations, the proposed project or proposed terms of the draft power purchase agreement
 - d) may request any additional information from the owner necessary to finalize the terms of the power purchase agreement and satisfy the Company's due diligence with respect to the project.
6. When both parties are in full agreement as to all terms and conditions of the power purchase agreement, the Company will prepare and forward to the owner a final, executable version of the agreement within 15 business days. Prices and other terms and conditions in the power purchase agreement will not be final and binding until the power purchase agreement has been executed by both parties.
7. At any time after 60 days from the date that Qualifying Facility has provided its written notification pursuant to Paragraph 5, the Qualifying Facility may file a complaint with the Commission asking the Commission to adjudicate any unresolved contract terms or conditions.