



Joelle R. Steward
Vice President, Regulation
1407 West North Temple, Suite 330
Salt Lake City, UT 84116

November 7, 2019

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Wyoming Public Service Commission
2515 Warren Avenue, Suite 300
Cheyenne, Wyoming 82002

Attn: Chris Petrie, Chief Counsel

Docket No. 20000-__-ET-19
Record No. _____

**RE: IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER
TO INCREASE THE BLUE SKY BLOCK VALUE FROM 100 TO 200 KILOWATT
HOURS**

Dear Mr. Petrie:

In accordance with the Wyoming Public Service Commission's rules, please find enclosed for filing an original and four (4) copies of an application for authority to revise the standard Blue Sky block size from 100 to 200 kilowatt-hours within tariff Schedules 70 and 72. Also enclosed is the Company's filing fee check in the amount of \$5.00.

All formal correspondence and staff requests regarding this matter should be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon 97232

with copies to: Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 W. 27th St.
Cheyenne, Wyoming 82001
E-mail: stacy.splittstoesser@pacificorp.com

Wyoming Public Service Commission

November 7, 2019

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Daniel E. Solander
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Rocky Mountain Power
1407 W. North Temple, Suite 320
Salt Lake City, Utah 84116
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Please contact Stacy Splittstoesser, Wyoming Regulatory Affairs Manager at (307) 632-2677 if you have any questions.

Sincerely,



Joelle R. Steward
Vice President, Regulation

Enclosures

Daniel E. Solander
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
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E-mail: daniel.solander@pacificorp.com

Attorney for Rocky Mountain Power

BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF ROCKY MOUNTAIN POWER TO)	DOCKET NO. 20000-__-ET-19
INCREASE THE BLUE SKY BLOCK VALUE)	Record No. (_____)
FROM 100 TO 200 KILOWATT HOURS)	

COMES NOW, Rocky Mountain Power (the “Company”), and hereby applies to the Wyoming Public Service Commission (the “Commission”) for authority, pursuant to Chapter 3, Section 21(h) of the Commission’s Rules to revise the standard Blue Sky block size from 100 kilowatt-hours (“kWh”) to 200 kWh of renewable energy in Schedule No. 70 *Renewable Energy Rider – Optional* and Schedule No. 72 *Renewable Energy Rider – Optional Bulk Purchase Program*.

In support of this Application, the Company states as follows:

1. Rocky Mountain Power is a division of PacifiCorp, an Oregon corporation, which provides electric service to retail customers through its Rocky Mountain Power division in the states of Wyoming, Utah, and Idaho, and through its Pacific Power division in the states of Oregon, California, and Washington.

2. Rocky Mountain Power is a regulated public utility in the state of Wyoming and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to

retail customers in Wyoming. Rocky Mountain Power’s principal place of business in Wyoming is 2840 East Yellowstone Highway, Casper, Wyoming, 82602.

3. Communications regarding this filing should be addressed to:

Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 West 27th Street
Cheyenne, WY 82001
E-mail: stacy.splittstoesser@pacificorp.com

Daniel E. Solander
Senior Attorney
Rocky Mountain Power
1407 West North Temple, Suite 320
Salt Lake City, UT 84116
E-mail: daniel.solander@pacificorp.com

In addition, the Company respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred):	datarequest@pacificorp.com
By regular mail:	Data Request Response Center PacifiCorp 825 NE Multnomah St, Suite 2000 Portland, OR 97232

Informal inquiries may be directed to Stacy Splittstoesser, at (307) 632-2677.

4. The Blue Sky program is offered to Wyoming customers through Schedule No. 70 *Renewable Energy Rider – Optional* and Schedule No. 72 *Renewable Energy Rider – Optional Bulk Purchase Program*. Participation in the Blue Sky program is optional for customers who want to offset some of their energy usage requirements with renewable energy by purchasing blocks of bundled renewable energy certificates, (“RECs”), currently the tariffs define a block as 100 kWh of renewable energy (“Blocks”).

5. Renewable energy, as defined by the tariffs, includes bundled power or RECs derived from the following fuels: wind, solar, geothermal, certified low impact hydro, hydrogen derived from photovoltaic electrolysis or non-hydrocarbon derivation process, pipeline or irrigation canal hydroelectric systems, wave or tidal action, or low emissions biomass methane gas.

6. For customers to be able to claim they are a renewable energy user the Company retires the purchased RECs on the customer's behalf and maintains Green-E certification of the program to ensure the RECs meet certain quality criteria.

7. PacifiCorp negotiates bulk REC purchases to fulfill the needs of Blue Sky Block and Bulk options to customers across our system. The program is designed to make periodic supply purchases to match customer purchases and is trued-up after each calendar year. Renewable energy certificates are Western Renewable Energy Generation Information System ("WREGIS") registered and meet Green-E energy requirements.

8. The Company's preference is to source RECs from within the six states PacifiCorp serves, followed by the region, i.e. Pacific Northwest or Rocky Mountains, and then the greater Western Electricity Coordinating Council. Preference is also given to RECs sourced from newer facilities.

9. Participating customers sign-up voluntarily to pay the incremental cost of acquiring the RECs, plus the costs associated with offering the program. Participating customers in the Blue Sky Block program are billed for their usage at their basic service rate plus an additional, fixed line item charge for their Block purchase. Currently a single Blue Sky Block is equivalent to 100 kWh, or one tenth of a REC and customers can purchase as many Blocks as they want. A volume

discount is applied for businesses who purchase more than 101 Blocks per month, called Blue Sky Bulk or Quantity Savings.

10. Schedule 70 provides customers an option to purchase Blocks at \$1.95 per month to offset some or all of their energy usage. Schedule 72 provides a bulk purchase option at \$0.70 per month per Block plus a \$1,500 per year fixed charge for customers that want to purchase a minimum of 1,212 Blocks per year. For purchase commitments over two years in length or large purchases over 75,000 MWh per year, individually negotiated arrangements can be available, pursuant to the execution of a written contract.

11. Rocky Mountain Power supports the development of renewable energy sources, one of the ways this is accomplished is through the Blue Sky program. The Blue Sky program was implemented to provide an option for customers who want to be served by renewable energy to voluntarily purchase RECs to offset some or all of their usage. In an effort to meet growing customer demands in the renewable energy sector and to better align with market conditions, the Company is proposing to increase the size of each Blue Sky Block from 100 kWh to 200 kWh of renewable energy.

12. The Company has made similar filings in all six states where the Blue Sky program is offered. The proposed changes described herein are contingent upon the Company receiving approval from all six states in order to maintain uniformity in program management operations.

13. The current Block size and pricing was established in 2003 based on the average market REC price at that time. Over the past several years, the average REC price purchased for the program has continued to decrease, which enables the program to afford this change.

14. The increase to the Blue Sky Block size does not alter individually negotiated contracts, including any Blue Sky Select contracts, currently in place which are used to facilitate

direct purchase of RECs or any future individually negotiated agreements. There are currently no Wyoming customers with individually negotiated contracts.

15. As of April 2019 there were 5,176 participating Blue Sky Block customers in Wyoming. Some commercial and municipal customers are working towards green/renewable energy goals and are looking for other sources to help them meet their goals. The proposed change of doubling the amount of kilowatt-hours per Block for the same price will help customers increase the pace at which they can reach those goals. Increasing the size of Blue Sky Blocks and promoting the qualifying initiatives may also prove to be an additional incentive for customers to participate in the program.

16. There are several indicators suggesting that customers want to support more renewable energy but may not intuitively understand what a “block” represents. The average purchase size for the Block product across the customer base is around two Blocks. The recommendation to increase the Block size would better align customer’s perception with their intent. In addition, it would offer customers a lower cost path to matching all, or part, of their usage with renewable energy.

17. The Blue Sky program is self-funded. Funds collected through the tariffs are used to acquire RECs and cover administration program growth and maintenance costs. Funds remaining after REC purchases and program marketing/administration expenses are made available to help fund new community-based renewable energy installations through a competitive grant application process.

18. Increasing the number of kilowatt hours per Block benefits the customers who pay to voluntarily participate in the Blue Sky program and support renewable energy rather than funding community projects. While these community projects are impactful for the nonprofits and

the communities in which they are built, they do not have the same impact on the REC market that the Blue Sky program could by increasing the number of the RECs purchased.

19. The Company respectfully requests that the Commission approve the proposed tariff changes to increase the Blue Sky Block from 100 kWh to 200 kWh of renewable energy with no increase to the Block price, as shown in Schedule No. 70 *Renewable Energy Rider – Optional* and Schedule No. 72 *Renewable Energy Rider – Optional Bulk Purchase Program*, provided as Exhibit 1 to the Application.

WHEREFORE, in accordance with Chapter 3, Section 21(h) of the Commission’s Rules, the Company respectfully requests that the Commission issue an order allowing the Block size increase from 100 kWh to 200 kWh of renewable energy with a January 1, 2020, effective date.

DATED this 7th day of November, 2019.

Respectfully submitted,



Daniel E. Solander
Attorney for Rocky Mountain Power

Exhibit 1

ROCKY MOUNTAIN POWER

First Revision of Sheet No. 70-1
Canceling Original Sheet No. 70-1

P.S.C. Wyoming No. 16

Renewable Energy Rider - Optional Schedule 70

Available

In all territory served by the Company in the State of Wyoming.

Applicable

To Customers receiving service under the Company's Electric Service Schedules.

Administration

Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases may be used to fund Qualifying Initiatives as defined below.

Block

1 Block equals 200 kWh of Renewable Energy.

Charge per Block

\$1.95 per month

Monthly Bill

The Monthly Bill shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block. The Monthly Bill is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Monthly Bill shall be applied to the Customer's billing regardless of actual energy consumption.

Renewable Energy

Renewable Energy includes bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;

(continued)

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Joelle R. Steward, Vice President, Regulation

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Effective: With service rendered
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ROCKY MOUNTAIN POWER

First Revision of Sheet No. 70-2
Canceling Original Sheet No. 70-2

P.S.C. Wyoming No. 16

**Renewable Energy
Rider - Optional
Schedule 70**

Renewable Energy (continued)

- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;
- pipeline or irrigation canal hydroelectric systems;
- wave or tidal action; and
- low emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol or copper chrome arsenic.

Renewable Energy Credits (also known as Tradable Renewable Energy Credits, Renewable Energy Certificates, Green Tags or Carbon Credits) represent all of the regional and global environmental and emissions benefits associated with one unit of output from a qualifying renewable electricity generating resource. In some markets, the credits are certified by an independent third party and include a serial number for tracking purposes.

Offering must consist of 100% new Renewable Energy.

New Renewable Energy is (1) placed in operation (generating electricity) on or after January 28, 2000; (2) repowered on or after January 28, 2000 such that 80% of the fair market value of the project derives from new generation equipment installed as part of the repowering, or (3) a separable improvement to or enhancement of an operating existing facility that was first placed in operation prior to January 28, 2000, such that proposed incremental generation is contractually available for sale and metered separately than existing generation at the facility. Any enhancement of a fuel source that increases generation at an existing facility, without the construction of a new or repowered, separately metered generating unit, is not eligible to participate.

Preference will be given to resources within Pacific Power and Rocky Mountain Power service territories.

(continued)

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ROCKY MOUNTAIN POWER

First Revision of Sheet No. 72-1
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P.S.C. Wyoming No. 16

Renewable Energy Rider – Optional Bulk Purchase Program Schedule 72

Available

In all territory served by the Company in the State of Wyoming.

Applicable

To Customers receiving service under the Company's non-residential Electric Service Schedules.

Administration

Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases to Block purchases may be used to fund Qualifying Initiatives as defined below.

Block

1 Block equals 200 kWh of Renewable Energy. This program requires a minimum purchase of 1,212 Blocks per year. For the purpose of qualifying for this Schedule, Customers with multiple sites can sum their Block purchases across all Pacific Power and Rocky Mountain Power service territories to meet the minimum purchase requirement.

Charge per Block

\$0.70 per month **Plus**

\$1,500.00 per year fixed charge

For purchase commitments over two years in length or large purchases over 75,000 MWh per year, individually negotiated arrangements may be available, pursuant to the execution of a written contract.

Charge

The Charge can be billed either monthly, twice yearly or annually and shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block, plus the \$1,500 yearly fixed charge divided between the customer's billing choice (monthly, twice yearly or annually) and added to the Customer's standard bill. The Charge is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Charge shall be applied to the Customer's billing regardless of actual energy consumption.

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ROCKY MOUNTAIN POWER

First Revision of Sheet No. 72-3
Canceling Original Sheet No. 72-3

P.S.C. Wyoming No. 16

Renewable Energy Rider – Optional Bulk Purchase Program Schedule 72

Renewable Energy (continued)

without the construction of a new or repowered, separately metered generating unit, is not eligible to participate.

Preference will be given to resources within Pacific Power and Rocky Mountain Power service territories.

Renewable Energy purchases made to match Customer Block purchases are in addition to investments associated with the Company's Integrated Resource Plan, and are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

Qualifying Initiatives

1. Funding for locally-owned commercial-scale Renewable Energy projects that produce less than 10 MW of electricity. The preference is for local community based projects that provide strong environmental and economic benefit to local communities and Customers the Company services under this Schedule.
2. Funding research and development projects encouraging Renewable Energy market transformation in order to accelerate marketability of Renewable Energy technologies.
3. Investment in the above-market costs associated in the construction of Renewable Energy facilities or purchase by contract of Renewable Energy, reducing the costs of Renewable Energy to be competitive with cost-effective resources.

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ROCKY MOUNTAIN POWER

First Revision of Sheet No. 70-1
Canceling Original Sheet No. 70-1

P.S.C. Wyoming No. 16

Renewable Energy Rider - Optional Schedule 70

Available

In all territory served by the Company in the State of Wyoming.

Applicable

To Customers receiving service under the Company's Electric Service Schedules.

Administration

Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases may be used to fund Qualifying Initiatives as defined below.

Block

1 Block equals ~~100~~200 kWh of Renewable Energy.

Charge per Block

\$1.95 per month

Monthly Bill

The Monthly Bill shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block. The Monthly Bill is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Monthly Bill shall be applied to the Customer's billing regardless of actual energy consumption.

Renewable Energy

Renewable Energy includes bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;

(continued)

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~~Jeffrey K. Larsen~~Joelle R. Steward, Vice President, Regulation

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Dkt. No. 20000-~~469~~ -ETR-195

ROCKY MOUNTAIN POWER

First Revision of Sheet No. 70-2
Canceling Original Sheet No. 70-2

P.S.C. Wyoming No. 16

Renewable Energy Rider - Optional Schedule 70

Renewable Energy (continued)

- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;
- pipeline or irrigation canal hydroelectric systems;
- wave or tidal action; and
- low emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol or copper chrome arsenic.

Renewable Energy Credits (also known as Tradable Renewable Energy Credits, Renewable Energy Certificates, Green Tags or Carbon Credits) represent all of the regional and global environmental and emissions benefits associated with one unit of output from a qualifying renewable electricity generating resource. In some markets, the credits are certified by an independent third party and include a serial number for tracking purposes.

Offering must consist of 100% new Renewable Energy.

New Renewable Energy is (1) placed in operation (generating electricity) on or after January 28, 2000; (2) repowered on or after January 28, 2000 such that 80% of the fair market value of the project derives from new generation equipment installed as part of the repowering, or (3) a separable improvement to or enhancement of an operating existing facility that was first placed in operation prior to January 28, 2000, such that proposed incremental generation is contractually available for sale and metered separately than existing generation at the facility. Any enhancement of a fuel source that increases generation at an existing facility, without the construction of a new or repowered, separately metered generating unit, is not eligible to participate.

Preference will be given to resources within Pacific Power ~~& Light Company~~ and Rocky Mountain Power service territories.

(continued)

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ROCKY MOUNTAIN POWER

First Revision of Sheet No. 72-1
Canceling Original Sheet No. 72-1

P.S.C. Wyoming No. 16

Renewable Energy Rider – Optional Bulk Purchase Program Schedule 72

Available

In all territory served by the Company in the State of Wyoming.

Applicable

To Customers receiving service under the Company's non-residential Electric Service Schedules.

Administration

Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases to Block purchases may be used to fund Qualifying Initiatives as defined below.

Block

1 Block equals ~~100~~200 kWh of Renewable Energy. This program requires a minimum purchase of ~~121.2 megawatt hours (121,200 kWh or 1,212 Blocks)~~ per year. For the purpose of qualifying for this Schedule, Customers with multiple sites can sum their Block purchases across all Pacific Power & Light Company and Rocky Mountain Power service territories to meet the minimum purchase requirement.

Charge per Block

\$0.70 per month ~~(\$7.00 per MWh per month)~~ **Plus**

\$1,500.00 per year fixed charge

For purchase commitments over two years in length or large purchases over 75,000 MWh per year, individually negotiated arrangements may be available, pursuant to the execution of a written contract.

Charge

The Charge can be billed either monthly, twice yearly or annually and shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block, plus the \$1,500 yearly fixed charge divided between the customer's billing choice (monthly, twice yearly or annually) and added to the Customer's standard bill. The Charge is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Charge shall be applied to the Customer's billing regardless of actual energy consumption.

(continued)

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ROCKY MOUNTAIN POWER

First Revision of Sheet No. 72-3
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P.S.C. Wyoming No. 16

Renewable Energy Rider – Optional Bulk Purchase Program Schedule 72

Renewable Energy (continued)

without the construction of a new or repowered, separately metered generating unit, is not eligible to participate.

Preference will be given to resources within Pacific Power ~~& Light Company~~ and Rocky Mountain Power service territories.

Renewable Energy purchases made to match Customer Block purchases are in addition to investments associated with the Company's Integrated Resource Plan, and are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

Qualifying Initiatives

1. Funding for locally-owned commercial-scale Renewable Energy projects that produce less than 10 MW of electricity. The preference is for local community based projects that provide strong environmental and economic benefit to local communities and Customers the Company services under this Schedule.
2. Funding research and development projects encouraging Renewable Energy market transformation in order to accelerate marketability of Renewable Energy technologies.
3. Investment in the above-market costs associated in the construction of Renewable Energy facilities or purchase by contract of Renewable Energy, reducing the costs of Renewable Energy to be competitive with cost-effective resources.

(continued)

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