

May 31, 2022

Oregon Public Utility Commission ATTN: Filing Center 201 High Street SE, Suite 100 Salem, OR 97301-3612

RE: 2021 Redacted RPS Report for Calpine Energy Solutions, LLC; Docket No: UM -

To Whom It May Concern:

Please find attached the Redacted Renewable Portfolio Standard Report for Calendar Year 2021 for Calpine Energy Solutions, LLC ("Calpine Solutions"). A version of this report that states the figures Calpine Solutions has redacted here is being sent to the Public Utility Commission via FedEx.

In addition to the requirements of this report, Calpine Solutions is including Attachment B in both the confidential and public version. This attachment shows the location, resource type, vintage year, and percentage of total RECs coming from each state that will be used for Calpine Solutions' Oregon RPS compliance in 2021.

Should you have any questions or concerns, please contact me at 619-684-8200.

Thank you,

Bryan C. White

By C. WA

Senior Regulatory Compliance Analyst

**Enclosures** 

## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

| UM                              |                             |  |  |  |
|---------------------------------|-----------------------------|--|--|--|
| In the Matter of                | CALPINE ENERGY              |  |  |  |
| Calpine Energy Solutions, LLC's | SOLUTIONS, LLC'S RPS REPORT |  |  |  |
| 2021 RPS Report                 |                             |  |  |  |
|                                 |                             |  |  |  |

#### 2021 RPS Report

for

### Calpine Energy Solutions, LLC

DATED: May 31, 2022

Bryan White 619-684-8200 Senior Regulatory Compliance Analyst Calpine Energy Solutions, LLC 401 West A Street, Ste 500 San Diego, CA 92101

# Calpine Energy Solutions, LLC ("Calpine Solutions") Renewable Portfolio Standard Oregon Compliance Report 2021 UM -

As an introduction and summary of the Compliance Report, answer the following questions:

Why is Calpine Solutions submitting a Compliance Report? What information was used as the basis of the Compliance Report?

Calpine Solutions is submitting a Compliance Report to demonstrate compliance with the Oregon Department of Energy's RPS guidelines for 2021.

Did the company meet its Renewable Portfolio Standard (RPS) target, and if not, describe in detail why not?

Calpine Solutions

*Provide the following information in response to the requirements of OAR 860-083-0350:* 

OAR 860-083-0350(2)(a): The total number of megawatt-hours sold to retail electricity consumers covered by ORS 469A.052 by the electric company or sold in the service areas of each electric company covered by ORS 469A.052 by the electricity service supplier.

Calpine Solutions' load in 2021 was

OAR 860-083-0350(2)(b): The total number of renewable energy certificates, identified as either unbundled or bundled certificates, acquired in the compliance year and used to meet the renewable portfolio standard.

unbundled RECs and bundled RECs.

OAR 860-083-0350(2)(c): The total number of renewable energy certificates, identified as either unbundled or bundled certificates, acquired on or before March 31 of the year following the compliance year and used to meet the renewable portfolio standard.

unbundled RECs and bundled RECs were acquired prior to March 31, 2022.

OAR 860-083-0350(2)(d): The total number and cost of unbundled renewable energy certificates, identified as either banked or non-banked certificates, used to meet the renewable portfolio standard.

OAR 860-083-0350(2)(e): The total number of banked bundled renewable energy certificates that were used to meet the renewable portfolio standard.

OAR 860-083-0350(2)(f): The total number of renewable energy certificates, identified as either bundled or unbundled certificates, issued in the compliance year that were banked to serve Oregon electricity customers.

**OAR 860-083-0350(2)(g):** For electric companies, unless otherwise provided under subsection (2)(k) of this rule, the total number of renewable energy certificates included in the rates of Oregon retail electricity consumers that were sold since the last compliance report, including:

- (A) The names of the associated generating facilities; and
- (B) For each facility, the year or years the renewable energy certificates were issued.

N/A

**OAR 860-083-0350(2)(h):** Unless otherwise provided under subsection (2)(k) of this rule, for each generating facility associated with the renewable energy certificates included in subsections (2)(b), (c), (f), or (g) of this rule the following information:

- (A) The name of the facility;
- (B) The county and state where the facility is located;
- (C) The type of renewable resource;
- (D) The total nameplate megawatt capacity of the facility;
- (E) For an electric company, the Oregon share of the nameplate megawatt capacity of the facility;
- (F) The year of the first delivery of qualifying electricity or the first year of the contract for the purchase of unbundled renewable energy certificates; and
- (G) The duration of the contract or the amortization period of a facility owned by the electric company or the planned lifetime of a facility owned by the electricity service supplier.

Please see Attachment A.

**OAR 860-083-0350(2)(i):** The amounted of alternative compliance payments the electric company or electricity service supplier elected to use or was required to use to comply with the applicable renewable portfolio standard.

Calpine Solutions

OAR 860-083-0350(2)(j): For an electric company, sufficient data, documentation, and other information to demonstrate that any voluntary alternative compliance payments were a reasonable compliance method.

Calpine Solutions

OAR 860-083-0350(2)(k): Documentation of use of renewable energy certificates from the system under OAR 330-160-0020 established for compliance with the applicable renewable portfolio standard.

Please see Attachment A of the RECs proposed to be retired in WREGIS upon Commission approval including RECs retired by Portland General Electric Co. and PacifiCorp on behalf of Calpine Energy Solutions, LLC in accordance with OPUC Docket UE-390 and ORS 469A.005(4)(c).

Additionally Calpine Energy Solutions, LLC proposes to retire an additional RECs, vintage March 2022, from the White Creek Wind Facility, but these RECs have not been generated in

WREGIS in time for this report's filing deadline. When these RECs are generated in WREGIS, Calpine Energy Solutions, LLC will provide additional documentation.

**OAR 860-083-0350(2)(I):** For each electric company, a detailed explanation of any material deviations from the applicable implementation plan filed under OAR 860-083-0400, as acknowledged by the Commission.

OAR 860-083-0350(2)(m): As specified in OAR 860-083-0100, the total number and cost of bundled renewable energy certificates used for compliance.

OAR 860-083-0350(2)(n): For each electric company, its projected annual revenue requirement as calculated in OAR 860-083-0200 and its total cost of compliance.

N/A

OAR 860-083-0350(2)(o): For each electricity service supplier, its total cost of compliance, its average cost of compliance, and its cost limit as specified in OAR 860-083-0300(2), including all calculations.

| Row | Description   | Pacificorp                               | <u>Portland</u><br>General |  |
|-----|---|--|----------------------------|--|
| Α   | Utility Load  | 13,437,150                               |                            |  |
| В   | Utility Revenue per MWh                                   | Utility Revenue per MWh \$93.88 \$105.90 |                            |  |
| С   | Calpine Retail Load in MWh                                |  |                            |  |
| D   | Calpine Total Revenue                                     |  |                            |  |
| E   | Calpine Average Rev. = Calpine Rev. (D) / Calpine MWh (C) |  |                            |  |
| F   | Calpine Load (C) / Utility Load (A)                       |  |                            |  |
| G   | Weighted Average = (Row F X E) + ([1-F] X B)              |  |                            |  |
| Н   | Weighted Average  |  |                            |  |
| 1   | Weighted Average X 4%                                     |  |                            |  |
| J   | Total Cost of RECs =                                      |  |                            |  |
|     | ESS Cost of Compliance =                                  |  |                            |  |
| К   | / Calpine Load in MWh                                     |  |                            |  |
| L   | / Calpine Load in MWh (C)                                 |  |                            |  |
| М   | / Calpine Load in MWh (C)                                 |  |                            |  |
| N   | Is Cost of Comp. > Weighted Avg. X 4%?                    |  |                            |  |

OAR 860-083-0350(2)(p): For each electric company, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in ORS 469A.1 00(1) is reached for the compliance year.

OAR 860-083-0350(2)(q): For each electricity service supplier, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in OAR 860-083-0300(2) is reached for the compliance year.

Please see table under section "OAR 860-083-0350(2)(o).

OAR 860-083-0350(2)(r): As specified in OAR 860-083-0100, the number and total cost of all bundled renewable energy certificates issued.

Calpine Solutions

**OAR 860-083-0350(2)(s):** As specified in OAR 860-083-0100, the number and total cost of bundled renewable energy certificates issued that are associated with new qualifying electricity since the last compliance report.

Calpine Solutions

OAR 860-083-0350(2)(t): For each electric company or electricity service supplier that, pursuant to ORS 469A.145(3), used unbundled renewable energy certificates associated with electricity generated in this state by a qualifying facility as defined in OAR 860-029-0010(27) to fulfill more than 20 percent of the requirements of the applicable renewable portfolio standard, the report specified in section (1) of this rule must include the following information for each generating facility associated with the unbundled renewable energy certificates that exceed 20 percent of the RPS.

- (A) The name of the qualifying facility;
- (B) The site address and county in Oregon where the qualifying facility is located; and
- (i) A copy of the most recent document produced by the Oregon Department of Energy that lists the qualifying facility in question as one of the qualifying facilities located in Oregon that is eligible to create renewable energy certificates to satisfy the Oregon renewable portfolio standards; or
- (ii) A copy of the qualifying facility's power purchase agreement requiring maintenance of qualifying facility status and a copy of the qualifying facility's certification document as filed with the Federal Energy Regulatory Commission.

Please see Attachment C.

**OAR 860-083-0350(6):** Each electric company subject to ORS 469A052 and each electricity service supplier subject to ORS 469A065 must post on its web site the public portion of the four most recent annual compliance reports required under this rule and provide a copy of the most recent such report to any person upon request The public portions of the most recent compliance report must be posted within

30 days of the Commission decision in section (5) of this rule. The posting must include any Commission determinations under section (5) of this rule.

Calpine Solutions will post the public portion of this report on its website within 30 days of the Commission's decision.

OAR 860-083-0350(7): Consistent with Commission orders for disclosure under OAR 860-038-0300, each electric company subject to ORS 469A.052 and each electricity service supplier subject to ORS 469A.065 must provide information about its compliance report to its customers by bill insert or other Commission-approved method. The information must be provided within 90 days of the Commission decision in section (5) of this rule or coordinated with the next available insert required under OAR 860-038-0300. The information must include the URL address for the compliance reports posted under section (6) of this rule.

Calpine Solutions will, on its physical invoices, include a link to the public information in this report to its customers within 90 days of the Commission's decision.

### Attachment A

### Attachment B

| Location | Resource<br>Type | <u>Vintage</u><br>Year | % of 2021 RPS<br>Compliance |
|----------|------------------|------------------------|-----------------------------|
| OR       | Wind             | 2014                   | 4.83%                       |
| OR       | Wind             | 2021                   | 4.96%                       |
| OR       | Biomass          | 2017                   | 6.77%                       |
| OR       | Biomass          | 2018                   | 7.68%                       |
| OR       | Biomass          | 2019                   | 42.48%                      |
| OR       | Biomass          | 2021                   | 0.19%                       |
| OR       | Hydro            | 2021                   | 22.47%                      |
| OR       | Solar            | 2021                   | 10.49%                      |
| WA       | Wind             | 2021                   | 0.06%                       |
| WA       | Wind             | 2022                   | 0.06%                       |

## Attachment C