

May 30, 2025

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

RE: 2024 Redacted RPS Report for Calpine Energy Solutions, LLC;
Docket No: UM - _____

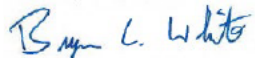
To Whom It May Concern:

Please find attached the Redacted Renewable Portfolio Standard Report for Calendar Year 2024 for Calpine Energy Solutions, LLC ("Calpine Solutions"). A Confidential Version of this report is being submitted separately. The Confidential Version contains both a PDF report as well as an Excel spreadsheet as provided by Oregon Public Utility Commission Staff.

In addition to the requirements of this report, Calpine Solutions is including Attachment B in both the Confidential and Public Versions. 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 2024.

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

Thank you,



Bryan C. White –
Senior Regulatory Compliance Analyst

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM - _____

In the Matter of

Calpine Energy Solutions, LLC's

2024 RPS Report

**CALPINE ENERGY
SOLUTIONS, LLC'S RPS REPORT**

2024 RPS Report

for

Calpine Energy Solutions, LLC

DATED: May 30, 2025

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
2024
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 2024.

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

Calpine Solutions [REDACTED]

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 2024 [REDACTED]

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.

[REDACTED]

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.

[REDACTED]

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.

[REDACTED]

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

[REDACTED]

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.

[REDACTED]

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 amount 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 [REDACTED]

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 [REDACTED]

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 which includes 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).

OAR 860-083-0350(2)(l): 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.

■

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	Portland General
A	Utility Load*	13,949,228	19,053,091
B	Utility Revenue per MWh*	\$108.50	\$143.90
C	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)		
H	Weighted Average	■	■
I	Weighted Average X 4%	■	■
J	Total Cost of RECs ■		
K	ESS Cost of Compliance ■) / Calpine Load in MWh		
L	■ / Calpine Load in MWh (C)	■	■
M	■ / Calpine Load in MWh (C)	■	■
N	Is Cost of Comp. > Weighted Avg. X 4%?	■	■

*Per Order No. 25-066, PacifiCorp was allowed to not file its Supplement to FERC Form No. 1 until May 31, 2025. As a result, Calpine Solutions does not yet have available PacifiCorp's 2024 Load and Revenue information and is substituting 2023 load and revenue information here until such time as the Supplemental Form 1 is available. At that time, Calpine Solutions will revise the above table and refile.

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.100(1) is reached for the compliance year.

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

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). [REDACTED]
[REDACTED]

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.

[REDACTED]

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.

[REDACTED]

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 Type	Vintage Year	% of 2024 RPS Compliance
ID	Wind	2014	1.33%
OR	Biomass	2021	22.62%
OR	Biomass	2022	11.53%
OR	Biomass	2023	9.58%
OR	Hydro	2021	13.40%
OR	Hydro	2024	23.95%
OR	Solar	2024	8.02%
WA	Wind	2014	4.99%
WY	Wind	2014	4.58%

Attachment C