

**111(d) Compliance Strategies  
September 25-26, 2014 Public Input Meeting**

Strategy	New EE	New RE	EE/RE Allocation	Re-Dispatch Coal Floor	Re-Dispatch NGCC Floor	Re-Dispatch NGCC Ceiling	States with fossil plants, no retail load (MT, AZ, CO)
A	Cost-effective selection at pre-111(d) levels	Cost-effective selection at pre-111(d) levels, additional for OR state RPS (WA/CA met with unbundled RECs), additional for 111(d) after re-dispatch	Flexible system allocation	Annual CF floor at higher of coal contract minimums or 3-months of full load operation, Order by Variable Operating Cost	Annual CF floor at 6-months of 1x1 Operation	Annual CF ceiling at SSR availability rate (EFOR and Planned Maintenance)	Meet with flexible system allocation of RE/EE and system re-dispatch
B	Up to 1.5% of retail sales beginning 2017 consistent with EPA goal calculations	Cost-effective selection at pre-111(d) levels, additional for OR state RPS (WA/CA met with unbundled RECs), additional for 111(d) after re-dispatch	Flexible system allocation	Annual CF floor at higher of coal contract minimums or 3-months of full load operation, Order by Variable Operating Cost	Annual CF floor at 6-months of 1x1 Operation	Annual CF ceiling at SSR availability rate (EFOR and Planned Maintenance)	Meet with flexible system allocation of RE/EE and system re-dispatch
C	Up to 1.5% of retail sales beginning 2017 consistent with EPA goal calculations	Cost-effective selection at pre-111(d) levels, incremental need for OR, WA, CA state RPS and up to levels assumed in EPA calculation of goals applied to PacifiCorp's system	Flexible system allocation	Annual CF floor at higher of coal contract minimums or 3-months of full load operation, Order by Variable Operating Cost	Annual CF floor at 6-months of 1x1 Operation	Annual CF ceiling at SSR availability rate (EFOR and Planned Maintenance)	Meet with flexible system allocation of RE/EE and system re-dispatch
A'	Cost-effective selection at pre-111(d) levels	Cost-effective selection at pre-111(d) levels, additional for OR state RPS (WA/CA met with unbundled RECs), additional for 111(d) after re-dispatch	Allocation by State Boundary (ID, CA goes un-used for 111(d) compliance purposes)	Annual CF floor at higher of coal contract minimums or 3-months of full load operation, Order by Variable Operating Cost	Annual CF floor at 6-months of 1x1 Operation	Annual CF ceiling at SSR availability rate (EFOR and Planned Maintenance)	Application of state 111(d) constraint levelized CO2 shadow price (\$/ton) from IPM as incremental cost
B'	Up to 1.5% of retail sales beginning 2017 consistent with EPA goal calculations	Cost-effective selection at pre-111(d) levels, additional for OR state RPS (WA/CA met with unbundled RECs), additional for 111(d) after re-dispatch	Allocation by State Boundary (ID, CA goes un-used for 111(d) compliance purposes)	Annual CF floor at higher of coal contract minimums or 3-months of full load operation, Order by Variable Operating Cost	Annual CF floor at 6-months of 1x1 Operation	Annual CF ceiling at SSR availability rate (EFOR and Planned Maintenance)	Application of state 111(d) constraint levelized CO2 shadow price (\$/ton) from IPM as incremental cost
C'	Up to 1.5% of retail sales beginning 2017 consistent with EPA goal calculations	Cost-effective selection at pre-111(d) levels, incremental need for OR, WA, CA state RPS and up to levels assumed in EPA calculation of goals applied to PacifiCorp's system	Allocation by State Boundary (ID, CA goes un-used for 111(d) compliance purposes)	Annual CF floor at higher of coal contract minimums or 3-months of full load operation, Order by Variable Operating Cost	Annual CF floor at 6-months of 1x1 Operation	Annual CF ceiling at SSR availability rate (EFOR and Planned Maintenance)	Application of state 111(d) constraint levelized CO2 shadow price (\$/ton) from IPM as incremental cost