



825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

March 26, 2021

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

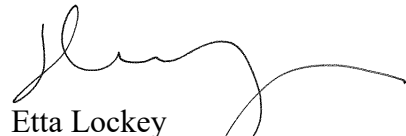
Attn: Filing Center

**RE: UM 1631 – Petition for Limited Waiver of OAR 860-029-0085(4)**

PacifiCorp d/b/a Pacific Power submits for filing its petition for a limited waiver of the filing deadline in the above referenced docket.

Informal inquiries may be directed to Cathie Allen, Manager, Regulatory Affairs, at (503) 813-5934.

Sincerely,



Etta Lockey  
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1631**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Petition for Limited Waiver of the Filing  
Deadline in OAR 860-029-0085(4).

**PACIFICORP’S PETITION FOR  
LIMITED WAIVER OF THE FILING  
DEADLINE IN OAR 860-029-0085(4)**

Pursuant to Oregon Administrative Rule (OAR) 860-001-0000(2) and OAR 860-029-0005(4), PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) petitions the Public Utility Commission of Oregon (Commission) for a limited waiver of the filing deadline in OAR-029-0085(4), which requires PacifiCorp’s 2021 annual avoided cost update to be filed on May 1, 2021. The Company respectfully requests that the filing deadline be extended to October 1, 2021. Good cause exists to grant the Company’s motion.

**WAIVER REQUEST**

On June 15, 2020, PacifiCorp filed an application with the Commission for an order authorizing the Company to move from a serial “first-come, first-served” interconnection study process to a “Cluster Study” process for Qualifying Facility (QF) interconnection (Queue Reform Proposal).<sup>1</sup> The Commission approved PacifiCorp’s Queue Reform Proposal subject to the recommendations set forth in the Staff Report dated August 3, 2020 as modified by Order 20-268.<sup>2</sup> To address a concern raised by QF parties relating to the uncertainty of avoided cost price

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<sup>1</sup> *In the Matter of PacifiCorp d/b/a Pacific Power Application for an Order Approving Queue Reform Proposal*, Docket No. UM 2108 (June 15, 2020).

<sup>2</sup> Docket No. UM 2108, Order No. 20-268 (Aug. 19, 2020).

changes, the Staff Report recommended that PacifiCorp move its avoided cost update from May 1 to October 1.<sup>3</sup> The Staff Report reasoned:

...that the timing of the Transitional Cluster does not align with the May 1, 2021, avoided cost update. There is a particular value in helping QFs make the most informed choice to commit to the Cluster Study Process in this first time through.<sup>4</sup>

The results of the Company's first interconnection cluster study or "Transitional Cluster" as approved in Order 20-028 are expected in April 2021. Under OAR-029-0085(4), PacifiCorp's next annual avoided cost update is due May 1, 2021. Thus, pursuant to the Staff Report recommendation, PacifiCorp is requesting that the Commission grant the Company a limited waiver of OAR-029-0085(4) and allow the Company to file its 2021 annual avoided cost update on October 1, 2021.

### CONCLUSION

Based on the foregoing, PacifiCorp respectfully requests that the Commission grant PacifiCorp a limited waiver of OAR OAR-029-0085(4) and allow PacifiCorp to file its 2021 annual avoided cost update on October 1, 2021. Good cause exists to grant the Company's request.

Respectfully submitted this 26th day of March, 2021, on behalf of PacifiCorp.



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<sup>3</sup> *Id.*, Appendix A at 26.

<sup>4</sup> *Id.*