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Portland, Oregon 97232

February 21, 2024

VIA ELECTRONIC FILING

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

Re: UM 1631—PacifiCorp's Petition for Limited Waiver of OAR 860-027-0350

PacifiCorp d/b/a Pacific Power hereby submits for filing its Petition for Limited Waiver of OAR 860-027-0350.

Please direct any inquiries about this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew McVee".

Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1631

In the Matter of

PACIFICORP, dba PACIFIC POWER

Application for Authority to Implement
Revised Depreciation Rates

Petition for Limited Waiver of
OAR 860-027-0350(2)

I. Petition

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) respectfully petitions the Public Utility Commission of Oregon (OPUC or Commission) for a limited waiver of the requirement to file a new depreciation study with the Commission “no less frequently than once every five years” contained in OAR 860-027-0350(2).

The Company filed its most recent depreciation study with the Commission in September of 2018.¹ The Commission approved the Company’s 2018 depreciation study in 2020, with rates effective January 1, 2021.² Contemporaneously, all five of PacifiCorp’s sister-state utility commissions approved the Company’s same depreciation study, though subject to additional settlement conditions which directed the Company to file its next depreciation study within five years of the respective commission order, resulting in a requirement to file the next study in 2025.³ This settlement condition was similar to a condition approved by this Commission in the Company’s prior 2013 depreciation study proceeding.⁴

The Commission’s Order on PacifiCorp’s 2018 depreciation study did not include the same or similar requirement.

¹ *In re PacifiCorp’s 2018 Depreciation Rates*, Docket No. UM 1968.

² Order No. 20-470, at 1 (Dec. 16, 2020).

³ *See, e.g., In re Rocky Mountain Power’s 2018 Depreciation Study*, Docket No. 18-035-36, Order at 3 (Apr. 20, 2020).

⁴ *In re PacifiCorp’s 2013 Depreciation Study*, Docket No. UM 1647, Order No. 13-347, at 2 (Sep. 25, 2013) (“The parties agree that Pacific Power will implement the revised depreciation rates effective January 1, 2014, and that Pacific Power will file a new depreciation study within five years of the date that this Commission approves their stipulation.”); *Id.* Appendix A, ¶ 12.

Under OAR 860-027-0350(2), the Company was required to file its next depreciation study by September of 2023. To align with the requirements to file a depreciation study in each of additional state jurisdictions in 2025, the Company is requesting a limited waiver of this regulation.

The Commission can waive any of the Budget, Finance, Accounting, and Annual Reporting regulations for good cause, so long as the waiver is consistent with Oregon statutes.⁵ The Company represents that there is good cause, because the Company is only requesting additional time to comply with the requirement, as opposed to a full waiver of the requirement. This result would also be reasonable, because it would avoid accelerating the Company's depreciation study that it must file in five other states by up to a full year, and would avoid devoting additional Commission and Company resources to investigating and reviewing another substantial filing during the 2024 calendar year.

II. Conclusion

PacifiCorp respectfully requests the Commission grant a limited waiver of OAR 860-027-0350(2), and direct the Company to file its next depreciation study prior to December 31, 2025.

Respectfully submitted this 21st day of February, 2024.

/s/ Zachary Rogala
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⁵ OAR 860-02-000(2).