

November 2, 2015

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-1166

Attn: Filing Center

**RE: UM 1483(5) – Oregon Solar Incentive Program Deferral Supply Service Adjustment**

In compliance with ORS 757.205, OAR 860-022-0025, OAR 860-022-0030, and ORS 757.210, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) provides the following information regarding Schedule 204 Oregon Solar Incentive Program Deferral Supply Service Adjustment (Schedule 204), of the Company's Tariff P.U.C. OR No. 36, which sets forth all rates, tolls, charges, rules, and regulations applicable to electric service in the State of Oregon.

The purpose of this filing is to request approval to amortize the deferral balance relating to Docket UM 1483(5) associated with the Company's costs for the Oregon Solar Incentive Program (OSIP) deferred during the twelve months ended September 30, 2015.<sup>1</sup> The Company has reviewed and revised rates for this purpose annually; the last filing was effective January 1, 2015.<sup>2</sup> As discussed herein, because the proposed change to the annual collection amount for 2016 is minimal the Company is proposing no change to Schedule 204 for 2016.

During the OSIP program year, the Company deferred approximately \$4.3 million, excluding interest, for the twelve months ended September 30, 2015. The deferral includes implementation costs for program development and administration, incentive payments, and meter costs. The total deferral balance also reflects offsetting credits for customer charges and an avoided energy value. In addition, a residual credit balance of approximately \$162,000 relating to 2014 program costs has been included in the balance that the Company is seeking to amortize in this filing.

The total amount requested to be amortized in 2016 is approximately the same as the \$4.3 million approved for collection in 2015 in Advice No. 14-012. Therefore the current rates in Schedule 204, which were set to collect approximately \$4.3 million annually beginning January 1, 2015, are appropriate to collect the new amortization amount for 2016. Attachment A provides a comparison of the Schedule 204 revenues for 2016 under present rates to the revenues for 2015. The Company proposes to leave the current Schedule 204 rates in effect for 2016 and proposes no change to the tariff at this time.

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<sup>1</sup> UM 1384(5) was filed on May 15, 2015, and is on the Public Meeting consent agenda for November 3, 2015.

<sup>2</sup> Advice No. 10-022 was approved at the December 28, 2010, Public Meeting. Advice No. 11-019 was approved at the December 20, 2011, Public Meeting. Advice No. 12-019 was approved at the January 29, 2013, Public Meeting. Advice No. 13-019 was approved at the Public Meeting on January 21, 2014; Advice No. 14-012 was approved at the Public Meeting on December 16, 2014.

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As previously stated by the Company, the earnings test set forth in ORS 757.259(5) is not applicable to the requested deferral amortization because the Company applied for deferral under ORS 757.365(1) or, in the alternative, ORS 469A.120,<sup>3</sup> neither of which subject deferral amortization to the three percent cap set forth in ORS 757.259(6). However, the requested deferral amortization is less than three percent of the Company's earnings, as required by ORS 757.259(6). Thus, while the Company takes the position that the costs associated with this mandatory program are not subject to the three percent cap on amortization of deferred costs under ORS 757.259(6), the deferral amortization is, in fact, less than three percent of the Company's earnings.


It is respectfully requested that all data requests regarding this matter be addressed to:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

All other inquiries may be directed to Erin Apperson, Manager, Regulatory Affairs, at (503) 813-6642.

Sincerely,

  
R. Bryce Dalley  
Vice President, Regulation

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<sup>3</sup> The Company also applied under the general deferral statute, ORS 757.259 in the event the Commission found that neither ORS 757.365 nor ORS 469A.120 provided grounds for deferral.

**PACIFIC POWER  
STATE OF OREGON  
OSIP Deferral Schedule 204  
Proposed Rates and Revenues  
Forecast 12 Months Ending December 31, 2016**

Description	Sch. No.	Forecast Energy	Proposed Schedule 204		2015	Change in
			Rates ¢/kWh	Revenues	Revenues	Revenues
Residential	4	5,283,997,430	0.035	\$1,849,399	\$1,838,572	\$10,827
Small General Service	23	1,149,043,206	0.033	\$379,184	\$369,978	\$9,206
General Service 31-200kW	28	2,026,407,738	0.034	\$688,979	\$684,766	\$4,213
General Service 201-999kW	30	1,306,641,889	0.032	\$418,125	\$429,785	-\$11,660
Agricultural Pumping Service	41	226,662,104	0.033	\$74,798	\$75,414	-\$616
Large General Service, Partial Requirements >=1,000kW	47	50,157,573	0.030	\$15,047	\$17,537	-\$2,490
Large General Service, >=1,000kW	48	3,036,760,047	0.030	\$911,028	\$914,022	-\$2,994
Outdoor Area Lighting Service	15	9,154,109	0.024	\$2,197	\$2,211	-\$14
Mercury Vapor Street Lighting Service	50	8,783,001	0.021	\$1,844	\$1,841	\$3
Street Lighting Service, Company-Owned System	51	19,673,713	0.034	\$6,689	\$6,568	\$121
Street Lighting Service, Company-Owned System	52	406,889	0.025	\$102	\$141	-\$39
Street Lighting Service, Consumer-Owned System	53	9,363,960	0.011	\$1,030	\$1,047	-\$17
Recreational Field Lighting	54	1,211,340	0.019	\$230	\$237	-\$7
<b>Total before Employee Discount</b>		<b>13,128,263,000</b>		<b>\$4,348,654</b>	<b>\$4,342,120</b>	<b>\$6,533</b>
Employee Discount		16,605,449	-0.009	-\$1,453	-\$1,444	-\$9
<b>TOTAL</b>		<b>13,128,263,000</b>		<b>\$4,347,201</b>	<b>\$4,340,676</b>	<b>\$6,525</b>
Schedule 47 Unscheduled kWh		2,050,352				
Total Forecast kWh		13,130,313,352				