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October 7, 2019

VIA ELECTRONIC FILING

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


Attn: Filing Center

RE: UM 1857–PacifiCorp’s Motion to Amend Deadlines in Stipulation

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket PacifiCorp’s Motion to Amend Deadlines in Stipulation.

If you have any questions about this filing, please contact Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Etta Lockey
Vice President, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1857

In the Matter of
PACIFICORP, d/b/a PACIFIC POWER,
Draft Storage Potential Evaluation.

PACIFICORP’S MOTION TO AMEND
DEADLINES IN STIPULATION

PacifiCorp d/b/a Pacific Power (PacifiCorp) files this Motion to Amend Deadlines in Stipulation in Docket UM 1857. PacifiCorp seeks to align the submission of its second compliance filing, including the newly estimated benefits and all costs associated with the Energy Storage Solution (ESS) pilot, with the filing of PacifiCorp’s Integrated Resource Plan (IRP). As a result, PacifiCorp seeks to file this second compliance filing on October 18, 2019 instead of October 14, 2019.

On July 18, 2018, PacifiCorp, the Staff of the Public Utility Commission of Oregon (Staff), and the Oregon Citizen’s Utility Board (CUB) filed a stipulation and supporting testimony after reaching an agreement on two energy storage project proposals and revisions to PacifiCorp’s storage potential evaluation methodology. On September 4, 2018, the Commission adopted the stipulation in Order No. 18-327.

The stipulation outlined future processes that the Parties agreed to complete. First, PacifiCorp agreed to file a plan to update its energy storage modeling capability (the Plan) to estimate all energy storage benefits expressed in Commission Nos. 16-504, 17-118, and 17-375 within 90 days of Commission approval of the stipulation.¹ Second, Staff agreed to

¹ Order No. 18-327, Appendix A at ¶3.

make best efforts to complete its review of the filing and to make a recommendation on approval at a regular public meeting within 90 days of PacifiCorp's filing.² Third, after gaining approval of the Plan, PacifiCorp agreed to implement the Plan and include the newly estimated benefits and costs associated with the ESS pilot in a second filing by June 3, 2019.³

PacifiCorp filed its plan on December 3, 2018 in this docket. On May 31, 2019, Judge Rowe granted a motion to extend the deadlines identified in the original filing. That ruling modified Order No. 18-327 to allow PacifiCorp to make its second compliance filing within 90 days of Commission action on its plan. On July 16, 2019 the Commission adopted Staff's recommendation to approve PacifiCorp's Energy Storage Potential Evaluation Plan.⁴ Under the May 31st ruling, PacifiCorp second compliance filing must now be filed on October 14, 2019.

PacifiCorp's second compliance filing with the newly estimated benefits is heavily tied to PacifiCorp's IRP, and these newly estimated benefits are in fact being filed as an appendix to PacifiCorp's 2019 IRP. Much of the data relied on in the second compliance filing will be included in the 2019 IRP, and as a result, PacifiCorp seeks to extend the deadline for this compliance filing by four days to October 18, 2019, so that the newly estimated benefits may be filed concurrently with the 2019 IRP.

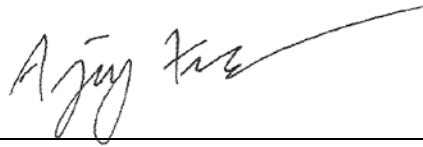
PacifiCorp has reached out to Staff and CUB and neither of the Parties oppose this motion.

² *Id.* at ¶5.

³ *Id.* at ¶6.

⁴ Order No. 19-242 (July 17, 2019).

Respectfully submitted this 7th day of October, 2019.

A handwritten signature in black ink that reads "Ajay Kumar". The signature is written in a cursive style with a long horizontal flourish extending to the right.

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