

September 14, 2020

VIA ELECTRONIC FILING

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

RE: UM ____—Application for Deferred Accounting Related to Wildfire Damage and Restoration Costs

PacifiCorp d/b/a Pacific Power submits for filing its Application for Deferred Accounting Related to Wildfire Damage and Restoration Costs.

PacifiCorp respectfully requests that all communications related to this filing be addressed to:

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
oregondockets@pacificorp.com

Matthew McVee
Chief Regulatory Counsel
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
matthew.mcvee@pacificorp.com

Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com

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

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

Sincerely,



Etta Lockey
Vice President, Regulation

Cc: Service List for docket UE 374

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Deferred Accounting Related to
Wildfire Damage and Restoration Costs

**APPLICATION FOR DEFERRED
ACCOUNTING**

I. INTRODUCTION

In accordance with Oregon Revised Statutes (ORS) 757.259 and Oregon Administrative Rules (OAR) 860-027-0300, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) applies to the Public Utility Commission of Oregon (Commission) for an order authorizing deferral of the incremental costs associated with restoring service to customers and repairing, replacing, and restoring damaged utility facilities due to wildfires in Oregon (Deferred Amount). PacifiCorp seeks authorization to defer the recovery of costs incurred from the date of this application for a 12-month period ending September 14, 2021. PacifiCorp will seek amortization of the Deferred Amount in a future commission proceeding.¹

II. NOTICE

Communications regarding this application should be addressed to:

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: oregondockets@pacificorp.com

Matthew D. McVee
Chief Regulatory Counsel
PacifiCorp
825 NE Multnomah Street, Suite 1800
Portland, OR 97232
Email: matthew.mcvee@pacificorp.com

¹ In accordance with OAR 860-027-0300, PacifiCorp will file for reauthorization of the deferral, as necessary.

In addition, the company requests that all data requests regarding this application be sent to the following:

By email (preferred): datarequest@pacificorp.com

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

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

I. OAR 860-027-0300(3) REQUIREMENTS

As required by OAR 860-027-0300(3) and (4), PacifiCorp provides the following:

A. Background Description

At the beginning of September 2020, a number of devastating wildfires spread across Oregon causing widespread and extensive damage to PacifiCorp's transmission and distribution facilities and resulting in loss of power to customers. PacifiCorp is coordinating with state and local officials to gain access and repair damaged structures to restore service to its customers in those areas affected. PacifiCorp expects to incur significant costs restoring power to customers and repairing, restoring, and replacing damaged equipment. Areas affected by the fires include the majority of western Oregon, specific counties particularly impacted in which the Company provides service include Josephine, Jackson, Douglas, Lane, Linn, Lincoln and Marion Counties. These areas have extensive damage to transmission and distribution lines that will require immediate reconstruction of burnt poles and replacement of conductors to restore vital electric service to communities in PacifiCorp's service territory. Over 500 field resources have been deployed to work with public safety partners responding to the containment and reconstruction and restoration of communities. While assessment is

still underway in many of the areas, the Company's current information has identified at least 600 poles (both distribution and transmission), hundreds of crossarms, dozens of service transformers and more than 20 miles of conductor will require replacement.

B. Reasons for Deferral

As discussed above, PacifiCorp requests authorization to defer the incremental costs associated with restoring service to customers and repairing, replacing, and restoring utility facilities damaged by the wildfires in Oregon. ORS 757.259(2)(e) allows the deferral of identifiable utility expenses in order to minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately the costs borne and benefits received by customers.

All costs are related to incremental costs to restore service to customers and repair, replace, or restore facilities damaged by the wildfire. At this time, some of the wildfires are not yet contained. Due to the ongoing threat to the Company's facilities and the extensive and widespread damage that has already occurred, the Company has not been able to access all areas impacted by the fires. While still assessing the extent of damage, PacifiCorp anticipates the capital and operations and maintenance costs will exceed \$10 million.

This deferral will appropriately align costs borne by and benefits received by customers. The potential magnitude of wildfire damage and restoration costs will significantly exceed normal costs anticipated by PacifiCorp and included in its retail rates, and far exceed the reasonable business risk associated with outage restoration.

D. Proposed Accounting

If this application is approved, PacifiCorp will record deferred amounts by debiting Federal Energy Regulatory Commission (FERC) Account 182.3-Other Regulatory Assets and crediting the incremental operations and maintenance expense to various FERC

Accounts including primarily 593.0 Maintenance Overhead Lines (distribution).and 571.0- Maintenance Overhead Lines (transmission). Deferrals of capital related revenue requirement will be credited to Operating Revenues (FERC Accounts 440, 442 and 444).

If this application is denied, the costs will remain in the various FERC Accounts.

E. Notice

A copy of the Notice of Application is included as Exhibit A. This notice will be served to the service list in docket UE 374.

F. Description and Explanation of Entries in the Deferred Account to Date

Not applicable.

III. CONCLUSION

PacifiCorp respectfully requests that, in accordance with ORS 757.259(2)(e), the Commission authorize the Company to defer the costs described in this application for the 12-month period beginning September 14, 2020. Recovery of the deferred wildfire-related costs will only be authorized for recovery through a subsequent application, general rate case, or through other appropriate filings as authorized by the commission.

Respectfully submitted this 14th day of September, 2020.


By: 
Matthew D. McVee
Chief Regulatory Counsel
PacifiCorp d/b/a Pacific Power

EXHIBIT A

EXHIBIT A

NOTICE

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Deferred Accounting Related to
Wildfire Damage and Restoration Costs

**NOTICE OF
APPLICATION FOR
DEFERRED ACCOUNTING**

On September 14, 2020, PacifiCorp d/b/a Pacific Power filed an application with the Public Utility Commission of Oregon (Commission) for an order authorizing the use of deferred accounting for the incremental costs associated with restoring service to customers and repairing, replacing, and restoring damaged utility facilities due to wildfires in Oregon. The application will not result in a change in rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding. To obtain a copy of the application, contact the following:

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
E-mail: oregondockets@pacificorp.com

Any person may submit written comments to the Commission regarding the application with 25 days of the filing of the application.

Respectfully submitted on September 14, 2020.

By:



Matthew D. McVee
Chief Regulatory Counsel
PacifiCorp d/b/a Pacific Power

CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of PacifiCorp's **Application for Deferred Accounting Related to Wildfire Damage and Restoration Costs** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

Service List UE 374

BILL EHRLICH (C) (HC) TESLA 3500 DEER CREEK RD PALO ALTO CA 94304 wehrlich@tesla.com	STEVE ELZINGA (C) CHARGEPOINT INC 693 CHEMEKETA ST NE SALEM OR 97301 steve@shermlaw.com
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CALPINE SOLUTIONS	
GREGORY M. ADAMS (C) RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE ID 83702 greg@richardsonadams.com	GREG BASS CALPINE ENERGY SOLUTIONS, LLC 401 WEST A ST, STE 500 SAN DIEGO CA 92101 greg.bass@calpinesolutions.com
KEVIN HIGGINS (C) ENERGY STRATEGIES LLC 215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com	

CHARGEPOINT	
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OREGON CITIZENS UTILITY BOARD	
OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 dockets@oregoncub.org	MICHAEL GOETZ (C) (HC) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 mike@oregoncub.org
ROBERT JENKS (C) (HC) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 bob@oregoncub.org	
FRED MEYER	
JUSTIN BIEBER (C) FRED MEYER/ENERGY STRATEGIES LLC 215 SOUTH STATE STREET, STE 200 SALT LAKE CITY UT 84111 jbieber@energystrat.com	KURT J BOEHM (C) BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com
JODY KYLER COHN (C) BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI OH 45202 jkylerecohn@bkllawfirm.com	
KWUA	
PAUL S SIMMONS (C) (HC) SOMACH SIMMONS & DUNN, PC 500 CAPITOL MALL, STE 1000 SACRAMENTO CA 95814 psimmons@somachlaw.com	
PACIFICORP	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com	MATTHEW MCVEE (C) PACIFICORP 825 NE MULTNOMAH ST STE 2000 PORTLAND, OR 97232 matthew.mcvee@pacificorp.com

<p>ETTA LOCKEY (C) PACIFIC POWER 825 NE MULTNOMAH ST., STE 2000 PORTLAND OR 97232 etta.lockey@pacificorp.com</p>	
<p>SBUA</p>	
<p>WILLIAM STEELE (C) BILL STEELE AND ASSOCIATES, LLC PO BOX 631151 HIGHLANDS RANCH CO 80164 wa.steele@hotmail.com</p>	<p>DIANE HENKELS (C) SMALL BUSINESS UTILITY ADVOCATES 621 SW MORRISON ST. STE 1025 PORTLAND OR 97205 diane@utilityadvocates.org</p>
<p>SIERRA CLUB</p>	
<p>ANA BOYD (C) (HC) SIERRA CLUB 2101 WEBSTER ST STE 1300 OAKLAND CA 94612 ana.boyd@sierraclub.org</p>	<p>GLORIA D SMITH (C) (HC) SIERRA CLUB LAW PROGRAM 2101 WEBSTER ST STE 1300 OAKLAND CA 94612 gloria.smith@sierraclub.org</p>
<p>CHRISTOPHER M BZDOK (C) (HC) OLSON BZDOK & HOWARD 420 EAST FRONT ST TRAVERSE CITY MI 49686 chris@envlaw.com</p>	
<p>STAFF</p>	
<p>MARIANNE GARDNER (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308-1088 marianne.gardner@state.or.us</p>	<p>SOMMER MOSER (C) PUC STAFF - DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM, OR 97301 sommer.moser@doj.state.or.us</p>
<p>TESLA INC</p>	
<p>KEVIN AUERBACHER (C) (HC) TESLA, INC. 601 13TH ST NW, 9TH FL NORTH WASHINGTON DC 20005 kauerbacher@tesla.com</p>	<p>JOHN DUNBAR (C) (HC) DUNBAR LAW LLC 621 SW MORRISON STREET STE 1025 PORTLAND OR 97205 jdunbar@dunbarlawllc.com</p>
<p>VITESSE LLC</p>	
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IRION A SANGER (C) SANGER LAW PC 1041 SE 58TH PLACE PORTLAND OR 97215 irion@sanger-law.com	
WALMART	
VICKI M BALDWIN (C) PARSONS BEHLE & LATIMER 201 S MAIN ST STE 1800 SALT LAKE CITY UT 84111 vbaldwin@parsonsbehle.com	STEVE W CHRISS (C) WAL-MART STORES, INC. 2001 SE 10TH ST BENTONVILLE AR 72716-0550 stephen.chriss@wal-mart.com

Dated this 14th day of September, 2020.



Katie Savarin
Coordinator, Regulatory Operations