



825 NE Multnomah Street, Suite 2000  
Portland, Oregon 97232

October 4, 2022

***VIA ELECTRONIC FILING***

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

**Re: UM 2116(2)—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](mailto:oregondockets@pacificorp.com)

Carla Scarsella  
Deputy General Counsel  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[Carla.scarsella@pacificorp.com](mailto:Carla.scarsella@pacificorp.com)

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

By email (preferred): [datarequest@pacificorp.com](mailto: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 Jennifer Angell, Regulatory Project Manager, at (503) 331-4414.

Sincerely,

  
Shelley McCoy  
Director, Regulation

Enclosure

Cc: Service List for docket UE 399

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2116(2)**

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 reauthorizing deferral of the incremental costs associated with restoring service to customers and repairing, replacing, and restoring damaged utility facilities due to the 2020 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 beginning October 4, 2022. PacifiCorp will seek amortization of the Deferred Amount in a future commission proceeding.<sup>1</sup>

**II. CONTACT INFORMATION**

Communications regarding this application should be addressed to:

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

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Deputy General Counsel  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
Email: [carla.scarsella@pacificorp.com](mailto:carla.scarsella@pacificorp.com)

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<sup>1</sup> 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](mailto: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.

### **III. BACKGROUND**

At the beginning of September 2020, several devastating wildfires spread across western Oregon causing widespread and extensive damage to PacifiCorp's transmission and distribution facilities and resulting in loss of power to customers. Counties within the Company's service area that were affected by the fires included Josephine, Jackson, Douglas, Lane, Linn, Lincoln, and Marion Counties. These areas had extensive damage to transmission and distribution lines that required the immediate reconstruction of burnt poles and replacement of conductors to restore vital electric service to communities in PacifiCorp's service territory.

On September 14, 2020, PacifiCorp filed an application for deferral of the incremental costs associated with restoring service to customers and repairing, replacing, and restoring utility facilities damaged by the 2020 wildfires in Oregon. The Commission approved the deferral application for the 12-month period starting September 14, 2020, in Order No. 22-154 issued on May 9, 2022. On October 4, 2021, the Company filed an application for reauthorization to defer the incremental costs associated with restoring service to customers and repairing, replacing, and restoring utility facilities damaged by the

2020 wildfires in Oregon for the 12 months beginning October 4, 2021. The Commission approved the application for reauthorization for the 12-month period starting October 4, 2021, in Order No. 22-140 issued on May 9, 2022.

PacifiCorp respectfully requests reauthorization for deferred accounting of the Company’s incremental wildfire damage and restoration costs associated with the 2020 wildfires for the 12-month period beginning October 4, 2022.

**IV. DEFERRAL OF COSTS**

PacifiCorp respectfully requests reauthorization under ORS 757.259(2)(e) to continue deferral of the incremental costs associated with restoring service to customers and repairing, replacing, and restoring utility facilities damaged by the 2020 wildfires in Oregon.

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

**A. Description of Utility Expense**

PacifiCorp proposes to continue to maintain a balancing account to record all incremental costs related to the restoration of service to customers and the repair, replacement, or restoration of facilities damaged by the 2020 wildfires in Oregon. The following table provides a high-level summary of the benefits and resiliency efforts:

<b>District</b>	<b>WF Rebuild Project</b>	<b>Benefits</b>
<b>Medford</b>	Almeda	Restore services to customers in Talent, Phoenix, Ashland and Medford and address distribution tree removal.
<b>Medford</b>	S. Obenchain	Restore transmission on Line 19 for Prospect Hydro, and to customers in Shady Cove and Butte Falls. Address transmission rights of way vegetation and distribution tree removal.
<b>Lincoln City</b>	Echo Mountain	Restore transmission redundancy on Van Duzer lines, address vegetation management along transmission right of way and restore customers in Otis and Neetsu and address distribution tree removal.

<b>Roseburg</b>	Archie Creek	Restore Line 46 and Line 39 transmission in support of Umpqua hydro projects, address long-term vegetation management and tree removal for both rebuild and future asset protection, procure pre-wrapped Genies fire wrapped poles for Line 39, access management and erosion control for improved access.
<b>Stayton</b>	Beachie Creek	Restore customers on the distribution system in Mehama, Mill City, Gates, and Lyons. Address vegetation removal in support of rebuild efforts.
<b>Grants Pass</b>	Slater (Oregon)	Restore transmission on Line 33 in Oregon. Restore distribution service to customers in Takelma and O'Brien.
<b>Klamath Falls</b>	Two Four Two Fire	Restore distribution service to customers in Chiloquin and address vegetation along both distribution and transmission right of way.

Of the work noted in the table above, vegetation management (including environmental cultural studies) remains for the Archie Creek and Two Four Two rebuild projects. Ongoing service restoration will continue in all rebuild project locations as customers continue to rebuild homes and businesses that were destroyed. This work is anticipated to continue through 2023.

**B. Reason for Deferral**

ORS 757.259(2)(e) allows the deferral of identifiable utility expenses to minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately the costs borne by and benefits received by customers. In this application, PacifiCorp seeks reauthorization to defer the Deferred Amount to match appropriately the costs borne by, and benefits received by customers.

**C. 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.

**D. Estimate of Amounts**

PacifiCorp has incurred approximately \$189 million in incremental costs associated with restoring service to customers and repairing, replacing, and restoring damaged utility facilities due to the 2020 wildfires in Oregon during the 12-month period beginning September 14, 2020. The following table reflects the incremental costs the Company forecasts it will incur through calendar year 2023. In this Application, PacifiCorp is seeking authorization to defer costs from the date of filing for a 12-month period and will file for reauthorization in 2023.

<b>Forecasted Costs Through CY 2023</b>		
<b>Oct. – Dec. 2022</b>	<b>CY 2023</b>	<b>Total</b>
\$985,189	\$1,463,648	\$2,448,838

**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 399.

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

A description and explanation of the entries in this deferred account is provided in the Description of Utility Expense section.

**G. Reason for Continuation of Deferred Accounting**


The Company’s efforts to repair, replace, and restore utility facilities damaged by the 2020 wildfires is ongoing. As discussed in this application, continuation of this deferral is

necessary to track the ongoing incremental costs associated with restoring service to customers and repairing, replacing, and restoring utility facilities.

## V. CONCLUSION

PacifiCorp respectfully requests that, in accordance with ORS 757.259(2)(e), the Commission reauthorize the Company to defer the costs described in this application for the 12-month period beginning October 4, 2022. 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 4<sup>th</sup> day of October 2022.

By:   
Carla Scarsella  
Deputy General Counsel  
PacifiCorp d/b/a Pacific Power

## **EXHIBIT A**



**EXHIBIT A**

**NOTICE**

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2116(2)**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Deferred Accounting Related to  
Wildfire Damage and Restoration Costs

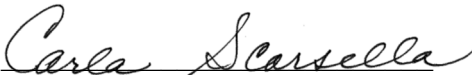
**NOTICE OF  
APPLICATION FOR  
DEFERRED ACCOUNTING**

On October 4, 2022, PacifiCorp d/b/a Pacific Power filed an application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing 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 the 2020 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](mailto: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 October 4, 2022.

By:   
Carla Scarsella  
Deputy General 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 399

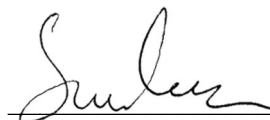
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<b>WALMART</b>	
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ALEX KRONAUER (C) WALMART <a href="mailto:alex.kronauer@walmart.com">alex.kronauer@walmart.com</a>	

Dated this 4<sup>th</sup> day of October 2022.




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Santiago Gutierrez  
Coordinator, Regulatory Operations