

October 20, 2021

VIA ELECTRONIC FILING

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

RE: UM _____ — PacifiCorp's Application for Deferred Accounting for Transportation Electrification Pilots

Pursuant to ORS 757.259(2)(e), OAR 860-027-0300, and Commission Order No. 21-259, PacifiCorp d/b/a Pacific Power (PacifiCorp) submits for filing its application to establish and maintain a balancing account to record the deferral of program costs and revenues related to PacifiCorp's Transportation Electrification Pilots.

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

Nate Larsen
Associate Attorney
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: nate.larsen@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,



Shelley McCoy
Director, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred Accounting
for a Balancing Account Related to PacifiCorp's
Transportation Electrification Pilots.

**APPLICATION FOR DEFERRED
ACCOUNTING**

I. INTRODUCTION

In accordance with Oregon Revised Statutes (ORS) 757.259(2)(e) and Oregon Administrative Rules (OAR) 860-027-0300, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits this application to the Public Utility Commission of Oregon (Commission) for an order authorizing the Company to establish and maintain a balancing account to record the deferral of program costs and revenues related to PacifiCorp's Transportation Electrification Residential Charging Pilot, Transportation Electrification Nonresidential Charging Pilot, and Transportation Electrification Outreach and Education Pilot (TE Pilots). PacifiCorp proposes to record in the balancing account the costs associated with the TE Pilots as described in the Company's application filed per OAR 860-087-0030 in Advice No. 21-016 (docket ADV 1288) and approved by the Commission in a public meeting on August 24, 2021.¹ In addition, PacifiCorp will record in the balancing account the revenue collected from a tariff rider recovering the cost of the TE Pilots and the revenue from the sale of Oregon Clean Fuels Program credits related to the TE Pilots.

¹ See Docket No. ADV 1288, Letter from Public Utility Commission of Oregon to PacifiCorp, *RE: Advice No. 21-016*, August 24, 2021 (memorializing Commission approval of PacifiCorp's TE Pilots).

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

Nate Larsen
Associate Attorney
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: nate.larsen@pacificorp.com

In addition, PacifiCorp 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, Regulatory Affairs, at (503) 813-5934.

III. BACKGROUND

On June 30, 2021, PacifiCorp filed Advice Letter 21-016 requesting approval of the TE Pilots, with supplemental filings proposing minor revisions filed on July 20, 2021 and August 20, 2021. The TE Pilots consist of three pilot programs: the Transportation Electrification Residential Charging Pilot (Schedule 117), the Transportation Electrification Nonresidential Charging Pilot (Schedule 118), and the Transportation Electrification Outreach and Education Pilot. The Commission adopted Commission Staff's recommendation to approve the Company's TE Pilots at a public meeting on August 24, 2021.

In this application, PacifiCorp seeks Commission authorization to establish and maintain a balancing account to record the deferral of program costs and revenues related to

PacifiCorp’s TE Pilots. PacifiCorp will record in the balancing account the revenue collected from a tariff rider (once approved), and the revenue from the sale of Oregon Clean Fuels Program credits related to the TE Pilots.

In the application for each of the three pilot programs, PacifiCorp proposed cost recovery “through a general rate case or a rate rider specific to transportation electrification programs.”

The Company files this deferral application to obtain approval for the deferred accounting necessary to establish a balancing account to enable the use of a cost-of-service automatic adjustment clause.

IV. DEFERRAL OF COSTS

PacifiCorp respectfully requests authorization under ORS 757.259(2)(e) to establish and maintain a balancing account to record costs and credits related to the Company’s TE Pilots, along with related interest at the Modified Blended Treasury Rate, consistent with the treatment of interest rates described in Order No. 08-263 as modified by Order No. 10-279.

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

A. Description of Utility Expense

PacifiCorp proposes to establish and maintain a balancing account to record the costs related to its TE Pilots, the collection of cost recovery through a rate rider, the receipt of monetized credits from the Oregon Clean Fuels Program, and related interest. Tracking the costs and revenues of the TE Pilots in a balancing account will enable PacifiCorp to accurately incorporate program costs into rates or employ a rate schedule with a cost-of-service automatic adjustment clause, ensuring that PacifiCorp will not under- or over-collect amounts related to the TE Pilots.

PacifiCorp anticipates incurring the following costs related to the TE Pilots:

- Customer incentives,
- Program administration,
- Outreach & marketing,
- Evaluation,
- Decision making support, Technical assistance and EV experiences, and
- Planning and studies.

PacifiCorp anticipates that it will begin to incur costs in October 2021, which costs will continue to accrue through three program years of the TE Pilots.

B. Reasons for Deferral

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. In this application PacifiCorp seeks the use of a balancing account to match the costs borne and benefits received by customers.

C. Proposed Accounting

If this application is approved, PacifiCorp will record deferred expense amounts arising from the TE Pilots by crediting FERC account 906, Customer Service and Informational Expenses, and debiting the TE Pilots balancing account, in FERC Account 182.3, Other Regulatory Assets. The deferral balance will be reduced monthly by the amount collected through rates or the tariff rider. In addition, revenues from monetized credits from the Oregon Clean Fuels Program related to the TE Pilots will be credited to the proposed TE Pilots balancing account. A carrying charge calculated at the current Modified

Blended Treasury rate will be recorded each month on the deferral balance. If this application is denied, the cost of the TE Pilots will remain in FERC account 906 and the revenues from monetized credits from the Oregon Clean Fuels Program related to the TE Pilots will be recorded in FERC account 456, Other Electric Revenues.

D. Estimate of Amounts

As detailed in the applications for its TE Pilots, PacifiCorp expects to incur a total of \$6.83 million over the three year life of the TE Pilots, including \$2.27 million in Year 1, \$2.25 million in Year 2, and \$2.32 million in Year 3. Those costs are broken out by pilot program by year in the table below.

PacifiCorp TE Pilots – Total Budget

	Year 1	Year 2	Year 3	Total
Transportation Electrification Residential Charging Pilot	\$796,252	\$877,828	\$941,364	\$2,615,444
Transportation Electrification Nonresidential Charging Pilot	\$629,900	\$684,900	\$724,500	\$2,039,300
Transportation Electrification Outreach & Education Pilot	\$840,000	\$682,500	\$656,250	\$2,178,750
Total	\$2,266,152	\$2,245,228	\$2,322,114	\$6,833,494

As mentioned above, deferred costs associated with the TE Pilots will be recorded in the proposed balancing account along with interest calculated at the Modified Blended Treasury Rate and will be offset by the amount collected for the TE Pilots through rates or the tariff rider. In addition, revenues collected from monetized credits from the Oregon Clean Fuel Program will be credited to the proposed balancing account. Generally, it is expected that the balancing account will zero out over time.

E. Notice

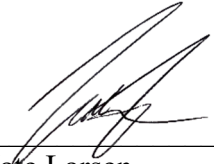
A copy of the Notice of Application and a list of persons served with the notice are attached as Exhibit A to this application.

V. CONCLUSION

PacifiCorp respectfully requests that, in accordance with ORS 757.259(2)(e), the Commission authorize the Company to establish and maintain a balancing account related to PacifiCorp's TE Pilots to record costs, amortization through a future cost recovery mechanism, revenues from the sale of Oregon Clean Fuel Program credits and interest.

Respectfully submitted this 20th day of October, 2021

By:



Nate Larsen
Associate Attorney
PacifiCorp d/b/a Pacific Power

EXHIBIT A

NOTICE

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred Accounting
for a Balancing Account Related to PacifiCorp's
Transportation Electrification Pilots.

**NOTICE OF
APPLICATION FOR
AUTHORIZATION OF DEFERRED
ACCOUNTING**


On October 20, 2021, PacifiCorp d/b/a Pacific Power (PacifiCorp) filed an application with the Public Utility Commission of Oregon (Commission) for an order authorizing deferral of program costs and revenues related to PacifiCorp's Transportation Electrification Residential Charging Pilot, Transportation Electrification Nonresidential Charging Pilot, and Transportation Electrification Outreach and Education Pilot. PacifiCorp respectfully requests authorization for 12 months beginning October 20, 2021. To obtain a copy of the application, contact the following:

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

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

Respectfully submitted on October 20, 2021.

By:



Nate Larsen
Associate Attorney
PacifiCorp d/b/a Pacific Power

CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of PacifiCorp's **NOTICE OF APPLICATION FOR AUTHORIZATION OF DEFERRED ACCOUNTING** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

Service List UE 374

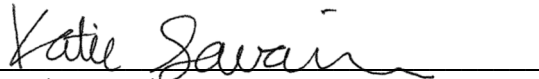
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Dated this 20th day of October, 2021.


Katie Savarin
Coordinator, Regulatory Operations