

January 7, 2022

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 Approval of Deferred Accounting for Costs and Revenues Associated with the Transportation Electrification Charge in House Bill 2165

PacifiCorp d/b/a Pacific Power submits for filing its Application for Approval of Deferred Accounting for Costs and Revenues Associated with the Transportation Electrification Charge in House Bill 2165.

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

Carla Scarsella
Deputy General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: carla.scarsella@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 Street, 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 Costs and Revenues Associated
with the Transportation Electrification Charge
in House Bill 2165

**APPLICATION FOR DEFERRED
ACCOUNTING**

I. INTRODUCTION

In accordance with Oregon Revised Statutes (ORS) 757.259(2)(e) and Oregon Administrative Rule (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 deferred accounting to track the costs and revenues associated with the Transportation Electrification (TE) charge established by House Bill (HB) 2165. The TE charge was approved by the Commission effective January 1, 2022 and is collected through the System Benefits Charge, Schedule 291.¹

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

Carla Scarsella
Deputy General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: carla.scarsella@pacificorp.com

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

¹ See PacifiCorp Advice Letter 21-022 filed November 15, 2021, effective January 1, 2022.

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, Regulatory Affairs Manager, at (503) 813-5934.

III. BACKGROUND AND SUMMARY OF REQUEST

In May 2021, the Governor of Oregon signed into law HB 2165. Section 2 (2) of the bill states:

An electric company that makes sales of electricity to 25,000 or more retail electricity consumers in this state shall collect, through monthly meter charges, an amount from each retail electricity consumer served through the distribution system owned and operated by the electric company, regardless of whether the retail electricity consumer purchases the electricity from the electric company. The total amounts collected under this section must be set to one quarter of one percent of the total revenues collected by the electric company from all retail electricity consumers

The law went into effect on January 1, 2022. On November 15, 2021, PacifiCorp filed Advice Letter 21-022 to begin collecting the TE charge through the System Benefits Charge, Schedule 291, effective January 1, 2022. The Commission approved the Company's filing on December 28, 2021.

PacifiCorp requests authorization to defer certain costs and revenues associated with implementation and administration of HB 2165 for the 12-month period beginning January 7, 2022.

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

A. Description of Utility Expense

HB 2165 Section 2 requires that the total amounts collected under this law be set to one quarter of one percent of the total revenues collected by the electric company from all

retail electricity consumers. Section 3 requires that the funds collected must be expended by the electric company to support and integrate transportation electrification and must be consistent with a budget approved by the Commission. Section 3 also requires that expenditures made by an electric company must be made on elements contained within the electric company's transportation electrification plan accepted by the commission pursuant to ORS 757.357.

B. Reasons for Deferral

As discussed above, PacifiCorp requests authorization to defer certain costs and revenues associated with implementing and administering the TE charge required by HB 2165. 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. Commission approval of PacifiCorp's application will support the use of an automatic adjustment clause and associated balancing account to track the costs and revenues from the program separate from PacifiCorp's other costs and revenues. Granting this Application will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers.

PacifiCorp's application is consistent with the Commission's previous approval of deferred accounting applications.

C. Proposed Accounting

If this application is approved, PacifiCorp proposes to record deferred amounts to Federal Energy Regulatory Commission account 182.3, Other Regulatory Assets. This account will accrue interest at the Commission-authorized rate for deferred accounts.

D. Estimate of Amounts

The TE charge approved in Advice Letter 21-022 is designed to collect approximately \$3.1 million annually.

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

For the reasons set forth above, in accordance with ORS 757.259(2)(e), PacifiCorp respectfully requests authorization for a deferred account beginning on January 7, 2022, to track certain costs and revenues associated with HB 2165.

Respectfully submitted this 7th day of January, 2022.

By: 

Carla Scarsella
Deputy General Counsel

Attorney for PacifiCorp d/b/a Pacific Power

Exhibit A

Notice of Application

EXHIBIT A

NOTICE

**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 Costs and Revenues Associated
with the Transportation Electrification Charge
in House Bill 2165

**NOTICE OF
APPLICATION FOR DEFERRED
ACCOUNTING**

On January 7, 2022, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) filed an application with the Public Utility Commission of Oregon (Commission) for an order authorizing deferred accounting to track the costs and revenues associated with the Transportation Electrification charge established by House Bill 2165. The authorization will not authorize 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
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 January 7, 2022.

By:



Carla Scarsella
Deputy General Counsel

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

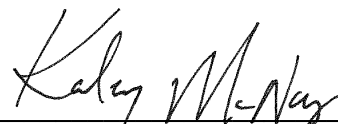
BILL EHRLICH (C) (HC) TESLA 3500 DEER CREEK RD PALO ALTO CA 94304 wehrlich@tesla.com	STEVE ELZINGA (C) CHARGEPOINT INC 693 CHEMEKETA ST NE SALEM OR 97301 steve@shermlaw.com
FRANCESCA WAHL (C) (HC) TESLA 6800 DUMBARTON CIRCLE FREMONT CA 94555 fwahl@tesla.com	LLOYD REED (C) (HC) REED CONSULTING 10025 HEATHERWOOD LANE HIGHLANDS RANCH CO 80126 lloyd.reed@lloydreedconsulting.com
CRYTAL RIVERA (C) (HC) SOMACH SIMMONS & DUNN 500 CAPITOL MALL STE 1000 SACRAMENTO CA 95814 crivera@somachlaw.com	PAUL S SIMMONS (C) SOMACH SIMMONS & DUNN, PC 500 CAPITOL MALL, STE 1000 SACRAMENTO CA 95814 psimmons@somachlaw.com
AWEC	
TYLER C PEPPLER (C) (HC) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com	BRENT COLEMAN (C) (HC) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 blc@dvclaw.com
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	
ALEXANDRA LEUMER (C) CHARGEPOINT alexandra.leumer@chargepoint.com	SCOTT DUNBAR (C) KEYES FOX & WIEDMAN LLP 1580 LINCOLN ST, STE 880 DENVER CO 80203 sdunbar@kfwlaw.com
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	
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
ETTA LOCKEY (C) PACIFIC POWER 825 NE MULTNOMAH ST., STE 2000 PORTLAND OR 97232 etta.lockey@pacificorp.com	

SBUA	
WILLIAM STEELE (C) BILL STEELE AND ASSOCIATES, LLC PO BOX 631151 HIGHLANDS RANCH CO 80164 wa.steele@hotmail.com	DIANE HENKELS (C) SMALL BUSINESS UTILITY ADVOCATES 621 SW MORRISON ST. STE 1025 PORTLAND OR 97205 diane@utilityadvocates.org
SIERRA CLUB	
ANA BOYD (C) (HC) SIERRA CLUB 2101 WEBSTER ST STE 1300 OAKLAND CA 94612 ana.boyd@sierraclub.org	GLORIA D SMITH (C) (HC) SIERRA CLUB LAW PROGRAM 2101 WEBSTER ST STE 1300 OAKLAND CA 94612 gloria.smith@sierraclub.org
CHRISTOPHER M BZDOK (C) (HC) OLSON BZDOK & HOWARD 420 EAST FRONT ST TRAVERSE CITY MI 49686 chris@envlaw.com	
STAFF	
MARIANNE GARDNER (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308-1088 marianne.gardner@puc.oregon.gov	SOMMER MOSER (C) PUC STAFF - DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM, OR 97301 sommer.moser@doj.state.or.us
TESLA INC	
KEVIN AUERBACHER (C) (HC) TESLA, INC. 601 13TH ST NW, 9TH FL NORTH WASHINGTON DC 20005 kauerbacher@tesla.com	JOHN DUNBAR (C) (HC) DUNBAR LAW LLC 621 SW MORRISON STREET STE 1025 PORTLAND OR 97205 jdunbar@dunbarlawllc.com
VITESSE LLC	
R BRYCE DALLEY (C) FACEBOOK INC 2400 S BERTSINGER RD RIDGEFIELD WA 98642 rbd@fb.com	LIZ FERRELL (C) FACEBOOK, INC. 1 HACKER WAY MENLO PARK CA 94205 eferrell@fb.com
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 7th day of January, 2022.



Kaley McNay
Senior Coordinator, Regulatory Operations