



825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

March 29, 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 Administrative Costs Associated with House Bill 2475 Energy Affordability Act**

PacifiCorp d/b/a Pacific Power submits for filing its Application for Approval of Deferred Accounting for Administrative Costs Associated with House Bill 2475 Energy Affordability Act.

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  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
Email: [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 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 Administrative Costs  
Associated with House Bill 2475 Energy  
Affordability Act

**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 incremental administrative costs associated with House Bill (HB) 2475 Energy Affordability Act. PacifiCorp will seek amortization for recovery of the deferred costs in a future Commission proceeding.

**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](mailto:oregondockets@pacificorp.com)

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

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

### **III. BACKGROUND AND SUMMARY OF REQUEST**

In May 2021, the Governor of Oregon signed into law HB 2475, the Energy Affordability Act. This bill amends ORS 757.230 (1) to provide that utilities may take into account the “differential energy burdens on low-income customers and other economic, social equity or environmental justice factors that affect affordability for certain classes of utility customers” when designing rates and provides utilities with the opportunity to offer a bill discount to income-qualified eligible residential customers. PacifiCorp plans to file a proposal for providing a low-income bill discount program to eligible residential customers in 2022.

In docket UM 2223, PacifiCorp filed for authorization to defer the incremental costs and revenues associated with implementation and administration of HB 2475. On March 22, 2022, in Order No. 22-094, the Commission adopted staff’s proposal to approve the Company’s deferral application for the costs and revenues associated with the low-income bill discount program but required the Company to file a new deferral application, in a separate docket, for incremental administration costs incurred after March 22, 2022. Incremental administrative costs incurred prior to March 23, 2022, will be included with the costs deferred in UM 2223. PacifiCorp is filing this deferral application for incremental administrative costs incurred beginning on March 29, 2022.

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

##### **A. Description of Utility Expense**

PacifiCorp plans to file a proposal for providing a low-income bill discount to eligible residential customers in 2022. This deferral application requests authorization to track the incremental administrative costs, including marketing costs, incurred beginning on March 29, 2022.

##### **B. Reasons for Deferral**

As discussed above, PacifiCorp requests authorization to defer the incremental administrative costs to implement and administer the low-income bill discount program. 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 allow the Company to track the incremental administrative costs for 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 Modified Blended Treasury Rate, consistent with the costs and revenues deferred in UM 2223.

**D. Estimate of Amounts**

PacifiCorp is currently working on the design of the low-income bill assistance program and developing an administrative budget. An estimate of the total expected deferral for administrative costs is not known at this 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**

For the reasons set forth above, in accordance with ORS 757.259(2)(e), PacifiCorp respectfully requests authorization for a deferred account beginning on March 29, 2022, to track the incremental administrative costs associated with HB 2475.

Respectfully submitted this 29<sup>th</sup> day of March, 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 Administrative Costs  
Associated with House Bill 2475 Energy  
Affordability Act


**NOTICE OF  
APPLICATION FOR DEFERRED  
ACCOUNTING**

On March 29, 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 incremental administrative costs associated with House Bill 2475 Energy Affordability Act. 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](mailto: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 March 29, 2022.

By:   
Carla Scarsella  
Deputy General Counsel