

March 6, 2024

VIA ELECTRONIC FILING

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

Re: UE 433, UM 2116, UM 2220, UM 2161—PacifiCorp's Motion to Consolidate

PacifiCorp d/b/a Pacific Power submits for filing its Motion to Consolidate in the above-referenced dockets.

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

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 433, UM 2116, UM 2220, UM 2161

In the Matter of PACIFICORP d/b/a PACIFIC POWER, Application for a General Rate Revision
In the Matter of PACIFICORP d/b/a PACIFIC POWER, Deferred Accounting Related to Wildfire Damage and Restoration Costs
In the Matter of PACIFICORP d/b/a PACIFIC POWER, Deferred Accounting for Operating Costs and Capital Investments to Implement the Company’s Distribution System Plan.
In the Matter of PACIFICORP d/b/a PACIFIC POWER, Application for Approval of Deferred Accounting of Deer Creek Mine Royalty Payment Costs.

MOTION TO CONSOLIDATE

I. INTRODUCTION

In accordance with OAR 860-001-0600, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) respectfully requests a ruling from the Public Utility Commission of Oregon (Commission) consolidating the deferral applications identified below with PacifiCorp’s recently filed general rate case, docket UE 433 (2025 Rate Case) in order to determine the appropriate ratemaking treatment for these deferrals.

II. ARGUMENT

On February 14, 2024, PacifiCorp filed an application for a general rate revision, and through that filing has identified three deferrals for which the Company is seeking to consolidate into that proceeding. By consolidation, PacifiCorp is seeking to determine ratemaking treatment for these open deferral applications.¹ PacifiCorp has identified the following deferrals for which the Company seeks ratemaking treatment:

- Docket UM 2116, Deferred Accounting Related to Wildfire Damage and Restoration Costs;²
- Docket UM 2220, Deferred Accounting for Operating Costs and Capital Investments to Implement the Company's Distribution System Plan;³ and
- Docket UM 2161, Deferred Accounting of Deer Creek Mine Royalty Payment Costs.⁴

Consolidation of these deferrals will promote judicial and administrative efficiency by allowing these proposals to be considered by the Commission for both the required prudence review and incorporated into the rate changes that will occur at the conclusion of the proceeding. The consolidation, consideration, and proposed amortization of these deferrals through the 2025 Rate Case is consistent with the requirements of Oregon law, which requires it to occur in a proceeding under ORS 757.210 that changes rates, and upon

¹ *In the Matter of PacifiCorp d/b/a Pacific Power, Application for a General Rate Revision*, Docket No. UE 433, Exhibit PAC/200, McVee/11-12 (Feb. 14, 2024). Additionally, the Company anticipates the Deer Creek Mine royalty payment is likely to occur in 2024 and has included the amount of deferred recovery in this rate case. See Exhibit PAC/1700, Cheung/32.

² *In the Matter of PacifiCorp dba Pacific Power Application Deferred Accounting Related to Wildfire Damage and Restoration Costs*, Docket No. UM 2116, Application for Reauthorization filed Oct. 4, 2022, and Oct. 4, 2023.

³ *In the Matter of PacifiCorp dba Pacific Power Application for Approval of Deferred Accounting for Approval of Deferred Accounting for Operating Costs and Capital Investments to Implement the Company's Distribution System Plan*, Docket No. UM 2220, Application for Reauthorization filed Jan. 3, 2023, and Jan. 3, 2024.

⁴ *In the Matter of PacifiCorp dba Pacific Power Application for Order Approving the Deferral of Costs Associated with Deer Creek Mine Royalty Payments*, Docket No. UM 2161, Application for Reauthorization filed March 6, 2024.

review of the utility’s earnings at the time of the amortization of the deferral.⁵ PacifiCorp’s 2025 Rate Case is a rate change proceeding under ORS 757.210, and a review of PacifiCorp’s earnings will occur during the pendency of this proceeding.⁶ Therefore, it is appropriate to consolidate and consider these deferrals in PacifiCorp’s 2025 Rate Case at this time.

The Commission has discretion to consolidate cases under OAR 860-001-0600. In the past, such as in the Company’s last rate case, docket UE 399, the Commission has exercised this discretion when consolidation was the most efficient and logical approach,⁷ and when consolidation would clarify the record and simplify resolution of cases.⁸ As described above, consolidation of these cases is efficient, logical, and would simplify the resolution of these cases.

III. CONCLUSION

To promote judicial and administrative efficiency, PacifiCorp respectfully requests that the Commission consolidate the requested deferral proceedings with PacifiCorp’s 2025 Rate Case.

⁵ ORS 757.259(5).

⁶ *In the Matter of PacifiCorp d/b/a Pacific Power, Application for a General Rate Revision*, Docket No. UE 433, Advice No. 24-001 (Feb. 14, 2024).

⁷ *In the Matter of PacifiCorp d/b/a Pacific Power, Application for a General Rate Revision*, Docket No. UE 399, Administrative Law Judge Ruling dated Apr. 11, 2022; *see also, In re Portland General Electric and In re PacifiCorp*, Docket Nos. UA 37 and UA 41, Order No. 92-557 (Apr. 16, 1992).

⁸ *In the Matter of the Petition of Idaho Power Company; Amortization in Rates of Certain Deferred Excess Net Power Supply Expenses*, Docket Nos. UE 123 and UE 131, Order No. 02-440 (July 8, 2002).

Respectfully submitted this 6th day of March, 2024.



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