

June 30, 2023

VIA ELECTRONIC FILINGPublic Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398**RE: Advice 23-015—Schedule 190—Wildfire Mitigation Plan Cost Recovery Adjustment**

In accordance with ORS 757.205, ORS 757.210, and OAR 860-022-0025 and -0030, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits for filing the following proposed tariff pages associated with Tariff P.U.C. OR No. 36 which sets forth all rates, tolls, charges, rules, and regulations applicable to electric service in Oregon. PacifiCorp submits this filing to update the rates in Schedule 190 – Wildfire Mitigation Plan Cost Recovery Adjustment and respectfully requests a November 5, 2023 rate effective date consistent with the terms of the Stipulation adopted in Order No. 23-173.¹

<u>Sheet No.</u>	<u>Tariff</u>	<u>Title</u>
Thirty-third Revision of Sheet No. INDEX-3	Index	Table of Contents - Schedules
First Revision of Sheet No. 190	Schedule 190	Wildfire Mitigation Plan Cost Recovery Adjustment

Background

On July 17, 2022, PacifiCorp filed an application for Approval of an Automatic Adjustment Clause for Recovery of Costs Associated with the Company's annual wildfire protection plans, which included recovery of wildfire mitigation costs included in the 2022 Wildfire Mitigation Plan (2022 WMP). On December 29, 2022, Staff of the Public Utility Commission of Oregon, the Alliance for Western Energy Consumers, and PacifiCorp filed a stipulation settling all issues in the case. On May 10, 2023, the Commission issued Order No. 23-173 adopting the stipulation. In compliance with the Order, PacifiCorp submitted a compliance filing implementing rates for the newly approved Wildfire Mitigation Plan Automatic Adjustment Clause (WMP AAC) (recovered through Schedule 190) on May 17, 2023, for rates effective May 24, 2023.

The approved stipulation anticipates PacifiCorp will submit its annual filing on July 1 with rates effective approximately 120 days after the filing. The stipulation further states that PacifiCorp

¹ Per formal rulemaking and OAR 860-300-0020, the Wildfire Protection Plan (WPP) is now referred to as the Wildfire Mitigation Plan (WMP). Accordingly, PacifiCorp proposes in this filing to update the name of the recovery tariff to refer to the Wildfire Mitigation Plan instead of the Wildfire Protection Plan.

will provide the following detail supporting information in the annual filing including, but not limited to, the following:²

- a. Detailed accounting comparing the amounts spent relative to its WMP budget;
- b. Invoice level data detailing non-labor operations and maintenance (O&M) using the same format as Staff Standard Data Request 57;
- c. A project-level itemized budget of WMP investments and costs in each annual filing; and,
- d. A detailed reconciliation between the budget and actual expenditure by project, in each annual filing.

Overview of Request

This is PacifiCorp's second filing requesting recovery through the WMP AAC. In PacifiCorp's first filing, the Commission approved a rate increase of \$19.9 million, effective May 24, 2023, for incremental O&M costs in its 2022 WMP. The first filing did not include recovery of capital costs. In this second filing, PacifiCorp seeks to recover the 2022 WMP outstanding deferral balance projected through October 2023, the incremental O&M costs included in its 2023 WMP as well as recovery of capital costs for WMP projects placed in service since December 16, 2022³ through May 31, 2023. As shown in Table 1 below, PacifiCorp seeks to recover \$47.4 million or an increase of \$25.8 million over the amount currently in rates.⁴

Table 1: Amounts for Recovery

	2023 WMP AAC	
	For Rates Effective Nov-2023	
	Total Company	Oregon Allocated
Incremental Capital Costs	22,156,530	8,721,806
Annual Revenue Requirement	2,410,305	942,580
2022 Outstanding Deferral Balance		27,903,607
2023 Incremental WMP O&M		18,586,716
Total 2023 WMP AAC		47,432,903

² In the Matter of PacifiCorp d/b/a Pacific Power, Application for Approval of an Automatic Adjustment Clause for Recovery of Costs Associated with the Company's Wildfire Protection Plan, Docket No. UE 307, Order No. 23-173, Appendix A at 6:3-11 (May 10, 2023).

³ The December 22, 2022 compliance filing, Advice Letter 22-017 for PacifiCorp's last General Rate Case (docket UE 399), included 2022 WMP capital projects placed in service through December 16, 2022. Refer to the declaration of Allen Berreth included in the GRC compliance filing for the projects placed in service through December 16, 2022. 2022 WMP capital projects placed in service after December 16, 2022, are included in this WMP AAC filing.

⁴ Due to an expected increase in load, the amount collected in rates through the current Schedule 190 is \$21.6 million under the forecast 2024 rate design test year.

This request is discussed in more detail below.

Discussion

2023 Wildfire Mitigation Plan

On December 29, 2022, PacifiCorp submitted its 2023 Wildfire Mitigation Plan (2023 WMP) in Docket UM 2207. On June 13, 2023, the Public Utility Commission of Oregon approved PacifiCorp's 2023 WMP. Tables 28 and 29 in the 2023 WMP⁵ include actual costs forecast through the remainder of 2022 as well as projected incremental capital and O&M costs for 2023 and future years. These tables have been recreated below as Table 2 and Table 3 with revised 2022 actuals and lines added to Table 3 to show the amount incremental to that in base rates.

Table 2: 2022 Actuals and Planned Incremental Wildfire Mitigation Capital Investment by Program Category (\$/millions)⁶

Program Category	2022 Actuals ⁷	2023	2024	2025	2026	2027	5 Year Total
Risk Modeling and Drivers	-	\$0.4	-	-	-	-	\$0.4
System Hardening	\$17.3	\$94.9	\$106.4	\$89.8	\$73.2	\$70.3	\$451.9
<i>Line Rebuild</i>	\$3.8	\$50.3	\$68.8	\$68.8	\$68.8	\$68.8	\$329.3
<i>System Automation</i>	\$2.7	\$8.8	\$10.5	\$7.4	\$2.7	-	\$32.1
<i>Fuse Replacement</i>	\$2.5	\$23.1	\$17.9	\$11.1	-	-	\$54.6
<i>Fault Indicators</i>	\$1.8	-	-	-	-	-	\$1.8
<i>System Allocated Transmission</i>	\$6.4	\$12.7	\$9.2	\$2.6	\$1.7	\$1.6	\$34.2
Situational Awareness	\$1.7	\$1.1	\$0.8	\$0.5	\$0.4	\$0.3	\$4.8
<i>Weather Station Installs</i>	\$1.5	\$0.9	\$0.6	\$0.2	\$0.2	\$0.1	\$3.5
<i>Fire Impact Modelling</i>	\$0.3	\$0.2	\$0.2	\$0.2	\$0.2	\$0.2	\$1.3
Field Operations & Work Practices	\$0.3	\$0.7	-	-	-	-	\$1.0
Public Safety Partner Coordination	\$0.0	\$1.3	-	-	-	-	\$1.3
Grand Total	\$19.3	\$98.5	\$107.2	\$90.3	\$73.6	\$70.6	\$460.5

⁵ See 2023 WMP at 133.

⁶ Adapted from Table 28 in the 2023 WMP. See 2023 WMP at 133.

⁷ 2022 actuals updated from the 2023 WMP prepared in early December of 2022 to include balance of year.

Table 3: 2022 Actuals and Planned Incremental Wildfire Mitigation Expense by Program Category (\$/millions)⁸

Program Category	2022 Actuals ⁹	2023	2024	2025	2026	2027	5 Year Total
Risk Modeling and Drivers	\$0.1	\$0.5	\$0.4	\$0.4	\$0.4	\$0.4	\$2.0
Inspection & Correction	\$0.4	\$0.8	\$0.8	\$0.8	\$0.8	\$0.8	\$4.1
Vegetation Management	\$24.9	\$27.9	\$23.8	\$24.8	\$24.3	\$24.0	\$124.9
Grid Hardening	\$0.1	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3	\$1.6
Situational Awareness	\$2.0	\$1.8	\$1.9	\$1.9	\$2.0	\$2.0	\$9.6
Field Operations & Work Practices	\$2.8	\$2.5	\$2.5	\$2.5	\$2.5	\$2.5	\$12.7
PSPS Program	\$2.3	\$2.2	\$1.8	\$1.3	\$0.8	\$0.5	\$6.5
Public Safety Partner Coordination	\$0.1	\$0.2	\$0.2	\$0.2	\$0.2	\$0.2	\$1.0
WMP Engagement Strategy	\$0.5	\$1.0	\$0.8	\$0.6	\$0.6	\$0.6	\$3.6
Industry Collaboration	\$0.0	\$0.1	\$0.1	\$0.1	\$0.1	\$0.1	\$0.3
Plan Monitoring & Implementation	\$0.8	\$0.8	\$0.8	\$0.8	\$0.8	\$0.8	\$3.8
Grand Total	\$34.0	\$38.2	\$33.3	\$33.7	\$32.7	\$32.1	\$169.9
Less: Amount Currently in Base Rates		-\$19.7					
2023 WMP O&M Incremental to Base Rates		\$18.5					

*Additional Information Supporting the Filing in Compliance with the Stipulation***1. Detailed accounting comparing the amounts spent in 2022 relative to the WMP budget approved in the 2022 WMP****Capital Investment**

Table 4 below outlines the incremental planned capital investment included in the approved 2022 WMP, actuals updated since preparation of the 2023 WMP, and a discussion on any variance between planned and actuals.

It is important to note that as the wildfire mitigation programs mature, so does the categorization of spend. Therefore, the categories of spend represented in Table 12 of the 2022 WMP¹⁰ may be different in the 2023 WMP and this filing. For example, in the 2022 WMP, the program category of “System Automation” accounted for all distribution and transmission spend related to reclosers, relays and fault indicators. However, in 2023, PacifiCorp has now split this category into “system automation,” “system allocated transmission” and “fault indicators” to provide more granular details and tracking. In evaluating any plan variance, the three previously mentioned categories should be summed for planned spend to be compared against “System

⁸ Adapted from Table 29 in the 2023 WMP. See 2023 WMP at 133.

⁹ 2022 actuals updated from the 2023 WMP prepared in early December of 2022 to include balance of year.

¹⁰ See 2022 WMP at 78.

Automation” in the 2022 WMP. Where appropriate, categorization changes are described in the discussion column of Table 4 below.

Table 4: 2022 WMP Planned and Actual Incremental Capital Spend by Program Category (\$/millions)

Program Category	2022 Plan ¹¹	2022 Actuals ¹²	Variance from Plan	Discussion
Risk Modeling and Drivers	-	-	-	N/A – No variance
System Hardening	\$16.8	\$17.3	\$0.5	Programs re-categorized to improve tracking and reporting. Delays experienced with line rebuilds due to resource and supply chain constraints. System Automation projects experienced higher than anticipated unit costs.
<i>Line Rebuild</i>	\$5.7	\$3.8	(\$1.9)	
<i>System Automation</i>	\$8.6	\$2.7	(\$5.9)	
<i>Fuse Replacement</i>	\$2.5	\$2.5	-	
<i>Fault Indicators</i>	-	\$1.8	\$1.8	
<i>System Allocated Transmission</i>	-	\$6.4	\$6.4	
Situational Awareness	\$5.3	\$1.7	(\$3.6)	Overall program experienced less costs due to recategorization of spend and reduced unit costs.
<i>Weather Station Installs</i>	\$3.6	\$1.5	(\$2.1)	
<i>Fire Impact Modelling</i>	\$1.7	\$0.3	(\$1.4)	
Field Operations & Work Practices	\$1.3	\$0.3	(\$1.0)	Project delayed to 2023 due to resource constraints and contractor availability.
Public Safety Partner Coordination	\$0.3	-	(\$0.3)	Project delayed to 2024 due to resource constraints and contractor availability.
Grand Total	\$23.7	\$19.3	(\$4.4)	PacifiCorp spent \$4.4M less capital than planned, largely due to recategorization of work to O&M and project delays associated with resource and supply chain constraints.

The planned and actual capital investment included in the 2023 WMP and in Table 4 above reflect when actual dollars are spent or dollars are forecast to be spent based on a combination of defined programs or projects, planned work or units, and agreed upon contract rates or unit costs. While these values are helpful to describe activity and planned trends in investment, these values are not used to complete revenue requirement calculations.

In terms of rate recovery, capital costs are reported differently than dollars spent because, consistent with utility accounting practices, assets are not included in rate base until they are placed in service, used and useful. Where projects span multiple years, which is common with wildfire mitigation projects such as line rebuild projects, dollars spent can vary significantly from capital placed in service in a given year. For example, a nominal five-mile covered conductor project may require sixteen months for completion. While capital spend is forecasted and incurred throughout the entire sixteen months and reflected in the WMP filing, the recovery of the full project cost is only reported beginning in the month that the full project completes.

¹¹ See Table 12 at 78 of PacifiCorp’s 2022 WMP.

¹² 2022 actuals reflected in this table may vary slightly from Table 28 in the 2023 WMP as the WMP is prepared prior to the end of the calendar year. Actuals provided in the WMP are estimates forecasted through the duration of the calendar year at the time the filing is prepared in early December.

Table 5 outlines the incremental capital placed in service, used and useful through May 31, 2023. These capital projects are incremental to those included in rates through PacifiCorp's most recent general rate case, Docket UE 399, effective January 1, 2023. The incremental values below correspond to investments included in the annual rate increase calculation summarized at the end of this advice letter.

**Table 5: WMP Capital Placed in Service Incremental to GRC by Program Category
Oregon-Allocated**

Investment Category	Mitigation Program Included	Description of Program(s) Included	Incremental Capital Placed In-Service through 12/16/22	Incremental Capital Placed In-Service 12/17/22 – 5/31/23
Oregon Distribution	Line Rebuild	Distribution line rebuilds including all or parts of the following: installation of covered conductor, transition to underground, pole replacements, and conductor replacements	\$9,651,412	\$3,918,174
	System Automation	Replacement of electromechanical relays protecting distribution with modern, microprocessor relays that provide more accurate data and faster relaying		
	Expulsion Fuse Replacement	Replacement of fuses, lightning arrestors and cutouts with non-expulsion type equipment		
	Fault Indicators	Installation of communicating and non-communicating fault indicators.		
	Weather Stations	Installation of PacifiCorp owned weather station network to collect data and inform situational awareness		
Transmission	Line Rebuild	Rebuild of transmission lines including: poles, insulators, switches, and anchors as part of the Line Rebuild program.	\$2,935,031	\$3,272,143
	System Automation	Replacement of electromechanical relays protecting transmission with modern, microprocessor relays that provide more accurate data and faster relaying		
Oregon Allocated	Situational Awareness (Intangibles)	Investment in tools, software, and hardware to incorporate real time weather data, implement a risk forecasting and impact-based fire weather model, and inform key decision making and protocols.	\$0	\$1,531,489

Operations and Maintenance Expenditures

Table 6 below outlines the incremental planned O&M expense investments included in the approved 2022 WMP, actuals updated since preparation of the 2023 WMP, and a discussion of any variance between planned and actuals. Different than capital spend included in the WMP, expense values below are used to calculate the annual rate increase summarized at the end of this letter.

Table 6: 2022 Planned and Actual Incremental Expense by Program Category (\$/millions)

Program Category	2022 Plan ¹³	2022 Actuals ¹⁴	Variance from Plan	Discussion
Risk Modeling and Drivers	\$0.1	\$0.1	-	N/A – No Variance
Inspection & Correction	\$0.7	\$0.4	(\$0.3)	Program delivered for less than planned cost.
Vegetation Management	\$15.6	\$24.9	\$9.3	2022 plan numbers developed were estimated prior to firm scopes and contracts being in place. In 2022, PacifiCorp experienced an increase in vegetation management costs largely due to the increase in market labor rates.
Grid Hardening	-	\$0.1	\$0.1	O&M portion of grid hardening program costs identified in 2022 to provide material storage space and ensure continuous communication connections with fault indicators. Plans adjusted.
Situational Awareness	\$0.9	\$2.0	\$1.1	Program delivered per plan with a revised allocation to Oregon based on standard software allocation practices.
Field Operations & Work Practices ¹⁵	\$0.2	\$2.8	\$2.6	Program costs in this category are heavily dependent on weather related risks that fluctuate. Initiated programs incurred more than planned spend. Future planning has been adjusted.
PSPS Program	\$0.9	\$2.3	\$1.4	Plan numbers reflect previous experience in other states with smaller scale events. Actuals reflect the cost associated with the PSPS program experienced in 2022. Future planning has been adjusted.
Public Safety Partner Coordination	\$0.1	\$0.1	-	N/A – No variance
WMP Engagement Strategy ¹⁶	\$0.6	\$0.5	(\$0.1)	Program delivered at moderately less than planned cost.
Industry Collaboration	\$0.1	-	(\$0.1)	Work completed per plan but tracking mechanism not fully established to report. Moving forward, PacifiCorp intends to fully capture these costs throughout the year to better reflect actuals.
Plan Monitoring and Implementation	\$0.7	\$0.8	\$0.1	Changes in personnel and resource recruiting challenges moderately impacted actuals.
Grand Total	\$19.7	\$34.0	\$14.1	In 2022, PacifiCorp spent \$14.1M more than planned in the 2022 WMP.

¹³ See Table 13 at 78 of PacifiCorp’s 2022 WMP.

¹⁴ 2022 actuals reflected in this table may vary slightly from Table 29 in the 2023 WMP as the WMP is prepared prior to the end of the calendar year. Actuals provided in the WMP are estimates forecasted through the duration of the calendar year at the time the filing is prepared in early December.

¹⁵ In the 2023 WMP, System Operations was renamed to Field Operations and Work Practices.

¹⁶ In the 2023 WMP, Education and Awareness and Wildfire Plan Engagement Strategies were combined into a single program named WMP Engagement Strategy to more thoughtfully align with the 2023 WMP and formal plan requirements outlined in permanent rules. See OAR §860-300-0020 et. seq.

2. Invoice level data detailing non-labor O&M using the same format as Staff Standard Data Request 57

Invoice level data detailing non-labor O&M summarized in Table 6 above is provided with the workpapers submitted with this filing. Please refer to the Excel file “InvoiceLevelDataDetailingOandM.xlsx” which is in a similar format as Staff Standard Data Request 57.

3. Project-level itemized budget of WMP investments and costs in each annual filing

Project level itemized budget of WMP investment and costs consistent with Table 5 is provided with the workpapers submitted with this filing. Please refer to the Excel file “ProjectLevelItemizedBudget.xlsx”.

4. A detailed reconciliation between the budget and actual expenditures, by project, in each annual filing

Please refer to the workpapers submitted with this filing. Specifically, please refer to the Excel file “ProjectLevelItemizedBudget.xlsx” which includes project level budget and actual expenditures summarized at the project level to accompany the itemized level details.

To support this filing and meet the requirements of OAR 860-022-0025 and OAR 860-022-0230, and the Stipulation adopted in Order No. 23-173, PacifiCorp submits the tariff sheets listed above along with the following Attachment(s):

1. Attachment A – Calculation of Proposed Rates
2. Attachment B – Estimated Effect of Proposed Rate Change

The proposed change will affect approximately 652,000 customers. The effect of the proposed change is an annual rate increase of approximately \$25.8 million or 1.5 percent. If approved, a residential customer using 900 kWh per month would see a bill increase of \$2.53 per month as a result of this change. Attachment B to this filing shows the estimated impact of the proposed change by rate schedule. The Company requests an effective date of November 5, 2023 which is approximately 120 days from the filing date consistent with the Stipulation adopted in Order No. 23-173. In order to minimize rate change dates to customers, the specific date coincides with the effective date of other expected rate changes.

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

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

PROPOSED TARIFFS

+Schedule No.

	SUPPLY SERVICE	
200	Base Supply Service	
201	Net Power Costs – Cost-Based Supply Service	
210	Portfolio Time-of-Use Supply Service	
211	Portfolio Renewable Usage Supply Service	
212	Portfolio Fixed Renewable Energy– Supply Service	
213	Portfolio Habitat Supply Service	
220	Standard Offer Supply Service	
230	Emergency Supply Service	
247	Partial Requirements Supply Service	
276R	Large General Service/Partial Requirements Service – Economic Replacement Power Rider Supply Service	
	ADJUSTMENTS	
90	Summary of Effective Rate Adjustments	
91	Low Income Bill Payment Assistance Fund	
92	Low Income Discount Cost Recovery Adjustment	
93	Independent Evaluator Cost Adjustment	
94	Wildfire Mitigation and Vegetation Management Cost Recovery Adjustment	
96	Property Sales Balancing Account Adjustment	
97	Intervenor Funding Adjustment Cost Recovery Adjustment	
98	Adjustment Associated with the Pacific Northwest Electric Power Planning and Conservation Act	
101	Municipal Exaction Adjustment	
103	Multnomah County Business Income Tax Recovery	
190	Wildfire Mitigation Plan Cost Recovery Adjustment	(C)
192	Deferred Accounting Adjustment	
194	Replaced Meter Deferred Amounts Adjustment	
198	Deer Creek Mine Closure Deferred Amounts Adjustment	
202	Renewable Adjustment Clause – Supply Service Adjustment	
203	Renewable Resource Deferral – Supply Service Adjustment	
204	Oregon Solar Incentive Program Deferral – Supply Service Adjustment	
205	TAM Adjustment for Other Revenues	
206	Power Cost Adjustment Mechanism – Adjustment	
207	Community Solar Start-Up Cost Recovery Adjustment	
270	Renewable Energy Rider – Optional	
271	Energy Profiler Online – Optional	
272	Renewable Energy Rider – Optional Bulk Purchase Option	
290	Public Purpose Charge	
291	System Benefits Charge	
294	Transition Adjustment	
295	Transition Adjustment – Three-Year Cost of Service Opt-Out	
296	Transition Adjustment – Five-Year Cost of Service Opt-Out	
299	Rate Mitigation Adjustment	

WILDFIRE MITIGATION PLAN COST RECOVERY ADJUSTMENT
Purpose

The purpose of this schedule is to implement cost recovery related to the Company's wildfire mitigation plan automatic adjustment clause consistent with OAR 860-300-0080 and ORS 757.210 and Order No. 23-173.

(C)

Applicable

To all Residential and Nonresidential Consumers.

Monthly Billing

All bills calculated in accordance with Schedules contained in the presently effective Tariff will have applied an amount equal to the product of all kWh multiplied by the following applicable rate as listed by Delivery Service schedule.

Schedule 4	0.478 ¢ per kWh
Schedule 5	0.478 ¢ per kWh
Schedule 15	2.641 ¢ per kWh
Schedule 23, 723	0.537 ¢ per kWh
Schedule 28, 728	0.206 ¢ per kWh
Schedule 30, 730	0.138 ¢ per kWh
Schedule 41, 741	0.567 ¢ per kWh
Schedule 47, 747	0.087 ¢ per kWh
Schedule 48, 748, 848	0.087 ¢ per kWh
Schedule 51, 751	2.565 ¢ per kWh
Schedule 53, 752	0.323 ¢ per kWh
Schedule 54, 754	0.403 ¢ per kWh

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Attachment A

Calculation of Proposed Rates

PACIFIC POWER
State of Oregon
Proposed Wildfire Mitigation Plan Cost Recovery Adjustment - Schedule 190

FORECAST 12 MONTHS ENDED DECEMBER 31, 2024

Line No.	Description	Sch No.	No. of Cust	Distribution MWh*	Present Distribution Revenues	Distribution Rate Spread	Proposed WMP	
							Rates	Revenues
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<u>Residential</u>								
1	Residential	4	540,041	5,829,081	\$318,437	58.732%	0.478	\$27,863
2	Total Residential		540,041	5,829,081	\$318,437			\$27,863
<u>Commercial & Industrial</u>								
3	Gen. Svc. < 31 kW	23	85,313	1,166,351	\$71,508	13.189%	0.537	\$6,263
4	Gen. Svc. 31 - 200 kW	28	10,587	2,084,027	\$48,965	9.031%	0.206	\$4,293
5	Gen. Svc. 201 - 999 kW	30	872	1,325,081	\$20,829	3.842%	0.138	\$1,829
6	Large General Service >= 1,000 kW	48	182	6,123,426	\$61,136	11.791%	0.087	\$5,327
7	Partial Req. Svc. >= 1,000 kW	47	6	32,263	\$1,575		0.087	\$28
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	1	270,182	\$1,219		0.087	\$235
9	Agricultural Pumping Service	41	7,913	237,644	\$15,391	2.839%	0.567	\$1,347
10	Total Commercial & Industrial		104,874	11,238,974	\$220,622			\$19,323
<u>Lighting</u>								
11	Outdoor Area Lighting Service	15	5,703	2,054	\$620	0.114%	2.641	\$54
12	Street Lighting Service Comp. Owned	51	1,121	7,381	\$2,163	0.399%	2.565	\$189
13	Street Lighting Service Cust. Owned	53	292	7,519	\$277	0.051%	0.323	\$24
14	Recreational Field Lighting	54	100	1,394	\$64	0.012%	0.403	\$6
15	Total Public Street Lighting		7,215	18,348	\$3,125			\$273
16	Subtotal		652,131	17,086,403	\$542,184	100.000%		\$47,459
17	Employee Discount		975	13,481	(\$177)		(0.120)	(\$16)
18	Total		652,131	17,086,403	\$542,007			\$47,443

* Includes Distribution Only consumer MWh and lighting tariff MWh.

Attachment B

Estimated Effect of Proposed Rate Change

PACIFIC POWER
ESTIMATED EFFECT OF PROPOSED PRICE CHANGE
ON REVENUES FROM ELECTRIC SALES TO ULTIMATE CONSUMERS
DISTRIBUTED BY RATE SCHEDULES IN OREGON
FORECAST 12 MONTHS ENDED DECEMBER 31, 2024

Line No.	Description	Sch No.	No. of Cust	MWh	Present Revenues (\$000)			Proposed Revenues (\$000)			Change				Line No.
					Base Rates	Adders ¹	Net Rates	Base Rates	Adders ¹	Net Rates	Base Rates		Net Rates		
					(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(8) - (5)	(11)/(5)	(10) - (7)	(13)/(7)	(14)	
Residential															
1	Residential	4	540,041	5,829,081	\$737,548	\$24,132	\$761,681	\$737,548	\$40,279	\$777,827	\$0	0.0%	\$16,147	2.1%	1
2	Total Residential		540,041	5,829,081	\$737,548	\$24,132	\$761,681	\$737,548	\$40,279	\$777,827	\$0	0.0%	\$16,147	2.1%	2
Commercial & Industrial															
3	Gen. Svc. < 31 kW	23	85,313	1,166,351	\$149,483	\$5,551	\$155,034	\$149,483	\$9,097	\$158,580	\$0	0.0%	\$3,546	2.3%	3
4	Gen. Svc. 31 - 200 kW	28	10,587	2,084,027	\$186,116	\$23,424	\$209,541	\$186,116	\$25,467	\$211,583	\$0	0.0%	\$2,042	1.0%	4
5	Gen. Svc. 201 - 999 kW	30	872	1,325,081	\$105,890	\$13,822	\$119,712	\$105,890	\$14,617	\$120,507	\$0	0.0%	\$795	0.7%	5
6	Large General Service >= 1,000 kW	48	182	6,123,426	\$435,177	\$23,061	\$458,238	\$435,177	\$25,388	\$460,565	\$0	0.0%	\$2,327	0.5%	6
7	Partial Req. Svc. >= 1,000 kW	47	6	32,263	\$4,320	\$121	\$4,441	\$4,320	\$133	\$4,454	\$0	0.0%	\$12	0.5%	7
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	1	0	\$1,219	\$308	\$1,527	\$1,219	\$411	\$1,629	\$0	0.0%	\$103	6.7%	8
9	Agricultural Pumping Service	41	7,913	237,644	\$30,384	(\$2,250)	\$28,134	\$30,384	(\$1,502)	\$28,882	\$0	0.0%	\$749	2.7%	9
10	Total Commercial & Industrial		104,874	10,968,792	\$912,589	\$64,037	\$976,626	\$912,589	\$73,611	\$986,199	\$0	0.0%	\$9,574	1.0%	10
Lighting															
11	Outdoor Area Lighting Service	15	5,703	8,050	\$788	\$275	\$1,063	\$788	\$297	\$1,086	\$0	0.0%	\$23	2.1%	11
12	Street Lighting Service Comp. Owned	51	1,121	21,063	\$2,715	\$1,044	\$3,759	\$2,715	\$1,124	\$3,839	\$0	0.0%	\$80	2.1%	12
13	Street Lighting Service Cust. Owned	53	292	7,519	\$392	\$237	\$629	\$392	\$247	\$639	\$0	0.0%	\$10	1.6%	13
14	Recreational Field Lighting	54	100	1,394	\$88	\$56	\$143	\$88	\$58	\$146	\$0	0.0%	\$2	1.6%	14
15	Total Public Street Lighting		7,215	38,026	\$3,983	\$1,611	\$5,594	\$3,983	\$1,726	\$5,709	\$0	0.0%	\$115	2.1%	15
16	Subtotal		652,131	16,835,899	\$1,654,120	\$89,781	\$1,743,901	\$1,654,120	\$115,616	\$1,769,736	\$0	0.0%	\$25,835	1.5%	16
17	Employee Discount		975	13,481	(\$419)	(\$14)	(\$433)	(\$419)	(\$23)	(\$443)	\$0		(\$9)		17
17	Paperless Credit				(\$2,072)		(\$2,072)	(\$2,072)		(\$2,072)	\$0		\$0		17
18	AGA Revenue				\$3,521		\$3,521	\$3,521		\$3,521	\$0		\$0		18
19	COOC Amortization				\$1,767		\$1,767	\$1,767		\$1,767	\$0		\$0		19
20	Total Sales with AGA		652,131	16,835,899	\$1,656,916	\$89,767	\$1,746,683	\$1,656,916	\$115,593	\$1,772,509	\$0	0.0%	\$25,826	1.5%	20

¹ Excludes effects of the Low Income Bill Payment Assistance Fund (Sch. 91), Low Income Discount Cost Recovery Adjustment (Sch. 92), BPA Credit (Sch. 98), Public Purpose Charge (Sch. 290) and System Benefits Charge (Sch. 291).

² Percentages shown for Schedules 48 and 47 reflect the combined rate change for both schedules