

February 17, 2023

VIA ELECTRONIC FILINGPublic Utility Commission of Oregon
Attn: Filing Center
201 High Street, SE, Suite 100
Salem, Oregon 97301-3389**RE: Advice No. 23-004—Schedule 291 – System Benefits Charge**

In compliance with ORS 757.205, OAR 860-022-0025, OAR 860-022-0030, and ORS 757.210, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) encloses for filing 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 the State of Oregon. The Company respectfully requests an effective date of April 1, 2023.

Sheet Number	Schedule/Rule	Title
First Revision of Sheet No. 291.1	Schedule 291	System Benefits Charge
First Revision of Sheet No. 291.2	Schedule 291	System Benefits Charge

Purpose

The purpose of this filing is to update Schedule 291, System Benefits Charge (Schedule 291), to include recovery of the incremental costs associated with implementation and administration of the Community Benefits and Impacts Advisory Group (CBIAG) and establish an automatic adjustment clause to recover these costs, and to update the amounts collected through the schedule to fund the Company's demand response programs.

Proposal***Community Benefits and Impacts Advisory Group***

In July 2021, the Governor of Oregon signed into law House Bill (HB) 2021 effective September 25, 2021. Section 6 of HB 2021 requires an electric company that files a clean energy plan shall establish a CBIAG. Section 6 (3) further provides that:

The commission shall establish a process for an electric company to contemporaneously recover the cost associated with the development of biennial reports and the costs associated with compensation or reimbursement for time and travel of members of a Community Benefits and Impacts Advisory Group.

In October 2022, the Company held the first CBIAG on-boarding session in Medford, OR. CBIAG members attended in person and virtually (hybrid). These meetings continue to be held monthly rotating formats from online and hybrid formats through 2023. As of December 31,

2022, the Company has spent \$84,451. These costs include third-party facilitation, participation compensation, and travel reimbursement to CBIAG members to foster accessibility and greater participation. All meetings are open to the public and include an online participation modality, which includes live Spanish and American Sign Language translation services.

On January 6, 2022, the Company filed an application in docket UM 2222 requesting authorization to defer the incremental costs associated with the Section 6 of HB 2021. The Commission approved the request on March 22, 2022. The Company subsequently filed an application to reauthorize the deferral on January 6, 2023 and included an estimated 2023 budget for ongoing activities of \$510,983. In the 2022 deferral request, the Company committed to filing a proposal for recovery. This filing proposes rates which will collect the 2023 budget along with the \$84,451 for previously deferred costs.

The Company proposes to add CBIAG recovery to the rates in Schedule 291. Recovering these costs through the existing rate schedule will simplify tariffs and customer rates. The Company proposes to implement a balancing account and automatic adjustment clause for recovery of the costs of the CBAIG program going forward. In future years, the Company will make an annual advice filing to review the CBIAG cost recovery and adjust the Schedule 291 rate, if needed, to reflect the Company's projections of the CBIAG-related expense for the coming year plus incorporate any amounts in the balancing account.

Page 1 of Attachment 1 to this filing shows the calculation of the proposed adder to Schedule 291 rates related to CBIAG recovery. The proposed rates will recover approximately \$0.59 million which is a rate increase to customers of approximately 0.04 percent.

Demand Response Programs

The Company seeks to increase the amount collected for demand response programs in Schedule 291 to recover costs for its irrigation load control demand response program (and predecessor pilot) in Oregon. This is consistent with the Company's program proposal approved by the Commission on May 6, 2022, and the deferral application in UM 2265. The irrigation load control program provides capacity energy and reserves from June through mid-September through curtailment of irrigation pumping loads. Additionally, the Company seeks to use Schedule 291 to recover costs for its commercial and industrial demand response program in Oregon. This is consistent with the Company's program proposal approved by the Commission on November 16, 2022. The commercial and industrial program provides capacity, energy, and ancillary grid services through curtailment of commercial and industrial loads throughout the year depending on a participant's election of dispatch notification. The costs incurred in 2023 and beyond will be in support of establishing the program and expanding it to achieve demand capacity expectations.

The Company proposes to update the rates in Schedule 291 to collect approximately \$2.55 million for demand response programs. This is an increase of approximately \$2.41 million over the amount currently collected in rates for demand response.

Page 2 of Attachment 1 to this filing shows the calculation of the proposed rate change to Schedule 291 to update the collections related to demand response programs. The proposed change will result in an increase to customers of approximately 0.17 percent.

Other Amounts Collected Through the System Benefits Charge

The System Benefits Charge will continue to collect amounts previously approved for Energy Efficiency and Transportation Electrification Programs. Page 3 of Attachment 1 to this filing summarizes the total present and proposed Schedule 291 rates. The Company has updated the allocation percentages on page 2 of the tariff to properly reflect the increased collections for demand response and the new collections for CBAIG.

Impacts

To support this filing and meet the requirements of OAR 860-022-0025 and OAR 860-022-0030, the Company submits proposed Schedule 291 along with the following attachments:

Attachment 1: Proposed Change to System Benefits Charge

Attachment 2: Estimated Effect of Proposed Changes

Attachment 1 show the proposed rate spread and rates for each proposed change to the System Benefits Charge along with a summary showing the total proposed tariff rates. Attachment 2 shows, by rate schedule, the effect of the change to the System Benefits Charge. The overall rate impact is an increase of approximately \$3.0 million or 0.2 percent. This proposed change will affect approximately 646,000 customers. The average residential customer using 900 kilowatt-hours per month would see a monthly bill increase of \$0.24 as a result of these changes.

It is respectfully requested that all data 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

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

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

PROPOSED TARIFFS

SYSTEM BENEFITS CHARGE
Purpose

To fund programs which provide a system benefit including planning and pursuit of cost-effective energy efficiency resources pursuant to ORS 757.054 and Oregon Laws 2021, Ch. 547, §2, support and integration of transportation electrification pursuant to Oregon Laws 2021, Ch. 95, §2, participation in and support for the Community Benefits and Impacts Advisory Group (CBIAG) pursuant to ORS 469A.425, and other programs approved by the Commission.

 (N)
 (N)
 (N)

Applicable

To all Consumers located within Company's service territory in Oregon, including Consumers receiving electricity from an Electricity Service Supplier (ESS).

Monthly Billing

The applicable adjustment rates are listed below by Delivery Service Schedule:

Delivery Service Schedule	Adjustment Rate
4	0.614 cents per kWh
5	0.614 cents per kWh
15	0.891 cents per kWh
23, 723	0.626 cents per kWh
28, 728	0.489 cents per kWh
30, 730	0.439 cents per kWh
41, 741	0.569 cents per kWh
47, 747	0.348 cents per kWh
48, 748, 848	0.348 cents per kWh
51, 751	1.072 cents per kWh
53, 753	0.428 cents per kWh
54, 754	0.530 cents per kWh

 (I)
 (I)

(continued)

SYSTEM BENEFITS CHARGE

Monthly Billing (continued)

Certain Consumers may qualify for a Restricted System Benefits Charge as defined below in this Schedule. Instead of the standard System Benefits Charge above, these qualified consumers shall be charged under this tariff the total percentage rate below applied to the same charges on the Consumer's monthly bill to which the Schedule 290, Public Purpose Charge applies:

Energy Efficiency- Restricted	1.70%	
Demand Response	0.18%	(I)
Transportation Electrification	0.25%	
CBIAG	0.04%	(N)
<hr/>		
Total Restricted System Benefits Charge	2.17%	(I)

Allocation of Funds

Funds collected under this schedule will be allocated as follows:

1. Funds collected under the standard rates will be allocated 88.7% to Energy Trust of Oregon energy efficiency programs, 2.5% to Company energy efficiency programs and administration, 3.6% to demand response programs, 4.4% to transportation electrification programs, 0.8% to CBIAG. (C)
2. Funds collected under the restricted rate for qualifying consumers will be allocated 76.3% to Energy Trust of Oregon energy efficiency programs, 2.1% to Company energy efficiency programs and administration, 8.2% to demand response programs, 11.5% to transportation electrification programs, 1.9% to CBIAG. (C)

Qualification for the Restricted System Benefits Charge

A retail electricity Consumer that uses more than one average megawatt of electricity at any Site, as defined below, in the prior year will be subject to the Restricted System Benefits Charge identified above in lieu of the standard System Benefits Charge. Pursuant to Oregon Laws 2021, Ch. 547, §3, a retail electricity Consumer that uses more than one average megawatt of electricity at any Site in the prior year may not be charged an amount for energy efficiency that exceeds 1.7 percent of the total revenue received from the sale of electricity services to the Site from any source.

Pursuant to Oregon Laws 2021, Ch. 547, §3:

(a) "Single contiguous area" includes an area of land crossed by a public or railroad right of way, but does not include infrastructure facilities located within the public or railroad right of way for purposes of determining whether the single contiguous area of land constitutes a Site.

(b) "Site" means:

(A) Buildings and related structures that are interconnected by facilities owned by a single retail electricity Consumer and that are served through a single electric meter;

(continued)

Attachment 1

Proposed Change to System Benefits Charge

**PACIFIC POWER
STATE OF OREGON
CALCULATION OF PROPOSED ADDER TO THE DEMAND RESPONSE PORTION OF SYSTEM BENEFITS CHARGE
FORECAST 12 MONTHS ENDED DECEMBER 31, 2023**

Line No.	Description	Sch No.	Test Period MWh ¹	Estimated Standard SBC MWh ²	Estimated Restricted SBC MWh	Present Net Revenues ² (\$000)	Net Average Rates €/kWh	Estimated Revenues Standard SBC Sites (\$000)	Estimated Revenues Restricted SBC Sites (\$000)	Proposed Rate Adder for Standard SBC Sites			Proposed Rate Adder for Restricted SBC Sites	
										Spread %	Revenues (\$000)	Rate €/kWh	Rate %	Revenues (\$000)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
					(3) - (4)		(6) / (3)	(4) * (7)	(6) - (8)		(9) * (10)	(11) / (5)		(8) * (13)
Residential														
1	Residential	4	5,633,856	5,633,856	0	\$710,368	12.609	\$710,368	\$0	0.17%	\$1,183	0.021	0.17%	\$0
2	Total Residential		5,633,856	5,633,856	0	\$710,368		\$710,368	\$0		\$1,183			\$0
Commercial & Industrial														
3	Gen. Svc. < 31 kW	23	1,137,011	1,072,079	64,932	\$146,122	12.851	\$137,778	\$8,345	0.17%	\$225	0.021	0.17%	\$14
4	Gen. Svc. 31 - 200 kW	28	1,992,271	1,893,305	98,966	\$193,972	9.736	\$184,336	\$9,636	0.17%	\$303	0.016	0.17%	\$16
5	Gen. Svc. 201 - 999 kW	30	1,281,581	1,208,841	72,741	\$112,247	8.758	\$105,876	\$6,371	0.17%	\$181	0.015	0.17%	\$11
6	Large General Service >= 1,000 kW	48	3,584,056	677,998	2,906,058	\$254,225	7.093	\$48,092	\$206,133	0.17%	\$81	0.012	0.17%	\$343
7	Partial Req. Svc. >= 1,000 kW	47	29,109	13,562	15,547	\$3,950	13.569	\$1,840	\$2,110	0.17%	\$2	0.012	0.17%	\$4
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	286,471	0	286,471	\$1,394	0.487	\$0	\$1,394	0.17%	\$0	0.012	0.17%	\$2
9	Agricultural Pumping Service	41	234,973	227,322	7,651	\$26,778	11.396	\$25,906	\$872	0.17%	\$43	0.019	0.17%	\$1
10	Total Commercial & Industrial		8,545,471	5,093,106	3,452,365	\$738,688		\$503,829	\$234,860		\$836			\$391
Lighting														
11	Outdoor Area Lighting Service	15	2,108	2,108	0	\$1,053	49.976	\$1,053	\$0	0.17%	\$2	0.083	0.17%	\$0
12	Street Lighting Service Comp. Owned	51	8,373	8,373	0	\$4,123	49.236	\$4,123	\$0	0.17%	\$7	0.082	0.17%	\$0
13	Street Lighting Service Cust. Owned	53	11,452	11,452	0	\$924	8.072	\$924	\$0	0.17%	\$1	0.013	0.17%	\$0
14	Recreational Field Lighting	54	1,141	1,141	0	\$115	10.086	\$115	\$0	0.17%	\$0	0.017	0.17%	\$0
15	Total Public Street Lighting		23,074	23,074	0	\$6,215		\$6,215	\$0		\$10			\$0
16	Subtotal		14,202,402	10,750,036	3,452,365	\$1,455,272		\$1,220,412	\$234,860		\$2,029			\$391
17	Employee Discount		13,030	13,030	0	(\$404)		(\$404)	\$0		(\$1)			\$0
18	Paperless Credit					(\$2,072)								
19	AGA Revenue					\$3,521								
20	COOC Amortization					\$1,767								
21	Total Sales with AGA		14,202,402	10,750,036	3,452,365	\$1,458,084		\$1,220,009	\$234,860		\$2,028			\$391

Proposed Increase to Demand Response Collection	\$2,419
Present Demand Response Collection	\$131
Total Proposed Demand Response Collection	\$2,550

¹ Includes Distribution Only consumer MWh and lighting tariff MWh

² MWh for the test period based on historic MWh for consumers paying the Standard SBC rate.

² Excludes effects of the Low Income Bill Payment Assistance Charge (Sch. 91), BPA Credit (Sch. 98), Public Purpose Charge (Sch. 290) and System Benefits Charge (Sch. 291).

PACIFIC POWER
STATE OF OREGON
PRESENT AND PROPOSED SYSTEM BENEFITS CHARGE
FORECAST 12 MONTHS ENDED DECEMBER 31, 2023

Line No.	Description	Sch No.	Estimated Standard SBC MWh ¹	Estimated Revenues Restricted SBC Sites (\$000) ²	Present SBC			Proposed SBC Changes					Total Proposed SBC							
					Total			Additional Demand Response		CBIAG Funding			Total							
					Std Rate e/kWh	Rstr Rate %	Revenues (\$000)	Std Rate e/kWh	Revenues (\$000)	Rtr Rate %	Revenues (\$000)	Total (\$000)	Std Rate e/kWh	Revenues (\$000)	Rtr Rate %	Revenues (\$000)	Total (\$000)	Std Rate e/kWh	Rstr Rate %	Revenues (\$000)
(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)					
Residential																				
1	Residential	4	5,633,856	\$0	0.588	1.96%	\$33,127	0.021	\$1,183	0.17%	\$0	\$1,183	0.005	\$282	0.04%	\$0	\$282	0.614	2.17%	\$34,592
2	Total Residential		5,633,856	\$0			\$33,127		\$1,183		\$0	\$1,183		\$282		\$0	\$282			\$34,592
Commercial & Industrial																				
3	Gen. Svc. < 31 kW	23	1,072,079	\$8,345	0.600	1.96%	\$6,596	0.021	\$225	0.17%	\$14	\$239	0.005	\$54	0.04%	\$3	\$57	0.626	2.17%	\$6,892
4	Gen. Svc. 31 - 200 kW	28	1,893,205	\$9,636	0.469	1.96%	\$9,068	0.016	\$303	0.17%	\$16	\$319	0.004	\$76	0.04%	\$4	\$80	0.489	2.17%	\$9,467
5	Gen. Svc. 201 - 999 kW	30	1,208,841	\$6,371	0.420	1.96%	\$5,202	0.015	\$181	0.17%	\$11	\$192	0.004	\$48	0.04%	\$3	\$51	0.439	2.17%	\$5,445
6	Large General Service >= 1,000 kW	48	677,998	\$206,133	0.333	1.96%	\$6,298	0.012	\$81	0.17%	\$343	\$424	0.003	\$20	0.04%	\$84	\$105	0.348	2.17%	\$6,827
7	Partial Req. Svc. >= 1,000 kW	47	13,562	\$2,110	0.233	1.96%	\$87	0.012	\$2	0.17%	\$4	\$5	0.003	\$0	0.04%	\$1	\$1	0.348	2.17%	\$93
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	0	\$1,394	0.233	1.96%	\$27	0.012	\$0	0.17%	\$2	\$2	0.003	\$0	0.04%	\$1	\$1	0.348	2.17%	\$30
9	Agricultural Pumping Service	41	227,322	\$872	0.545	1.96%	\$1,256	0.019	\$43	0.17%	\$1	\$45	0.005	\$11	0.04%	\$0	\$12	0.569	2.17%	\$1,312
10	Total Commercial & Industrial		5,093,106	\$234,860			\$28,534		\$836		\$391	\$1,226		\$210		\$96	\$306			\$30,067
Lighting																				
11	Outdoor Area Lighting Service	15	2,108	\$0	0.788	1.96%	\$17	0.083	\$2	0.17%	\$0	\$2	0.020	\$0	0.04%	\$0	\$0	0.891	2.17%	\$19
12	Street Lighting Service Comp. Owned	51	8,373	\$0	0.970	1.96%	\$81	0.082	\$7	0.17%	\$0	\$7	0.020	\$2	0.04%	\$0	\$2	1.072	2.17%	\$90
13	Street Lighting Service Cust. Owned	53	11,452	\$0	0.412	1.96%	\$47	0.013	\$1	0.17%	\$0	\$1	0.003	\$0	0.04%	\$0	\$0	0.428	2.17%	\$49
14	Recreational Field Lighting	54	1,141	\$0	0.509	1.96%	\$6	0.017	\$0	0.17%	\$0	\$0	0.004	\$0	0.04%	\$0	\$0	0.530	2.17%	\$6
15	Total Public Street Lighting		23,074	\$0			\$151		\$10		\$0	\$10		\$2		\$0	\$2			\$164
16	Subtotal		10,750,036	\$234,860			\$61,812		\$2,029		\$391	\$2,420		\$494		\$96	\$590			\$64,822
17	Employee Discount		13,030	\$0			(\$19)		(\$1)		\$0	(\$1)		(\$0)		\$0	(\$0)			(\$20)
18	Total Sales with AGA		10,750,036	\$234,860			\$61,793		\$2,028		\$391	\$2,419		\$494		\$96	\$590			\$64,802

¹ MWh for the test period based on historic MWh for consumers paying the Standard SBC rate. Includes Distribution Only consumer MWh and lighting tariff MWh.
² Excludes effects of the Low Income Bill Payment Assistance Charge (Sch. 91), BPA Credit (Sch. 98), Public Purpose Charge (Sch. 290) and System Benefits Charge (Sch. 291).

Attachment 2

Estimated Effect of Proposed Changes

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, 2023

Line No.	Description	Pre Sch No.	Pro 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		
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	
								(6) + (7)			(9) + (10)	(9) - (6)	(12)/(6)	(11) - (8)	(14)/(8)	
Residential																
1	Residential	4	4	535,059	5,633,856	\$714,481	\$29,014	\$743,495	\$714,481	\$30,479	\$744,960	\$0	0.0%	\$1,465	0.2%	1
2	Total Residential			535,059	5,633,856	\$714,481	\$29,014	\$743,495	\$714,481	\$30,479	\$744,960	\$0	0.0%	\$1,465	0.2%	2
Commercial & Industrial																
3	Gen. Svc. < 31 kW	23	23	84,329	1,137,011	\$145,997	\$6,721	\$152,718	\$145,997	\$7,017	\$153,015	\$0	0.0%	\$296	0.2%	3
4	Gen. Svc. 31 - 200 kW	28	28	10,462	1,992,271	\$177,615	\$25,425	\$203,040	\$177,615	\$25,824	\$203,439	\$0	0.0%	\$399	0.2%	4
5	Gen. Svc. 201 - 999 kW	30	30	797	1,281,581	\$102,276	\$15,173	\$117,449	\$102,276	\$15,416	\$117,692	\$0	0.0%	\$243	0.2%	5
6	Large General Service >= 1,000 kW	48	48	190	3,584,056	\$249,709	\$10,814	\$260,523	\$249,709	\$11,343	\$261,052	\$0	0.0%	\$529	0.2%	6
7	Partial Req. Svc. >= 1,000 kW	47	47	6	29,109	\$3,913	\$123	\$4,036	\$3,913	\$130	\$4,043	\$0	0.0%	\$6	0.2%	7
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	848	1	0	\$1,291	\$130	\$1,421	\$1,291	\$133	\$1,424	\$0	0.0%	\$3	0.2%	8
9	Agricultural Pumping Service	41	41	7,998	234,973	\$30,056	(\$2,022)	\$28,034	\$30,056	(\$1,966)	\$28,091	\$0	0.0%	\$56	0.2%	9
10	Total Commercial & Industrial			103,783	8,259,000	\$710,858	\$56,364	\$767,223	\$710,858	\$57,897	\$768,755	\$0	0.0%	\$1,532	0.2%	10
Lighting																
11	Outdoor Area Lighting Service	15	15	5,809	8,260	\$809	\$261	\$1,070	\$809	\$263	\$1,072	\$0	0.0%	\$2	0.2%	11
12	Street Lighting Service Comp. Owned	51	51	1,108	23,893	\$3,080	\$1,124	\$4,204	\$3,080	\$1,133	\$4,212	\$0	0.0%	\$9	0.2%	12
13	Street Lighting Service Cust. Owned	53	53	314	11,452	\$597	\$374	\$972	\$597	\$376	\$973	\$0	0.0%	\$2	0.2%	13
14	Recreational Field Lighting	54	54	102	1,141	\$73	\$48	\$121	\$73	\$48	\$121	\$0	0.0%	\$0	0.2%	14
15	Total Public Street Lighting			7,333	44,746	\$4,559	\$1,807	\$6,366	\$4,559	\$1,820	\$6,379	\$0	0.0%	\$13	0.2%	15
16	Subtotal			646,176	13,937,602	\$1,429,898	\$87,186	\$1,517,084	\$1,429,898	\$90,196	\$1,520,094	\$0	0.0%	\$3,010	0.2%	16
17	Employee Discount			966	13,030	(\$406)	(\$17)	(\$423)	(\$406)	(\$18)	(\$424)	\$0		(\$1)		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			646,176	13,937,602	\$1,432,708	\$87,169	\$1,519,877	\$1,432,708	\$90,178	\$1,522,886	\$0	0.0%	\$3,009	0.2%	20

¹ Excludes effects of the Low Income Bill Payment Assistance Charge (Sch. 91), BPA Credit (Sch. 98) and Public Purpose Charge (Sch. 290). INCLUDES the System Benefits Charge (Sch. 291).

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