

December 14, 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 Related to the Demand Response Programs Approved in Schedule 106

PacifiCorp d/b/a Pacific Power submits for filing its Application for Approval of Deferred Accounting for Costs Related to the Demand Response Programs Approved in Schedule 106.

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
Email: oregondockets@pacificorp.com

Ajay Kumar
Senior Attorney
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: ajay.kumar@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, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

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 Related to the Demand
Response Programs Approved in Schedule 106.

**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 the Company to establish and maintain a balancing account to record the deferral of program costs related to demand response programs approved by the Commission under Tariff Schedule 106. PacifiCorp respectfully requests authorization for the 12 months beginning on January 1, 2023.

II. CONTACT INFORMATION

Communications regarding this application should be addressed to:

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: oregondockets@pacificorp.com

Ajay Kumar
Senior Attorney
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: ajay.kumar@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

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 this Application, PacifiCorp seeks Commission authorization to establish and maintain a balancing account for all demand response programs approved by the Commission under Schedule 106. PacifiCorp's Schedule 106 enables multiple demand response programs that are approved by the Commission, in which eligible customers can participate. These voluntary programs are part of the continuing implementation of resources identified in PacifiCorp's integrated resource plans (IRPs), including the Company's 2019 IRP. To date, the Commission has approved two demand response programs under Schedule 106. On May 5, 2022, the Commission approved an irrigation demand response program under Schedule 106.¹ On November 16, 2022, the Commission approved a commercial and industrial demand response program under Schedule 106.² The Company will seek amortization of the deferred amount through Schedule 291 in a future Commission proceeding.³

PacifiCorp is currently tracking costs associated with the irrigation demand response program under the application for deferred accounting approved in UM 2158. For

¹ On May 5, 2022, the Commission issued an order adopting Staff's recommendation to approve PacifiCorp's advice filing 22-004.

² On October 15, 2022, the Commission adopted Staff's recommendation to approve PacifiCorp's advice filing 22-011.

³ In advice filing 22-004 and 22-001, the Company indicated its intent to utilize Schedule 291 (System Benefit Charge) for the recovery of costs associated with both the Irrigation and Commercial and Industrial demand response programs.

administrative efficiency, PacifiCorp recommends consolidating the UM 2158 deferral into this deferral by transferring all unamortized amounts previously deferred through under UM 2158 through December 31, 2022, to the new deferral requested in this docket. This will ensure that all costs approved under Schedule 106 demand response programs are tracked under a single deferral moving forward.

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

A. Description of Utility Expense

PacifiCorp respectfully requests authorization under ORS 757.259(2)(e) to establish and maintain a balancing account to record costs and revenues associated with implementing demand response programs approved by the Commission under Schedule 106. PacifiCorp anticipates that it will incur costs associated with the irrigation, commercial and industrial, and other demand response programs that may be approved by the Commission under Schedule 106. These costs will include vendor costs, customer incentives, customer outreach/advertising, evaluation, measurement and verification, and utility staffing directly attributable to managing these programs.

B. Reasons for Deferral

ORS 757.259(2)(e) allows the deferral of utility expenses or revenues where necessary to match appropriately the costs borne by and benefits received by customers. This request seeks to track the costs associated with its demand response programs for recovery through Schedule 291 in a future Commission proceeding.

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 following table provides an estimate of the costs that will be deferred under the deferral requested in this application through 2026. This table also provides irrigation demand response program costs tracked under the UM 2158 deferral. PacifiCorp will consolidate the deferral of the amounts outstanding under the UM 2158 deferral into the deferral account requested in this application. The irrigation program filed and approved under Advice No. 22-004 (successor program) replaced the irrigation pilot program filed and approved under Advice No. 16-04. The two programs have a similar focus; providing demand response incentives to irrigation customers in return for curtailment of their load during Company-initiated events. Customers enrolled in the pilot remained enrolled in the successor program. Both programs are designed around similar outcomes; providing flexible load for the Company and to simplify tracking.

Program	2021*	2022**	2023	2024	2025	2026	Totals
Irrigation Pilot	\$302,869	\$81,785					\$384,654
Irrigation		\$1,767,241	\$1,860,915	\$2,238,451	\$1,942,257	\$1,999,190	\$9,808,054
Commercial & Industrial		\$3,293,417	\$3,906,166	\$3,891,633	\$3,891,633	\$3,875,663	\$18,858,512
Total	\$302,869	\$5,142,443	\$5,767,081	\$6,130,084	\$5,833,890	\$5,874,853	\$29,051,220

* Year-end balance

** Irrigation Pilot is sum of March, April, May 2022. 2022 irrigation is ADV 22-004 forecast - June thru Oct costs

E. Notice

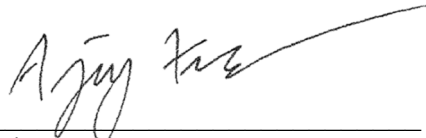
A copy of the Notice of Application and a list of persons served with the notice are attached as Exhibit A to this application.

V. CONCLUSION

PacifiCorp respectfully requests that, in accordance with ORS 757.259(2)(e), the Commission authorize the Company to establish and maintain a balancing account to defer costs associated with demand response program approved by the Commission under Schedule 106 for the 12 months beginning January 1, 2023. For administrative efficiency, PacifiCorp will transfer all unamortized amounts previously deferred under UM 2158 through December 31, 2022, to the new deferral requested in this docket. PacifiCorp will seek recovery of these deferred costs through Schedule 291 in a future Commission proceeding.

Respectfully submitted this 14th day of December 2022.

By:



Ajay Kumar
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 Related to the Demand
Response Programs Approved in Schedule 106

**NOTICE OF
APPLICATION FOR DEFERRED
ACCOUNTING**

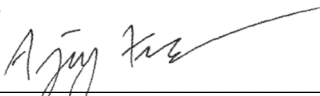
On December 14, 2022, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) filed an application with the Public Utility Commission of Oregon (Commission) for an order authorizing deferred accounting to establish and maintain a balancing account to record the deferral of program costs related to demand response programs approved by the Commission under Tariff Schedule 106. The Company also proposes in its application to cease tracking the irrigation demand response program costs under the existing deferral authorized in docket UM 2158 and instead track those costs under the new deferral requested in this docket. 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 December 14, 2022.

By:



Ajay Kumar
Senior Attorney

CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of **PacifiCorp's Application for Approval of Deferred Accounting** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

Service List UE 399

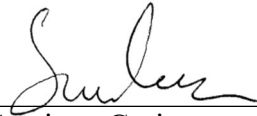
PACIFICORP	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com	KATHERINE A MCDOWELL MCDOWELL RACKNER & GIBSON PC 419 SW 11TH AVE., SUITE 400 PORTLAND, OR 97205 katherine@mrg-law.com
CARLA SCARSELLA (C) PACIFICORP 825 NE MULTNOMAH ST STE 2000 PORTLAND, OR 97232 carla.scarsella@pacificorp.com	
STAFF	
JILL D GOATCHER (C) PUC STAFF--DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM, OR 97301-4096 jill.d.goatcher@doj.state.or.us	MATTHEW MULDOON (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308 matt.muldoon@state.or.us
JOHANNA RIEMENSCHNEIDER (C) PUC STAFF - DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM, OR 97301-4796 johanna.riemenschneider@doj.state.or.us	
AWEC	
BRENT COLEMAN (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY, SUITE 450 PORTLAND, OR 97201 blc@dvclaw.com	JESSE O GORSUCH (C) 1750 SW HARBOR WAY STE 450 PORTLAND, OR 97201 jog@dvclaw.com

<p>TYLER C PEPPLER (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND, OR 97201 tcp@dvclaw.com</p>	
<p>CALPINE SOLUTIONS</p>	
<p>GREGORY M. ADAMS (C) RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE, ID 83702 greg@richardsonadams.com</p>	<p>GREG BASS CALPINE ENERGY SOLUTIONS, LLC 401 WEST A ST, STE 500 SAN DIEGO, CA 92101 greg.bass@calpinesolutions.com</p>
<p>KEVIN HIGGINS (C) ENERGY STRATEGIES LLC 215 STATE ST - STE 200 SALT LAKE CITY, UT 84111-2322 khiggins@energystrat.com</p>	
<p>CUB</p>	
<p>MICHAEL GOETZ (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 mike@oregoncub.org</p>	<p>WILLIAM GEHRKE (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 will@oregoncub.org</p>
<p>OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org</p>	
<p>FRED MEYER</p>	
<p>JUSTIN BIEBER (C) FRED MEYER/ENERGY STRATEGIES LLC 215 SOUTH STATE STREET, STE 200 SALT LAKE CITY, UT 84111 jbieber@energystrat.com</p>	<p>KURT J BOEHM (C) BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 kboehm@bkllawfirm.com</p>
<p>JODY KYLER COHN (C) BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 jkylercohn@bkllawfirm.com</p>	

KWUA	
LLOYD REED (C) REED CONSULTING 10025 HEATHERWOOD LANE HIGHLANDS RANCH, CO 80126 lloyd.reed@lloydreedconsulting.com	CRYTAL RIVERA (C) SOMACH SIMMONS & DUNN 500 CAPITOL MALL STE 1000 SACRAMENTO, CA 95814 crivera@somachlaw.com
NEWSUN ENERGY	
JACOB (JAKE) STEPHENS NEWSUN ENERGY 3500 S DUPONT HWY DOVER, DE 19901 jstephens@newsunenergy.net	MAX YOKLIC NEW SUN ENERGY LLC 2033 E. SPEEDWAY BLVD, SUITE 200 TUCSON, AZ 85719 myoklic@newsunenergy.net
MARIE P BARLOW NEWSUN ENERGY LLC 390 SW COLUMBIA ST STE 120 BEND OR 97702 mbarlow@newsunenergy.net	
NIPPC	
CARL FINK BLUE PLANET ENERGY LAW LLC 628 SW CHESTNUT ST, STE 200 PORTLAND, OR 97219 cmfink@blueplanetlaw.com	SPENCER GRAY NIPPC sgray@nippc.org
OREGON FARM BUREAU	
PAUL S SIMMONS (C) OREGON FARM BUREAU FEDERATION 550 CAPITOL MALL STE 1000 SACREAMENTO, CA 95814 psimmons@somachlaw.com	MARY ANNE COOPER (C) OREGON FARM BUREAU FEDERATION 1320 CAPITOL ST NE STE 200 SALEM, OR 97301 maryanne@oregonfb.org
SBUA	
GRANT HART (C) SMALL BUSINESS UTILITY ADVOCATES grant@utilityadvocates.org	DIANE HENKELS SMALL BUSINESS UTILITY ADVOCATES 621 SW MORRISON ST. STE 1025 PORTLAND, OR 97205 diane@utilityadvocates.org
WILLIAM STEELE (C) BILL STEELE AND ASSOCIATES, LLC PO BOX 631151 HIGHLANDS RANCH, CO 80164 w.steele1@icloud.com	

VITESSE	
DENNIS BARTLETT META PLATFORMS, INC. 1 HACKER WAY MENLO PARK, CA 94025 dbart@fb.com	LIZ FERRELL META PLATFORMS, INC. 1 HACKER WAY MENLO PARK, CA 94025 eferrell@fb.com
IRION A SANGER 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
ALEX KRONAUER (C) WALMART alex.kronauer@walmart.com	

Dated this 14th day of December 2022.



 Santiago Gutierrez
 Coordinator, Regulatory Operations

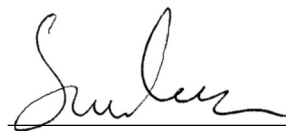
CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of **PacifiCorp’s Application for Approval of Deferred Accounting** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

**Service List
UM 2158**

PACIFICORP	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com	AJAY KUMAR PACIFICORP 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 ajay.kumar@pacificorp.com
STAFF	
HEATHER COHEN PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM OR 97308-1088 heather.b.cohen@puc.oregon.gov	MITCH MOORE PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM OR 97308-1088 mitch.moore@puc.oregon.gov
KATHY ZARATE PUBLIC UTILITY COMMISSION OF OREGON 201 HIGH ST SE STE 100 SALEM OR 97301 kathy.zarate@puc.oregon.gov	SOMMER MOSER PUC STAFF - DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301 sommer.moser@doj.state.or.us

Dated this 14th day of December, 2022.



Santiago Gutierrez
Coordinator, Regulatory Operations