

October 26, 2017

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: UM 1696—PacifiCorp's Comments

PacifiCorp d/b/a Pacific Power appreciates the opportunity to provide comments in the above-referenced docket. PacifiCorp is committed to pursuing all cost-effective energy efficiency resources on behalf of its customers, and in collaboration with the Energy Trust of Oregon (ETO). PacifiCorp additionally supports the Public Utility Commission of Oregon's (Commission) open process for examining the cost-effectiveness exceptions for certain measures.

PacifiCorp's biennial Integrated Resource Plan (IRP) identifies energy efficiency resources that are cost-effective, reliable, and feasible when compared to supply-side alternatives. The level of energy efficiency identified in the IRP Preferred Portfolio is included in PacifiCorp's IRP Action Plan, which sets the expectation for resource acquisition across PacifiCorp's six-state territory. In PacifiCorp's 2017 IRP, planned cost-effective energy efficiency acquisitions are expected to offset 88 percent of load growth through 2026.

In its final comments and recommendation on PacifiCorp's 2017 IRP, Commission staff raises concerns with "a history of EE [energy efficiency] savings in PacifiCorp's [Oregon] service territory consistently in excess of its forecasted savings[.]"¹ Staff noted that the ETO's energy efficiency acquisitions have exceeded the Oregon energy efficiency targets included in PacifiCorp's IRP Preferred Portfolios by an average of 32 percent since 2010.² As discussed above, the amount of energy efficiency included in PacifiCorp's IRP Preferred Portfolio is the amount identified as cost-effective to PacifiCorp's system by PacifiCorp's optimization model.

While PacifiCorp recognizes that there may be policy reasons to pursue energy efficiency measures that are not cost-effective, the company also notes that providing these exceptions can contribute to the disconnect in planned and actual energy efficiency acquisitions as reflected in Staff's comments in the context of PacifiCorp's 2017 IRP. This is particularly true for the major

¹ *In the Matter of PacifiCorp d/b/a Pacific Power, 2017 Integrated Resource Plan*, Docket No. LC-67, Staff Final Comments at 31 (Oct. 6, 2017).

² *Id.* at 32.

measures being considered by the Commission at this time, which could represent a significant amount of program savings.³

PacifiCorp does not object to the Commission granting the measure cost-effectiveness exceptions recommended by Staff, but the company encourages the Commission to consider the impact these measure exceptions have on least-cost planning, the ETO's actual resource acquisition relative to PacifiCorp's IRPs, and the cost to customers to fund major measures that are not cost-effective.

If you have questions about this filing, please contact Natasha Siores, Manager, Regulatory Affairs, at (503) 813-6583.

Sincerely,

A handwritten signature in black ink, appearing to read 'Etta Lockey', with a long horizontal flourish extending to the right.

Etta Lockey
Vice President, Regulation

³ *In the Matter of Energy Trust of Oregon, Cost Effectiveness Exceptions Requests for Electric Measures*, Docket No. UM 1696, Staff Memo at 4 (Oct. 5, 2017).

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Comments on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

UM 1696

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Dated this 26th day of October, 2017.



Katie Savarin
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