



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

December 26, 2017

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

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

Attn: Filing Center

RE: Docket UM 1639(5)—PacifiCorp's Application for Reauthorization of Deferred Accounting Related to a Reduction in Depreciation Expense

PacifiCorp d/b/a Pacific Power submits for filing its Application for Reauthorization of Deferred Accounting Related to Open Access Transmission Tariff.

It is respectfully requested that all formal data requests to the company regarding this filing be addressed to the following:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Please contact me with any informal inquiries at (503) 813-6583.

Sincerely,

A handwritten signature in black ink, appearing to read "Natasha Siores".

Natasha Siores
Manager, Regulatory Affairs

Enclosures

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Application for Reauthorization of Deferred Accounting of Revenues Related to Open Access Transmission Tariff on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

UE 263

OPUC Dockets (W)
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland, OR 97205
dockets@oregoncub.org

Robert Jenks (W) (C)
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland, OR 97205
Bob@oregoncub.org

Donald W. Schoenbeck (W) (C)
Regulatory & Cogeneration Services Inc
900 Washington St, Suite 780
Vancouver, WA 98660-3455
dws@r-c-s-inc.com

Irion A. Sanger (W) (C)
Sanger Law PC
1117 SE 53rd Ave
Portland, OR 97215
irion@sanger-law.com

Michael T. Weirich (W) (C)
Department of Justice
Business Activities Section
1162 Court St. NE
Salem, OR 97301-4096
Michael.weirich@state.or.us

Kevin Higgins (W)
Energy Strategies
215 State St., Suite 200
Salt Lake City, UT 84111-2322
Khiggins@energystat.com

Sarah Link (W) (C)
Pacific Power
825 NE Multnomah St., Ste. 1800
Portland, OR 97232
sarah.link@pacificcorp.com

Oregon Dockets (W)
Pacific Power
825 NE Multnomah St., Suite 2000
Portland, OR 97232
oregondockets@pacificcorp.com

Marianne Gardner (W) (C)
Oregon Public Utility Commission
PO Box 1088
Salem, OR 97308-1088
Marianne.gardner@state.or.us

Katherine A. McDowell (W) (C)
McDowell Rackner & Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
Katherine@mcd-law.com

Douglas C. Tingey (W)
Portland General Electric
121 SW Salmon 1WTC13
Portland, OR 97204
Doug.tingey@pgn.com

Greg Bass (W)
Noble Americas Energy Solutions, LLC
401 West A Street, Suite 500
San Diego, CA 92101
gbass@noblesolutions.com

Jay Tinker (W)
Portland General Electric
121 SW Salmon 1WTC-0702
Portland, OR 97204
Pge.opuc.filings@pgn.com

Gregory M. Adams (W)
Richardson & O'Leary
PO Box 7218
Boise, ID 83702
greg@richardsonadams.com

Kurt J. Boehm (W)
Jody Kyler Cohn (W)
Boehm Kurtz & Lowry
36 E. Seventh Street, Suite 1510
Cincinnati, OH 45202
kboehm@bkllawfirm.com
jkyler@bkllawfirm.com

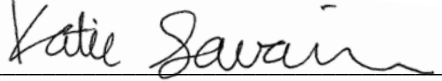
Samuel L. Roberts (W) (C)
Hutchinson, Cox, Coons, Orr & Sherlock, P.C.
777 High St Suite 200
PO Box 10886
Eugene, OR 97440
sroberts@eugenelaw.com

Tracy Rutten (W)
League of Oregon Cities
1201 Court Street NE, Suite 200
Salem, OR 97301
trutten@orcities.org

Nona Soltero (W)
Fred Meyer Stores/Kroger
3800 SE 22nd Avenue
Portland, OR 97202
Nona.soltero@fredmeyer.com

Steve W. Chriss (W) (C)
Wal-Mart Stores, Inc.
2001 SE 10th Street
Bentonville, AR 72716
stephen.chriss@wal-mart.com

Dated this 26th of December, 2017.



Katie Savarin
Coordinator, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1639(5)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Reauthorization of Deferred
Accounting of Revenues Related to Open Access
Transmission Tariff.

**APPLICATION FOR
REAUTHORIZATION OF
DEFERRED ACCOUNTING**

1

I. INTRODUCTION

2

3

4

5

6

7

8

9

In accordance with ORS 757.259(2)(e) and OAR 860-027-0300, PacifiCorp d/b/a Pacific Power applies to the Public Utility Commission of Oregon (Commission) for an order reauthorizing deferral of Oregon's allocated share of incremental Open Access Transmission Tariff (OATT) revenue associated with PacifiCorp's transmission rate case, Docket No. ER11-3643, at the Federal Energy Regulatory Commission (FERC). PacifiCorp respectfully requests reauthorization for 12 months beginning January 1, 2018.

II. CONTACT INFORMATION

Communications regarding this application should be addressed to:

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

Matthew McVee
Chief Regulatory Counsel
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232
Phone: 503-813-5582
Email: matthew.mcvee@pacificorp.com

10

11

12

In addition, PacifiCorp requests that all data requests regarding this application be sent to the following:

By email (preferred): datarequest@pacificorp.com

1 By regular mail: Data Request Response Center
2 PacifiCorp
3 825 NE Multnomah St., Suite 2000
4 Portland, OR 97232

5 Informal questions may be directed to Natasha Siores, Manager, Regulatory Affairs,
6 at 503-813-6583.

7 **III. BACKGROUND**

8 On May 26, 2011, PacifiCorp filed a rate case with FERC, docket ER11-3643,
9 including revisions to its OATT under section 205 of the Federal Power Act. In its filing, the
10 company sought to increase its annual transmission revenue requirement and the rates for
11 various ancillary services included in the OATT.¹

12 On March 1, 2012, PacifiCorp filed its 2012 Oregon general rate case, docket
13 UE 246.² One component used in determining the company’s requested revenue increase
14 was OATT revenues received from third parties, treated as an offset to revenue requirement
15 for PacifiCorp’s retail customers. The transmission rates used to calculate this revenue offset
16 were established in accordance with a June 6, 1996, settlement of PacifiCorp’s 1995 FERC
17 transmission rate case, docket ER96-8-000.

18 A stipulation settling many of the issues in docket UE 246 was filed with the
19 Commission on July 12, 2012, and approved by the Commission on December 20, 2012.
20 The partial stipulation included PacifiCorp’s agreement to file for deferred accounting of
21 Oregon’s allocated share of any incremental OATT revenue associated with the FERC rate
22 case not reflected in docket UE 246. PacifiCorp filed an application for deferred accounting
23 in accordance with the partial stipulation on December 28, 2012. The Commission approved

¹ On February 22, 2013, PacifiCorp filed a settlement agreement in its FERC rate case. FERC approved the settlement on May 23, 2013.

² *In the Matter of PacifiCorp d/b/a Pacific Power Request for a General Rate Revision*, Docket UE 246, Order No. 12-493 (December 20, 2012).

1 the company's application in Order No. 13-045, issued in docket UM 1639 on February 12,
2 2013.³

3 PacifiCorp is requesting reauthorization of the deferral of the incremental OATT
4 revenues from January 1, 2018, through December 31, 2018.

5 **IV. OAR 860-027-0300(4)**

6 Exhibit B provides the descriptions and explanations of the total amounts deferred
7 from January 1, 2017, through November 30, 2017. Confidential Exhibit C provides the
8 projected calculation for the amounts to be deferred through December 31, 2017 and during
9 the 12 months beginning January 1, 2018, if this application is approved. Confidential
10 Exhibit C is being provided under separate cover in accordance with OAR 860-001-0070.

11 If this application for reauthorization of deferred accounting is approved, the deferred
12 revenues will be recorded in FERC account 254 – Other Regulatory Liabilities. If this
13 application is denied, the revenues will be recorded in FERC account 456 – Other Electric
14 Revenues.

15 **V. NOTICE**

16 A Notice of PacifiCorp's Application for Reauthorization of Deferred Accounting of
17 Revenues Related to Open Access Transmission Tariff is included as Exhibit A. This notice
18 will be served to the service list in docket UM 1639.

19 **VI. CONCLUSION**

20 PacifiCorp respectfully requests that the Commission authorize the company to
21 continue deferring the Oregon-allocated share of any incremental OATT revenue resulting

³The Commission previously granted reauthorization in Order No. 14-023, issued January 22, 2014, Order No. 15-020, issued January 28, 2015, Order No. 16-040, issued January 26, 2016, and Order No. 17-106 issued March 21, 2017.

1 from the resolution of the Company's FERC rate case beginning January 1, 2018, and
2 continuing through December 31, 2018.

3

Respectfully submitted this 26th day of December, 2017.

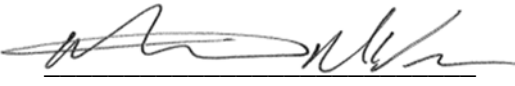
By: 
Matthew McVee
Chief Regulatory Counsel
PacifiCorp d/b/a Pacific Power

EXHIBIT A

EXHIBIT A
NOTICE
BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1639(5)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Reauthorization of Deferred
Accounting Related to Open Access Transmission
Tariff.

NOTICE OF
APPLICATION FOR
REAUTHORIZATION OF
DEFERRED ACCOUNTING

On December 26, 2017, PacifiCorp d/b/a Pacific Power filed an application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing deferral of Oregon's allocated share of incremental Open Access Transmission Tariff revenue associated with PacifiCorp's transmission rate case, Docket No. ER11-3643, at the Federal Energy Regulatory Commission. PacifiCorp respectfully requests reauthorization for 12 months beginning January 1, 2018. To obtain a copy of the application, contact the following:

Oregon Dockets
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
E-mail: 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 26, 2017.

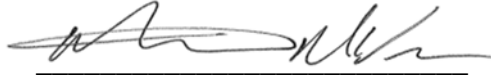
By: 
Matthew McVee
Chief Regulatory Counsel
PacifiCorp d/b/a Pacific Power

EXHIBIT B

PacifiCorp

Oregon - 2017 Wheeling Revenue Deferral
(S)

Assumptions: Using CY 2017 Actuals from Ernie Knudsen (Dec 17 is forecast)
Using Factors from OR 2017 TAM - UE-307

	2017 January	2017 February	2017 March	2017 April	2017 May	2017 June	2017 July	2017 August	2017 September	2017 October	2017 November
UE-263 Non-Firm Revenues (SAP 301922)	a	946,456	946,456	946,456	946,456	946,456	946,456	946,456	946,456	946,456	946,456
Updated Forecast Results											
301922 Non-firm		515,660	516,375	515,111	1,896,831	2,686,172	2,525,362	1,517,307	657,086	864,356	954,939
302821 I/C Sierra		-	-	-	-	-	-	-	-	-	-
302822 I/C Nevada		-	-	-	97,011	55,756	24,671	-	-	-	-
302991 S-T Transmission Refund		-	-	-	-	-	-	-	-	-	-
Total Updated Forecast Results	b	515,660	516,375	515,111	1,993,842	2,741,929	2,550,034	1,517,307	657,086	864,356	954,939
Total Company Decrease/(Increase) from UE-263		430,796	430,081	431,345	(1,047,385)	(1,795,472)	(1,603,577)	(570,850)	289,371	82,100	(8,482)
Oregon SE Allocation Factor		23.7572%	23.7572%	23.7572%	23.7572%	23.7572%	23.7572%	23.7572%	23.7572%	23.7572%	23.7572%
Oregon-Allocated Decrease/(Increase)	c	102,345	102,175	102,476	(248,830)	(426,554)	(380,965)	(135,618)	68,746	19,505	(2,015)
UE-263 Wheeling Revenues	d	4,815,265	4,815,265	4,815,265	4,815,265	4,815,265	4,815,265	4,815,265	4,815,265	4,815,265	4,815,265
Updated Forecast Results											
Long-term:											
301912-network		1,333,962	1,049,927	749,785	1,986,966	450,200	1,072,473	992,715	1,025,380	897,119	1,030,888
302980-pt-to-pt		1,967,391	2,091,154	2,090,098	2,233,352	2,535,236	2,571,338	2,876,229	2,667,140	2,667,140	2,511,021
301913-true-up Refunds		-	-	-	-	-	(16,598)	107,835	(14,704)	(93)	6
302981-Transmission Resales to others		64,636	64,636	65,585	64,636	64,636	64,636	69,698	69,698	69,698	69,698
302982-Transmission Unreserved Use		50	509	13,673	2,314	239	5,654	3,686	12	1,311	107
302983-Transmission Deferral Fees		-	-	-	-	-	-	-	-	-	-
301916-Legacy		643,129	648,596	645,688	636,022	624,498	639,049	648,118	660,964	656,138	692,297
Wheeling Revenue Adjustment Prior to Deferral Period		-	-	-	-	-	-	-	-	-	-
301917-Legacy		1,619,321	977,832	1,628,013	1,087,273	1,822,623	2,888,783	2,607,479	2,660,801	2,890,068	1,233,131
301926-Short-Term firm		61,829	67,684	67,246	189,998	278,827	155,702	161,707	90,559	70,618	276,949
302811-Short-Term firm Sierra		-	-	-	-	-	-	-	-	-	-
302812-Short-Term firm Nevada		-	-	-	-	-	-	-	-	-	-
302901-Use of facilities		1,128,386	1,128,385	1,128,379	1,131,694	1,128,376	1,128,385	1,128,368	1,128,387	1,140,797	1,128,739
302831 - I/C Other Wheel. Sierra		3,133	1	3,013	(1,194)	3,013	3,013	3,013	3,013	3,013	3,013
302961 - Capacity Resale		(8)	(208)	16	244	-	-	-	-	-	-
302962 - Capacity Resale		-	-	-	-	-	-	-	-	-	-
302990- L-T Transmission Rev Subject to Refund		-	-	-	-	-	-	-	-	-	-
302991 S-T Firm Transmission Rev Subject to Refund		-	-	-	-	-	-	-	-	-	-
Total Updated Forecast Results	e	6,821,829	6,028,515	6,391,697	7,331,304	6,907,647	8,512,434	8,598,848	8,291,250	8,395,808	7,101,967
Total Company Decrease/(Increase) from UE-263		(2,006,564)	(1,213,251)	(1,576,432)	(2,516,040)	(2,092,383)	(3,697,169)	(3,783,583)	(3,475,985)	(3,580,543)	(2,286,703)
Oregon SG Allocation Factor		25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%
Oregon-Allocated Decrease/(Increase)	f	(506,263)	(306,107)	(397,739)	(634,805)	(527,915)	(932,808)	(954,611)	(877,003)	(903,383)	(576,943)
UE-263 Ancillary Transmission Revenues	g	47,212	47,212	47,212	47,212	47,212	47,212	47,212	47,212	47,212	47,212
Updated Forecast Results:											
301952 - Schedule 6 - Supplemental		-	-	-	-	-	-	-	-	-	-
301962-Schedule 2-Reactive Supply		-	-	-	-	-	-	-	-	-	-
301964-Schedule 3a-regulating		-	-	-	-	-	-	-	-	-	-
301966-Primary Delivery		42,439	40,118	48,338	34,928	40,554	58,787	17,808	46,885	47,910	43,684
301967-Schedule 1-scheduling		153,334	125,379	143,740	190,112	206,213	231,596	217,940	184,982	196,015	153,390
302091 -I/C Sierra Sch 1		-	-	-	-	-	-	-	-	-	-
302082-I/C Nevada Power Sch 1		-	-	-	2,492	1,456	628	-	-	-	-
301968-Schedule 3-regulating		-	-	-	-	-	-	409,180	742,405	575,417	1,247,654
301972-Schedule 5 spinning		-	-	-	-	-	-	-	-	-	-
305910 - Sch 1 - Rev Subject to Refund		-	-	-	-	-	-	-	-	-	-
305920 - Sch 2 - Rev Subject to Refund		-	-	-	-	-	-	-	-	-	-
305930 - Sch 3 - Rev Subject to Refund		-	-	-	-	-	-	-	-	-	-
305931 - Sch 3a - Rev Subject to Refund		-	-	-	-	-	-	(409,180)	(496,852)	(255,102)	(521,339)
305950 - Sch 5 - Rev Subject to Refund		-	-	-	-	-	-	-	-	-	-
305960 - Sch 6 - Rev Subject to Refund		-	-	-	-	-	-	-	-	-	-
Total Updated Forecast Results:	h	195,773	165,498	192,079	227,532	248,223	291,010	235,747	231,867	243,925	197,074
Total Company Decrease/(Increase) from UE-263		(148,561)	(118,286)	(144,867)	(180,321)	(201,011)	(243,799)	(188,536)	(184,655)	(196,713)	(149,862)
Oregon SG Allocation Factor		25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%
Oregon-Allocated Decrease/(Increase)	i	(37,483)	(29,844)	(36,550)	(45,495)	(50,716)	(61,511)	(47,568)	(46,589)	(49,631)	(37,811)
UE-263 Ancillary (C&T)	j	275,229	275,229	275,229	275,229	275,229	275,229	275,229	275,229	275,229	275,229
Updated Forecast Results:											
301953-Schedule 6 - supplemental		107,222	139,233	139,006	163,423	180,115	209,806	239,925	245,765	220,467	234,748
301963-Schedule 2-Reactive		67,641	53,491	55,125	93,062	116,612	108,935	87,560	70,235	74,930	59,157
302091 -I/C Sierra		-	-	-	-	-	-	-	-	-	-
302092 -I/C Nevada		-	-	-	1,796	1,033	443	-	-	-	-
301969 - Schedule 3-regulating		334,979	208,583	256,748	304,042	237,239	395,669	350,050	361,545	379,846	212,818
301973-Schedule 5 - spinning		210,602	236,717	204,046	211,076	139,692	130,941	146,700	195,358	188,535	46,747
301974-Schedule 3a-Regulating		68,620	75,820	91,766	80,966	68,182	68,441	92,364	117,105	105,669	79,694
Total Updated Forecast Results:	k	789,063	711,845	746,690	854,364	742,872	914,235	916,599	890,008	969,447	633,165
Total Company Decrease/(Increase) from UE-263		(513,834)	(436,616)	(471,461)	(579,135)	(467,643)	(639,006)	(641,370)	(614,778)	(694,218)	(357,936)
Oregon SG Allocation Factor		25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%	25.2303%
Oregon-Allocated Decrease/(Increase)	l	(129,642)	(110,160)	(118,951)	(146,118)	(117,988)	(161,223)	(161,820)	(155,111)	(175,153)	(90,308)
Total Company Wheeling Revenue in Rates (UE-263)¹	a+d+g+j	6,084,162	6,084,162	6,084,162	6,084,162	6,084,162	6,084,162	6,084,162	6,084,162	6,084,162	6,084,162
Total 2016 Updated Forecast Wheeling Revenue	b+e+h+k	8,322,325	7,422,233	7,845,578	10,407,043	10,640,670	12,267,713	11,268,501	10,070,211	10,473,536	8,887,145
Total Decrease/(Increase) from UE-263		(2,238,163)	(1,338,071)	(1,761,416)	(4,322,881)	(4,556,509)	(6,183,551)	(5,184,339)	(3,986,049)	(4,389,374)	(2,802,983)
Total Oregon-Allocated Wheeling Revenue Decrease/(Increase)	c+f+i+l	(571,042)	(343,936)	(450,765)	(1,075,248)	(1,123,173)	(1,536,508)	(1,299,617)	(1,009,956)	(1,108,663)	(707,077)

CONFIDENTIAL EXHIBIT C

This exhibit is confidential in its entirety and is provided under separate cover in accordance with OAR 860-001-0070