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Portland, Oregon 97232

January 21, 2020

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: UE 263—PacifiCorp's Motion for to Amend Order No. 13-474

PacifiCorp d/b/a Pacific Power hereby submits for filing its Motion to Amend Order No. 13-474.

Please direct any inquiries about this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-6583.

Sincerely,

Etta Lockey
Vice President, Regulation

Enclosure

cc: Service List—UE 263

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 263

In the Matter of
PACIFICORP d/b/a PACIFIC POWER,
Request for a General Rate Revision

**MOTION TO AMEND
ORDER NO. 13-474**

INTRODUCTION

PacifiCorp d/b/a Pacific Power (PacifiCorp) consistent with ORS 756.568 respectfully requests the Public Utility Commission of Oregon (Commission) amend Order No. 13-474. Order No. 13-474 made certain adjustments to the Transition Adjustment Mechanism (TAM) Guidelines around the timing of the TAM filing. PacifiCorp now requests that the Commission allow a one-time modification of this order to allow PacifiCorp to file the TAM at an earlier date than what is described in the TAM guidelines. This one-time modification will allow PacifiCorp to align the TAM filing with the general rate case (GRC) filing. Due to the overlap in the two proceedings, and considering that TAM and GRC proceeding are processed concurrently when filed in the same year, it would promote judicial economy to allow PacifiCorp to file the TAM sixteen days earlier than required by the TAM guidelines.

BACKGROUND

The TAM is PacifiCorp's annual filing to update its net power costs in rates and to set the transition adjustments for customers who choose direct access during the open enrollment window in November. The timing for this filing was originally described in the TAM guidelines (adopted in 2009), and subsequently modified in PacifiCorp's 2013 general rate case to state that "Beginning January 1, 2015, if the Company files a general rate case between January 1 and

1 March 31, then the TAM will be filed the later of March 1 or the date of the general rate case
2 filing.”¹ PacifiCorp is currently planning on filing a GRC on February 14, 2020. Under the TAM
3 guidelines as adopted in 2009 and modified in 2013, this would require the TAM to be filed on
4 March 1, 2020.

5 **PROPOSED MODIFICATION**

6 PacifiCorp respectfully requests that the Commission approve a one-time modification of
7 Order No. 13-474 to provide for the following:

- 8 1) Allow PacifiCorp to make the 2021 TAM filing on the same date as the GRC filing if
9 that date is before March 1, 2020.

10 This one-time modification is consistent with the procedures surrounding the TAM which is
11 processed concurrently with a general rate case when PacifiCorp files a GRC before March 31 of
12 a given year.² Filing on the same date promotes judicial economy by facilitating intervenor
13 review and allowing a single procedural schedule to be adopted for both cases. Since many of the
14 net power cost inputs described in the TAM are utilized in the preparation of the revenue
15 requirement for the GRC, filing these two cases on the same date facilitates the review by the
16 parties for both filings. Additionally, since these two proceedings are processed concurrently,
17 making both filings on the same date allows the Commission to adopt a single procedural
18 schedule for both proceedings so that they may be processed concurrently.³ PacifiCorp is
19 authorized to represent that the following parties do not oppose the modifications proposed in

¹ Order No. 13-474 at 6.

² *Id.* at 6.

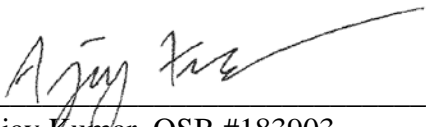
³ Staff takes no position at this time as to whether a single schedule for both the TAM and the GRC is appropriate.

1 this motion: the Staff of the Public Utility Commission of Oregon, the Citizens' Utility Board,
2 the Alliance of Western Energy Consumers, and Calpine Energy Solutions, LLC.

3 **CONCLUSION**

4 For the reasons described in this motion, PacifiCorp respectfully requests the
5 Commission adopt the one-time modification to Order No. 13-474 proposed in this motion so
6 that the TAM may be filed on the same date as the GRC.

Respectfully submitted this 21st day of January, 2020.

By: 
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