

March 11, 2024

VIA ELECTRONIC FILING

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

Re: Docket UM 1764(7)—PacifiCorp’s Application for Reauthorization of Deferred Accounting Related to a Change in Annual Regulatory Fees Payable to the Public Utility Commission of Oregon

PacifiCorp d/b/a Pacific Power submits for filing its Application for Reauthorization of Deferred Accounting Related to a Change in Annual Regulatory Fees Payable to the Public Utility Commission of Oregon.

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

Please direct any informal inquiries 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 1764(7)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Authorization of Deferred Accounting Related to a Change in Annual Regulatory Fees Payable to the Public Utility Commission of Oregon.

**APPLICATION FOR
REAUTHORIZATION OF
DEFERRED ACCOUNTING**

I. INTRODUCTION

In accordance with Oregon Revised Statutes (ORS) 757.259(2)(e) and Oregon Administrative Rules (OAR) 860-027-0300, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) applies to the Public Utility Commission of Oregon (Commission) for an order reauthorizing deferral of the increase in the annual regulatory fee due to the Commission-ordered increase in the annual fee rate to 0.45 percent. For administrative ease, PacifiCorp also requests to amortize the deferred amounts through its existing property sales balancing account.

PacifiCorp requests to defer costs associated with the increase in the annual fee rate until the increase in the annual fee rate is included in the Company's base rates.¹

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

Carla Scarsella
Deputy General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: carla.scarcella@pacificorp.com

¹ In accordance with OAR 860-027-0300, PacifiCorp will file for reauthorization of the deferral, as necessary.

In addition, PacifiCorp 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, Manager, Regulatory Affairs, at (503) 813-5934.

III. BACKGROUND AND SUMMARY OF REQUEST

In accordance with OAR 860-021-0033, electric utilities are required to pay regulatory fees to the Commission each year by April 1. The fee payable by the electric utility is an annual fee rate multiplied by the utility's gross operating revenues derived within Oregon for the previous calendar year. The annual fee rate is set by Commission order entered on or around March 1 of each year.

PacifiCorp initially applied for deferral of the change in annual fee rate level from the previous 0.25 percent maximum rate on March 11, 2016, docketed as UM 1764.² In that docket, PacifiCorp requested the use of deferred accounting for the costs related to the change in annual fee rate from the previous 0.25 percent maximum rate, then represented in PacifiCorp's rates, and the annual fee rate established for 2016 of 0.275 percent in Order No. 16-067. The Commission authorized Staff's recommendation and approved the deferral for the 12-month period beginning March 11, 2016, in Order No. 16-153. Staff's recommendation supported PacifiCorp's decision to amortize the deferred amounts through

² Senate Bill (SB) 329, enacted in 2015, allows the Commission to set the annual fee to a percentage not to exceed 0.3 percent of utilities' gross operating revenue.

its existing property sales balancing account and also recommended that deferred amounts not be subject to an earnings test. PacifiCorp has filed for annual reauthorizations since, which the Commission has approved. The most recent update to the annual fee occurred on February 24, 2022, in Order No. 22-062, which increased the annual fee rate from 0.35 percent to 0.43 percent. On February 23, 2023, the Commission reaffirmed the annual fee rate for 2023 at 0.43 percent of 2022 gross operating revenues in Order No. 23-057.

On February 22, 2024, the Commission issued Order No. 24-054, setting the annual fee rate for 2024 at 0.45 percent of 2023 gross operating revenues. PacifiCorp respectfully requests reauthorization under ORS 757.259(2)(e) to defer the costs related to the increase in the annual fee rate for the 12-month period beginning March 11, 2024, and to amortize these costs through PacifiCorp's tariff Schedule 96, Property Sales Balancing Account.³ Further, because the collection and payment of the annual fee is a direct pass-through to the Commission, PacifiCorp proposes that this deferral not be subject to an earnings test.

IV. DEFERRAL OF COSTS

PacifiCorp respectfully requests reauthorization under ORS 757.259(2)(e) to continue deferral of the increase in the annual regulatory fee due to the Commission-ordered increase in the annual fee rate to 0.45 percent for the 12 months beginning March 11, 2024. As required by OAR 860-027-0300(3) and (4), PacifiCorp provides the following:

A. Description of Utility Expense

PacifiCorp is requesting to defer approximately \$333,333 in 2024 associated with the increase in the regulatory fee rate for 2024, calculated as shown in the following table. This

³ The Company's property sales balancing account is evaluated and reported annually to the Commission. Any rate changes necessary to the property sales balancing account will be requested and determined in a subsequent filing.

amount reflects the calculated difference between PacifiCorp’s annual fee at the new rate of 0.45 percent and the annual fee of 0.43 percent included in the Company’s Oregon rates. The 0.43 percent annual fee approved in Order No. 22-062 was included in base rates in PacifiCorp’s previous general rate case, docket UE 399. The Commission authorized to continue the rate in Order No. 23-057. PacifiCorp will incorporate the new rate of 0.45 percent approved in Order No. 24-054 in its pending general rate case, docket UE 433, in reply testimony.

| | Current Rate per Order No. 24-054 | Previous Rate per Order No. 23-057 | Estimated for deferral |
|------------------------|-----------------------------------|------------------------------------|------------------------|
| 2023 Revenues* | \$1,666,666,667 | \$1,666,666,667 | |
| Annual Fee Rate | 0.45% | 0.43% | |
| Annual Regulatory Fee* | \$7,500,000 | \$7,166,667 | \$333,333 |

** 2023 revenues are preliminary estimates; PacifiCorp has not yet released its final 2023 results.*

B. Reasons for Deferral

As discussed above, PacifiCorp requests reauthorization to defer the costs associated with the increase in the annual regulatory fee rate that is higher than the previous statutory-maximum rate. ORS 757.259(2)(e) allows the deferral of identifiable utility expenses to minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately the costs borne and received by customers. In this application PacifiCorp seeks to match the costs borne by and benefits received by customers. The concurrent proposal to amortize deferred amounts through the existing property sales balancing account also provides for administrative efficiency by minimizing the rate changes required to address the change in annual fees.

C. Proposed Accounting

If this application is approved, PacifiCorp will record deferred amounts by crediting Commission fees recorded in FERC Account 928—Regulatory Commission Expenses and

debiting the property sales balancing account, in FERC Account 254—Other Regulatory Liabilities. If this application is denied, the increase in regulatory fees will remain in Regulatory Commission Expenses, FERC Account 928.

D. Estimate of Amounts

The Company estimates that the Oregon cost related to the increase in the annual fee rate is \$333,333 for the 2023 annual fee that will be paid on or before April 1, 2024.

E. Notice

A copy of the Notice of Application is included as Exhibit A. This notice will be served to the service list in dockets UE 399 and UE 433.

F. Entries in the Deferred Account to Date

Exhibit B provides the current history of PacifiCorp’s Oregon property sales balancing account.

G. Reasons for Continuation of Deferred Accounting

Reauthorization of deferred accounting will allow PacifiCorp to continue to match the costs borne and benefits received by customers. The concurrent proposal to amortize deferred amounts through the existing property sales balancing account also provides for administrative efficiency by minimizing the rate changes required to address the change in annual fees.

V. CONCLUSION

For the reasons set forth above, PacifiCorp respectfully requests that, in accordance with ORS 757.259(2)(e), the Commission authorize the Company to defer the costs described in this application, and to amortize these costs through tariff Schedule 96, Property Sales Balancing Account.

Respectfully submitted this 11th day of March, 2024.


By: 
Carla Scarsella
Deputy General Counsel
PacifiCorp d/b/a Pacific Power

Exhibit A

Notice of Application

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1764(7)**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Reauthorization of Deferred Accounting Related to a Change in Annual Regulatory Fees Payable to the Public Utility Commission of Oregon.


**NOTICE OF
APPLICATION FOR
REAUTHORIZATION OF
DEFERRED ACCOUNTING**

On March 11, 2024, PacifiCorp d/b/a Pacific Power filed an application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing the use of deferred accounting for the costs associated with the Commission-ordered change in the annual regulatory fee percentage. The granting of this application 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
PacifiCorp
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 with 25 days of the filing of the application.

Respectfully submitted on March 11, 2024.

By: 
Carla Scarsella
Deputy General Counsel
PacifiCorp d/b/a Pacific Power

CERTIFICATE OF SERVICE

I certify that a true and correct copy of **PacifiCorp's Notice of Application in Docket No. UM 1764** was served on the parties listed below via electronic delivery in compliance with OAR 860-001-0180.

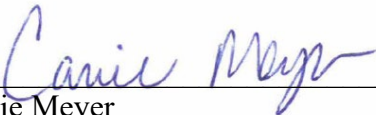
Service List UE 433

| PACIFICORP | |
|---|--|
| PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com | CARLA SCARSELLA (C) PACIFICORP 825 NE MULTNOMAH ST STE 2000 PORTLAND, OR 97232 carla.scarsella@pacificorp.com |
| STAFF | |
| 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 | BETSY BRIDGE (C) OREGON DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM, OR 97301-4796 betsy.bridge@doj.state.or.us |
| MATTHEW MULDOON (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308 matt.muldoon@state.or.us | |
| CUB | |
| JENNIFER HILL-HART (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 jennifer@oregoncub.org | BOB JENKS (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 bob@oregoncub.org |
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| <p>CALPINE SOLUTIONS</p> | |
| <p>GREGORY M. ADAMS 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 ENERGY STRATEGIES LLC 215 STATE ST - STE 200 SALT LAKE CITY, UT 84111-2322 khiggins@energystrat.com</p> | |
| <p>KWUA</p> | |
| <p>KWUA KLAMATH WATER USER ASSOCIATION KLAMATH BASIN WATER USER PROTECTIVE ASSOCIATION 2312 SOUTH SIXTH STREET, STE A KLAMATH FALLS OR 97601 assist@kwua.org</p> | <p>PAUL S. SIMMONS (C) SOMACH SIMMONS & DUNN 500 CAPITOL MALL, STE 1000 SACRAMENTO, CA 95814 psimmons@somachlaw.com</p> |
| <p>VITESSE LLC</p> | |
| <p>KYLE MOORE META PLATFORMS, INC. 1 HACKER WAY MENLO PARK, CA 94025 kyletmoore@meta.com</p> | <p>IRION A SANGER SANGER LAW PC 4031 SE HAWTHORNE BLVD PORTLAND, OR 97214 irion@sanger-law.com</p> |
| <p>JONI L SLIGER SANGER LAW PC 4031 SE HAWTHORNE BLVD PORTLAND, OR 97214 joni@sanger-law.com</p> | |
| <p>FRED MEYER</p> | |
| <p>JUSTIN BIEBER FRED MEYER/ENERGY STRATEGIES LLC 215 SOUTH STATE STREET, STE 200 SALT LAKE CITY, UT 84111 jbieber@energystrat.com</p> | <p>KURT J BOEHM BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 kboehm@bkllawfirm.com</p> |

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|---|---|
| <p>JODY KYLER COHN BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 jkylersohn@bklawfirm.com</p> | |
| AMAZON DATA SERVICES | |
| <p>DEREK D. GREEN DAVIS WRIGHT TREMAINE LLP 1300 SW FIFTH AVE STE 2400 PORTLAND, OR 97201 derekgreen@dwt.com</p> | <p>OLIVIER JAMIN DAVIS WRIGHT TREMAINE LLP 1300 SW FIFTH AVE STE 2400 PORTLAND, OR 97201 olivierjamin@dwt.com</p> |

Dated this 11th day of March, 2024.



Carrie Meyer
Adviser, Regulatory Operations

CERTIFICATE OF SERVICE

I certify that a true and correct copy of **PacifiCorp's Notice of Application in docket UM 1764** was served on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

Service List UE 399

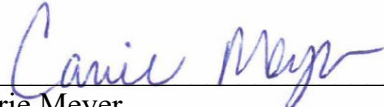
| PACIFICORP | |
|---|---|
| PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com | KATHERINE A MCDOWELL (C) MCDOWELL RACKNER & GIBSON PC 419 SW 11TH AVE., SUITE 400 PORTLAND, OR 97205 katherine@mrg-law.com |
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| TYLER C PEPPLER (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND, OR 97201 tcp@dvclaw.com | |

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| GREGORY M. ADAMS (C) RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE, ID 83702 greg@richardsonadams.com | GREG BASS CALPINE ENERGY SOLUTIONS, LLC 401 WEST A ST, STE 500 SAN DIEGO, CA 92101 greg.bass@calpinesolutions.com |
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| JODY KYLER COHN (C) BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 jkylercohn@bklawfirm.com | |

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| SBUA | |
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| DIANE HENKELS (C) SMALL BUSINESS UTILITY ADVOCATES 621 SW MORRISON ST. STE 1025 PORTLAND, OR 97205 diane@henkelslaw.com | |

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| VITESSE | |
| DENNIS BARTLETT (C) META PLATFORMS, INC. 1 HACKER WAY MENLO PARK, CA 94025 dbart@meta.com | |
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| WALMART | |
| VICKI M BALDWIN (C) PARSONS BEHLE & LATIMER 201 S MAIN ST STE 1800 SALT LAKE CITY, UT 84111 vbaldwin@parsonsbehle.com | |
| ALEX KRONAUER (C) WALMART alex.kronauer@walmart.com | STEVE W CHRISS (C) WAL-MART STORES, INC. 2001 SE 10TH ST BENTONVILLE, AR 72716-0550 stephen.chriss@wal-mart.com |

Dated this 11th day of March, 2024.



 Carrie Meyer
 Adviser, Regulatory Operations

Exhibit B

Entries in the Deferred Account to Date

OR Gain/Loss on Sale of Property

| | | | |
|-----------------|-------------|---------------|--------------|
| Interest | Rate | Period | Order |
| | 5.13% | 2023 | UM 1147 |
| | 5.40% | 2024 | UM 1147 |

| Period | Beginning Balance | Gain | Commision | Amortization | Interest | Ending Balance |
|----------------------|--------------------------|---------------------|----------------------|-----------------------|-------------------|-----------------------|
| Jan-23 | 2,844,651.65 | - | 93,025.00 | - | 12,359.73 | 2,950,036.37 |
| Feb-23 | 2,950,036.37 | - | 93,025.00 | - | 12,810.25 | 3,055,871.62 |
| Mar-23 | 3,055,871.62 | - | 93,025.00 | - | 13,262.69 | 3,162,159.31 |
| Apr-23 | 3,162,159.31 | - | - | - | 13,518.23 | 3,175,677.54 |
| May-23 | 3,175,677.54 | - | - | - | 13,576.02 | 3,189,253.56 |
| Jun-23 | 3,189,253.56 | - | - | - | 13,634.06 | 3,202,887.62 |
| Jul-23 | 3,202,887.62 | - | - | - | 13,692.34 | 3,216,579.97 |
| Aug-23 | 3,216,579.97 | (209,095.18) | - | (91,280.05) | 13,108.83 | 2,929,313.56 |
| Sep-23 | 2,929,313.56 | - | - | (497,637.89) | 11,990.96 | 2,443,666.63 |
| Oct-23 | 2,443,666.63 | - | - | (212,148.79) | 9,967.08 | 2,241,484.92 |
| Nov-23 | 2,241,484.92 | - | - | (192,229.29) | 9,147.75 | 2,058,403.38 |
| Dec-23 | 2,058,403.38 | - | - | (217,272.06) | 8,318.40 | 1,849,449.72 |
| FY 2023 TOTAL | | (209,095.18) | \$ 279,075.00 | (1,210,568.09) | 145,386.34 | |
| Jan-24 | 1,849,449.72 | - | - | (273,207.71) | 7,322.42 | 1,583,564.42 |
| Feb-24 | 1,583,564.42 | - | - | (289,642.58) | 6,474.34 | 1,300,396.18 |
| FY 2024 TOTAL | | - | \$ - | (562,850.30) | 13,796.76 | |