



Oregon

Kate Brown, Governor

Public Utility Commission

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October 6, 2020



BY EMAIL

PacifiCorp, dba Pacific Power

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RE: Advice No. 20-012

At the public meeting on October 6, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1189. The Staff Report, a receipted copy of the sheets in your advice filing, and the LSN are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: October 6, 2020**

REGULAR **CONSENT** **EFFECTIVE DATE** October 7, 2020

DATE: September 30, 2020

TO: Public Utility Commission

FROM: Curtis Dlouhy, Scott Gibbens, and Moya Enright

THROUGH: Bryan Conway, John Crider, and Matt Muldoon **SIGNED**

SUBJECT: PACIFIC POWER:
(Docket No. ADV 1189/Advice No. 20-012)
Requests updates with less than statutory notice to Rule 13: Line Extensions, to waive costs of Temporary Service for those affected by 2020 wildfires.

STAFF RECOMMENDATION:

Staff recommends that the Public Utility Commission of Oregon (Commission) approve Pacific Power's (PacifiCorp, PAC, or Company) Advice No. 20-012, which temporarily waives the costs of Temporary Service in Rule 13 for those affected by 2020 wildfires, on less than statutory notice, for service rendered on and after October 7, 2020.

DISCUSSION:

Issue

Whether the Commission should approve PacifiCorp's Advice No. 20-012, which temporarily waives the costs of Temporary Service in Rule 13 for those affected by 2020 wildfires, on less than statutory notice, for service rendered on and after October 7, 2020.

Applicable Law

The Commission may approve tariff changes if they are deemed fair, just, and reasonable. ORS 757.210. Tariff revisions may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0025. Filings that propose any change in rates, tolls, charges, rules, or

regulations must be filed with the Commission at least 30 days before the effective date of the change. See ORS 757.220; OAR 860-022-0020. The Commission may allow changes on less than 30 days' notice for good cause shown. ORS 757.220.

Analysis

Background

On September 29, 2020, PacifiCorp filed Advice No. 20-012 requesting an update to its Rule 13, Section V.E. – Temporary Service. The purpose of the filing is to update its Tariff Rule to temporarily waive the costs of establishing temporary service for those impacted by 2020 wildfires.

Tariff Rule 13, Line Extensions, Section V. E., Temporary Service currently provides that customers requesting temporary service to a service loop must pay a Temporary Service charge that ranges from \$85 to \$115, and all customers that require more than a connection of a service loop are required to pay additional Temporary Service costs for the installation and removal of related equipment.

In this filing, PacifiCorp proposes to make a minor change to Rule 13, Section V.E. to waive all fees associated with setting up temporary service for those affected by the unprecedented 2020 wildfires through June 30, 2021.

If approved, customers affected by wildfires will have Temporary Service charges waived. Any municipalities or agencies of municipal, county, state, or federal government, or non-governmental organization providing temporary centralized locations for mobile housing will also have their Temporary Service costs waived. Any interested party would have to request service no later than June 30, 2021, and would still be responsible for electric service under the appropriate rate schedule.¹

PacifiCorp would treat all waived charges as an incremental cost associated with wildfire damages and restoration and proposes to record the waived charges in the deferral account requested in Docket No. UM 2116, which is PacifiCorp's request to defer expenses related to the 2020 wildfires. Docket No. UM 2116 is still subject to Commission approval, and approval of this rule change does not prejudice the Commission's determination in that proceeding.

Because the requested effective date for the requested tariff change is less than 30 days from the date of filing, the Company also requests Commission action for good cause shown on less than statutory notice. The Company claims states that it has "started to receive requests from customers and communities impacted by the

¹ Page 3 of PacifiCorp's initial application filed on September 29, 2020.

devastating wildfires that started in early September 2020.”² PacifiCorp hopes to implement this waiver of statutory notice so that it may quickly implement the tariff change and can more quickly assist affected communities. Given the unprecedented nature of the wildfires and the need to extend temporary service to customers affected, Staff finds that there is good cause to approve the requested tariff change on less than statutory notice.

Staff Analysis

Staff has reviewed the Company’s filing and rationale, and finds that PacifiCorp’s requested change to Rule 13, with less than statutory notice, is a fair and reasonable way to assist in the recovery from the 2020 wildfires in a timely manner. Staff takes no position in this memo on the appropriateness of PacifiCorp’s requested wildfire deferral (UM 2116).

Conclusion

Staff is satisfied that the changes proposed in Rule 13, Section V.E.: Temporary Service are fair, just, and reasonable.

PROPOSED COMMISSION MOTION:

Approve PacifiCorp’s Advice No. 20-012, which temporarily waives the costs of Temporary Service in Rule 13 for those affected by 2020 wildfires, on less than statutory notice, for service rendered on and after October 7, 2020.

² Page 7 of PacifiCorp’s initial application filed on September 29, 2020.

V. Extension Exceptions (continued)

D. Intermittent Service Facilities

The Company will serve Intermittent loads provided the Consumer advances the estimated cost of facilities above the cost of facilities which the Company would otherwise install. The Consumer also must pay a Contract Minimum Billing for as long as service is taken, but in no case less than five years. If load fluctuations become a detriment to other Consumers, the Company may modify the facilities and adjust the Contract Minimum Billing.

E. Temporary Service

For Temporary Service requests requiring only a service loop connection and where there are 120/240 volt facilities of adequate capacity available, the Applicant shall pay the Temporary Service charge specified in Schedule 300.

For all other Temporary Service requests the Applicant shall pay:

- a) the estimated installation cost, plus
- b) the estimated removal cost, plus
- c) the estimated cost for rearranging any existing facilities, less
- d) the estimated salvage value of the facilities required to provide Temporary Service.

The Applicant is also responsible for electric service supplied under the appropriate rate schedule; any advances required for sharing previous Extensions; and, depending on the customer class, Contract Minimum Billings.

If a temporary Consumer takes service continuously for 60 consecutive months from the date the Company first delivered service, the Company will classify them as permanent and refund any payment the Consumer made over that required of a permanent Consumer. The Company will not refund the Facilities Charges.

In response to the 2020 wildfires, the Company may waive the costs of Temporary Service to facilitate service restoration at an affected property and to make Temporary Service available for displaced residential customers at a temporary location. Provided, however, the Applicant requests service no later than June 30, 2021. The Applicant remains responsible for electric service supplied under the appropriate rate schedule and any advances required for sharing previous Extensions.

(N)
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(N)

VI. Relocation or Replacement of Facilities

A. Relocation of Facilities

If requested by an Applicant or Consumer, and adequate clearances can be maintained and adequate easements/rights-of-way can be obtained, the Company will: relocate distribution facilities; and/or, replace existing overhead distribution facilities with comparable underground (overhead to underground conversion, or conversion). If existing easements are insufficient for the new facilities, the Applicant is responsible for obtaining new easements. Substation facilities and transmission voltage facilities will be relocated at the discretion of the Company.

For conversions, the new underground system must not impair the use of the remaining overhead system. The Applicant or Consumer must elect either: to provide all trenching and back filling, imported backfill material, conduits, and equipment foundations that the Company requires for the Extension; or, to pay the Company to provide these items.

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(M12)

VI. Relocation or Replacement of Facilities (continued)

In addition, for both relocations and conversions, the Applicant must advance the following:

(M11)

1. The estimated installed cost of the new facilities plus the estimated removal expense of the existing facilities, less
2. The estimated salvage value of the removed facilities.

This Advance is not refundable. The Company is not responsible for allocating costs and responsibilities among multiple Applicants.

(M11)

B. Local Governments – Relocations

When Company facilities located in the franchise easement require relocating due to a public project, the relocation is done without charge to the local government Applicant.

C. Local Governments – Conversions

The conversion costs to a local government Applicant, as part of a public project which would necessitate the relocation of Company's facilities, consist of: the costs of all necessary excavating, road crossings, trenching, backfilling, raceways, ducts, vaults, transformer pads, and other devices peculiar to underground service. If the conversion is not part of a public project necessitating relocation of Company's facilities the overhead retirement costs are included in the conversion costs charged to the local government. The overhead retirement costs are: the original cost, less depreciation, less salvage value, plus removal costs of the existing overhead distribution facilities no longer used or useful by reason of the conversion.

In addition the local government shall by ordinance or other means provide that all Consumers, served from the overhead facilities to be removed, perform wiring changes on their Premises so the service may be furnished from the underground distribution system in accordance with the Company's rules, and have authorized the Company to discontinue its overhead service upon completion of the underground conversion.

The Company will not charge the local government if the total conversion costs incurred by the Company during one calendar year for conversions does not exceed five-one hundredths of one percent (0.05%) of the Company's annual revenues derived from Consumers residing within the boundaries of the local government. Otherwise the local government shall, in advance, either pay the conversion costs or direct the Company to expense the conversion costs. When expensed said conversion shall be conditioned by the following:

1. Company shall collect the conversion costs from the Consumers located within the boundaries of the local government; however, the local government may direct Company to collect conversion costs from only a portion of the Consumers located within the boundaries of the local government.
2. Conversion costs incurred by the Company shall be accumulated in a separate account in Company's books with interest accruing from the date Company incurs the cost. The rate of such interest shall be equal to the effective cost of the senior security issue which most recently preceded the incurrence of the cost.

(M13)

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VI. Relocation or Replacement of Facilities (continued)

C. Local Governments – Conversions (continued)

3. Company shall collect the conversion costs and interest over a reasonable period of time subject to approval of The Public Utility Commission of Oregon. Said pay-back shall not exceed the depreciable life of the facilities. Collection shall begin as soon as practicable after the end of the year in which the conversion costs are incurred.
4. Conversion costs to be recovered from each Consumer shall be calculated by applying a uniform percentage to each Consumer's total monthly bill for service rendered within the boundaries of the local government. Said conversion costs will be shown as a separate item on individual Consumer bills.

(M12)

(M12)

VII. Contract Administration Credit

Applicants may waive their right to receive refunds on a Line Extension advance. Applicants who waive this right will receive a Contract Administration Credit up to the amount specified in Schedule 300. The Applicant's choice to receive the Contract Administration Credit must be made at the time the Extension advance is paid.

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LESS THAN STATUTORY NOTICE APPLICATION

ADV 1189

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at puc.filingcenter@state.or.us.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

| | | |
|---|------------------|---|
| IN THE MATTER OF THE APPLICATION OF PacifiCorp d/b/a Pacific Power _____ (UTILITY COMPANY) |)))) | UTILITY L.S.N. APPLICATION NO. <u>2268</u> _____ (LEAVE BLANK) |
| TO WAIVE STATUTORY NOTICE. | | |

NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.

1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)
 The purpose of this filing is to modify the language in Rule 13, Line Extensions, Section V, Extension Exceptions, Subsection E, Temporary Service, to include a temporary exemption to waive PacifiCorp's Temporary Service requirements through June 30, 2021, for customers and communities impacted by the devastating wildfires that started in early September 2020.

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)
 First Revision of Sheet No. R13-11, Section E, Temporary Service
 Original Sheet No. R13-12, Section E, Temporary Service
 Original Sheet No. R13-13, Section E, Temporary Service

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)
 Second Revision of Sheet No. R13-11, Section E, Temporary Service
 First Revision of Sheet No. R13-12, Section E, Temporary Service
 First Revision of Sheet No. R13-13, Section E, Temporary Service

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:
 PacifiCorp has started to receive requests from customers and communities impacted by the devastating wildfires that started in early September 2020 to establish temporary service so they may rebuild their homes or businesses or to provide a location for temporary mobile housing. The Company is requesting a waiver of statutory notice so tht it may quickly implement the requested tariff changes that will allow for customers and communities impacted by the wildfires to rebuild and meet basic housing needs without the additional impact of the Temporary Service charge and Temporary Service costs.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): **October 7, 2020**

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| . AUTHORIZED SIGNATURE | TITLE Vice President, Regulation | DATE 9/29/20 |
| PUC USE ONLY | | |
| <input checked="" type="checkbox"/> APPROVED <input type="checkbox"/> DENIED | EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE <p style="text-align: center; color: blue;">October 7, 2020</p> | |
| AUTHORIZED SIGNATURE | DATE <p style="text-align: right; color: blue;">10/06/2020</p> | |