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Portland, Oregon 97232

March 22, 2022

VIA ELECTRONIC FILING

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

RE: UE 399, UM 1964, UM 2134, UM 2142, UM 2167, UM 2185, UM 2186 – Motion to Consolidate

PacifiCorp d/b/a Pacific Power submits for filing its Motion to Consolidate in the above-referenced dockets.

Informal inquiries may be directed to Cathie Allen, Manager, Regulatory Affairs, at (503) 813-5934.

Sincerely,

Shelley McCoy
Director, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 399, UM 1964, UM 2134, UM 2142, UM 2167, UM 2185, UM 2186

In the Matter of PACIFICORP d/b/a PACIFIC POWER, Application for a General Rate Revision
In the Matter of PACIFICORP d/b/a PACIFIC POWER, Deferred Accounting for PacifiCorp's Transportation Electrification Program
In the Matter of PACIFICORP d/b/a PACIFIC POWER, Deferred Accounting for costs associated with Cedar Springs 2
In the Matter of PACIFICORP d/b/a PACIFIC POWER, Deferred Accounting for costs associated with Cholla Unit 4 property taxes
In the Matter of PACIFICORP d/b/a PACIFIC POWER, Deferred Accounting for revenues associated with Renewable Energy Credits (RECs) from Pryor Mountain
In the Matter of PACIFICORP d/b/a PACIFIC POWER, Deferred Accounting for costs associated with Non-Contributory Defined Benefit Pension Plans

MOTION TO CONSOLIDATE

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

Deferred Accounting for the costs associated
with the TB Flats Wind Project

I. INTRODUCTION

In accordance with OAR 860-001-0600, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) respectfully requests a ruling from the Public Utility Commission of Oregon (Commission) consolidating the deferral applications identified below with PacifiCorp’s recently filed general rate case, docket UE 399 (2023 Rate Case) in order to determine the appropriate ratemaking treatment for these deferrals.

II. ARGUMENT

On March 1, 2022, PacifiCorp filed an application for a general rate revision, and through that filing has identified a series of deferrals for which the Company is seeking to consolidate into that proceeding. By consolidation, PacifiCorp is seeking to determine ratemaking treatment for these open deferral applications.¹ PacifiCorp has identified the following deferrals for which the Company seeks ratemaking treatment:

- Docket UM 1964, Deferred Accounting for PacifiCorp’s Transportation Electrification Program;²
- Docket UM 2134, Deferred Accounting for costs associated with Cedar Springs 2;³

¹ *In the Matter of PacifiCorp d/b/a Pacific Power, Application for a General Rate Revision*, Docket No. UE 399, Exhibit PAC/100, Steward/13-14 (Mar. 1, 2022).

² *In the Matter of PacifiCorp dba Pacific Power Application for Approval of Deferred Accounting for a Balancing Account Related to PacifiCorp’s Transportation Electrification Program*, Docket No. UM 1964, Application filed July 27, 2018 (corrected on Jan. 27, 2022), reauthorizations filed on Mar. 24, 2020 (corrected on Jan. 27, 2022) and Mar. 23, 2021 (corrected on Jan. 27, 2022).

³ *In the Matter of PacifiCorp dba Pacific Power Application for Approval of Deferred Accounting for Costs Relating to a Renewable Resource Pursuant to ORS 469A.120*, Docket No. UM 2134, Application filed Dec. 10, 2020.

- Docket UM 2142, Deferred Accounting for costs associated with Cholla Unit 4 property taxes;⁴
- Docket UM 2167, Deferred Accounting for revenues associated with RECs from Pryor Mountain;⁵
- Docket UM 2185, Deferred Accounting for costs associated with Non-Contributory Defined Benefit Pensions Plans;⁶ and
- Docket UM 2186, Deferred Accounting for the costs associated for the TB Flats Wind Project.⁷

Consolidation of these deferrals will promote judicial and administrative efficiency by allowing these proposals to be considered by the Commission for both the required prudence review and incorporated into the rate changes that will occur at the conclusion of the proceeding. The consolidation, consideration, and proposed amortization of these deferrals through the 2023 Rate Case is consistent with the requirements of Oregon law, which requires it to occur in a proceeding under ORS 757.210 that changes rates, and upon review of the utility's earnings at the time of the amortization of the deferral.⁸ PacifiCorp's 2023 Rate Case is a rate change proceeding under ORS 757.210, and a review of PacifiCorp's earnings will occur during the pendency of this proceeding.⁹ Therefore, it is appropriate to consolidate and consider these deferrals into PacifiCorp's 2023 Rate Case at this time.

⁴ *In the Matter of PacifiCorp dba Pacific Power Application for Approval of Deferred Accounting for Cholla Unit 4-Related Property Tax Expense*, Docket No. UM 2142, Application filed Dec. 24, 2020.

⁵ *In the Matter of PacifiCorp dba Pacific Power Application for Approval of Deferred Accounting for Revenues Associated with RECs from Pryor Mountain*, Docket No. UM 2167, Application filed May 13, 2021.

⁶ *In the Matter of PacifiCorp dba Pacific Power Application for Approval of Deferred Accounting and Accounting Order Related to Non-Contributory Defined Benefit Pensions Plans*, Docket No. UM 2185, Application filed July 27, 2021.

⁷ *In the Matter of PacifiCorp dba Pacific Power Application for Approval of Deferred Accounting for Costs Related to a Renewable Resource Pursuant to ORS 469A.120*, Docket No. UM 2186, Application filed July 27, 2021.

⁸ ORS 757.259(5).

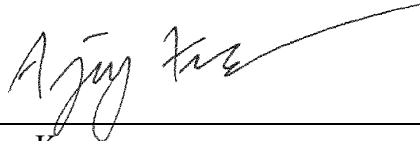
⁹ *In the Matter of PacifiCorp d/b/a Pacific Power, Application for a General Rate Revision*, Docket No. UE 399, Advice No. 22-002 (Mar. 1, 2022).

The Commission has discretion to consolidate cases under OAR 860-001-0600. In the past, the Commission has exercised this discretion when consolidation was the most efficient and logical approach,¹⁰ and when consolidation would clarify the record and simplify resolution of cases.¹¹ As described above, consolidation of these cases is efficient, logical, and would simplify the resolution of these cases.

III. CONCLUSION

To promote judicial and administrative efficiency, PacifiCorp respectfully requests that the Commission consolidate the requested deferral proceedings with PacifiCorp's 2023 Rate Case.

Respectfully submitted this 22nd day of March, 2022.



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¹⁰ *In re Portland General Electric and In re PacifiCorp*, Dockets UA 37 and UA 41, Order No. 92-557 (Apr. 16, 1992).

¹¹ *In the Matter of the Petition of Idaho Power Company; Amortization in Rates of Certain Deferred Excess Net Power Supply Expenses*, Dockets UE 123 and UE 131, Order No. 02-440 (July 8, 2002).