



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

September 3, 2021

VIA ELECTRONIC FILING

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

RE: UM _____ — PacifiCorp's Application for a Pre-Filed Emergency Deferral Account

Pursuant to ORS 757.259(2)(e), OAR 860-027-0300, and Commission Order No. 21-259, PacifiCorp d/b/a Pacific Power (PacifiCorp) submits for filing its application to establish a pre-filed emergency deferral account for costs associated with declared emergencies.

PacifiCorp respectfully requests that all communications related to this filing be addressed to:

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

Matthew McVee
Chief Regulatory Counsel
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
matthew.mcvee@pacificorp.com

Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com

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

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**

UM _____

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
Application for a Pre-Filed Emergency Deferral
Account.

**APPLICATION FOR A PRE-FILED
EMERGENCY DEFERRAL
ACCOUNT**

I. INTRODUCTION

Under ORS 757.259 and OAR 860-027-0300, and Public Utility Commission of Oregon (Commission) Order No. 21-259,¹ PacifiCorp d/b/a Pacific Power (PacifiCorp) requests an order authorizing PacifiCorp to establish a pre-filed emergency deferral account (Emergency Deferral Account). The Emergency Deferral Account will track expenses proximately caused by an emergency that is the subject of a state or federal declaration. After establishment of the Emergency Deferral Account, within 30-days following an actual state of declared emergency PacifiCorp would file a letter notifying the Commission that it is activating the deferral by describing the emergency event, the general impacts to utility systems as a result of the event, and any estimate of expenses, if available. PacifiCorp will seek amortization of the deferred costs in the Emergency Deferral Account in a future Commission proceeding.

In support of this Application, PacifiCorp states:

II. NOTICE

Communications regarding this application should be addressed to:

¹ *In the matter of Public Utility Commission of Oregon, Pre-Filed Emergency Deferral Applications*, Order No. 21-259 (Aug. 12, 2021).

Oregon Dockets
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
oregondockets@pacificorp.com

Matthew McVee
Chief Regulatory Counsel
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
matthew.mcvee@pacificorp.com

In addition, PacifiCorp requests that all information 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 of Regulatory Affairs, at (503) 813-5934.

III. OAR 860-027-0300(3) REQUIREMENTS

A. Description

PacifiCorp seeks authorization from the Commission to defer, for future amortization, actual costs related to declared emergencies in Oregon. In Order No. 21-259, the Commission approved the recommendation of the Administrative Hearings Division in docket UM 2181, inviting utilities to file applications to establish pre-filed emergency deferral accounts to streamline recovery efforts after emergency events, natural disasters, and extreme weather that may create significant impacts to utility systems.²

PacifiCorp's Emergency Deferral Account will only track expenses proximately caused by an emergency that is the subject of a state or federal declaration.

² Id. at Appendix A.

B. Reasons for Deferral

PacifiCorp requests this deferral under ORS 757.259(2)(e). This deferral will match appropriately the costs borne by and benefits received by customers and will minimize the frequency of rate changes or the fluctuation of rate levels or match appropriately the costs borne by and benefits received by customers.

C. Proposed Accounting

PacifiCorp proposes to record the deferral as a regulatory asset in FERC Account 182.3 (Other Regulatory Assets), crediting the FERC accounts where the expenses would otherwise be recorded, such as FERC 593 (Distribution Overhead Line Maintenance). In the absence of a deferred accounting order, the costs would remain in these expense accounts.

D. Estimate of Amounts

PacifiCorp does not currently have an estimate of the potential amounts to be deferred. To the extent it is available, an estimate of the amounts associated with a particular emergency would be included in PacifiCorp's letter notifying the Commission that it is activating the deferral filed within 30 days of the declaration.

E. Notice

A copy of the Notice of Application for a Pre-Filed Emergency Deferral Account and a list of persons served with the notice are included with this filing as Exhibit A.

IV. REAUTHORIZATION

In accordance with Order No. 21-259, if authorized, the Emergency Deferral Account would not have to be reauthorized. However, once PacifiCorp files a notice indicating it is recording amounts in the Emergency Deferral Account, the authority to record amounts

related to the specific emergency expires 12 months from the date of the emergency declaration unless reauthorized under the procedures of OAR 860-027-0300(4).

V. CONCLUSION

Authorization of a pre-filed emergency deferral account is appropriate, just, and reasonable. For the reasons stated above, PacifiCorp requests authorization to establish an Emergency Deferral Account for deferral of costs associated with declared emergencies beginning September 3, 2021.

Respectfully submitted this 3rd day of September, 2021.

By:



Matthew McVee, OSB #020735
Chief Regulatory Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
PHONE: (503) 813-5585
EMAIL: matthew.mcvee@pacificorp.com
Attorney for PacifiCorp

EXHIBIT A

NOTICE

EXHIBIT A
NOTICE
BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM _____

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
Application for a Pre-Filed Emergency Deferral
Account.

**APPLICATION FOR A PRE-FILED
EMERGENCY DEFERRAL
ACCOUNT**

On September 3, 2021, PacifiCorp d/b/a Pacific Power (PacifiCorp) filed an application with the Public Utility Commission of Oregon (Commission) for an order authorizing PacifiCorp to establish a pre-filed emergency deferral account (Emergency Deferral Account) in accordance with Oregon Revised Statutes (ORS) 757.259(2)(e) and Oregon Administrative Rules (OAR) 860-027-0300. The Emergency Deferral Account will track expenses proximately caused by an emergency that is the subject of a state or federal declaration. After establishment of the Emergency Deferral Account, within 30-days following an actual state of declared emergency PacifiCorp would file a letter notifying the Commission that it is activating the deferral.

In accordance with Commission Order No. 21-259, if authorized, the Emergency Deferral Account would not have to be reauthorized. However, once PacifiCorp files a notice indicating it is recording amounts in the Emergency Deferral Account, the authority to record amounts related to the specific emergency expires 12 months from the date of the emergency declaration unless reauthorized under the procedures of OAR 860-027-0300(4).

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 who wishes to submit written comments to the Commission must do so within 25 days of the date of PacifiCorp's application.

Respectfully submitted on September 3, 2021.

By:



Matthew McVee
Chief Regulatory Counsel

CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of PacifiCorp's **Notice of Application for a Pre-Filed Emergency Deferral Account** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

Service List UE 374

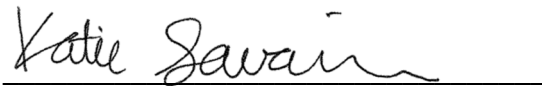
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Dated this 3rd day of September, 2021.



Katie Savarin
Coordinator, Regulatory Operations