

Unless subject to an automatic adjustment clause under ORS 757.210(1), amounts deferred are allowed in rates to the extent authorized by the Commission in a proceeding under ORS 757.210 to change rates and upon review of the utility's earnings at the time of application to amortize the deferral.

Analysis

Background

In Order No. 21-259, the Commission approved the recommendation of the Administrative Hearings Division in Docket No. UM 2181 to invite utilities to establish pre-filed emergency deferral accounts.¹ Under the Commission's order, utilities may file applications to establish emergency deferral accounts to streamline recovery efforts after emergency events, natural disasters, and extreme weather that may create significant impacts to utility systems. Under Order No. 21-259, the utility may use the emergency deferral account to track only 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 because 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.

The emergency deferral accounts themselves do not have to be renewed every twelve months. However, to the extent the utility uses the account to defer cost related to a federal or state emergency, the deferral authority will last no more than twelve months after the date the utility files the notice of deferral, unless re-authorized by the Commission.

Reason for deferral

PacifiCorp requests the Commission authorize this account under ORS 757.259(2)(e) and Order No. 21-259.

Description of Expenses

PacifiCorp cannot estimate potential amounts to be deferred. To the extent, it is available; an estimate of the amounts associated with a particular emergency would be

¹ *In re Pre-Filed Deferral Applications* (UM 2181), Order No. 21-259, Public Meeting Date: August 10, 2021.

included in PacifiCorp's letter notifying the Commission that it is activating the deferral filed within 30 days of the declaration.

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.

Conclusion

Staff concludes PacifiCorp's application meets the requirements of ORS 757.259 and Commission Order No. 21-259. The Company should be allowed to establish a pre-filed emergency deferral account. The Company has reviewed this memo and agrees with its contents.

PROPOSED COMMISSION MOTION:

Approve PacifiCorp's application to establish a pre-filed emergency deferral account beginning September 3, 2021.