

August 12, 2022

VIA ELECTRONIC FILING

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

Re: ADV 1412/Advice No. 22-008, Docket No. UE 409 — Replacement Pages - Schedule 7 Low Income Discount and Schedule 92 Low Income Discount Cost Recovery Adjustment Revisions

PacifiCorp d/b/a Pacific Power submits the following substitute tariff sheets to the Oregon Public Utility Commission (Commission or OPUC) under PacifiCorp’s Advice filing No. 22-008. On June 16, 2022, PacifiCorp filed original tariff sheets Schedule 7 – Low Income Discount to implement a low-income discount to qualifying customers, Schedule 92 – Low Income Discount Cost Recovery Adjustment to implement a cost recovery mechanism for the new low-income discount along with revisions to Tariff Index 3, Tariff Index 4 and Schedule 90 – Summary of Effective Rate Adjustments. At a public meeting on July 26, 2022, the Commission suspended the tariff filing, and directed PacifiCorp to return with a program that had differentiated tiers and considered a per customer site cap.¹ Following conversations with Commission Staff and stakeholders, including workshops held on August 1, 2022, and August 8, 2022, PacifiCorp submits modification and additions in this supplemental filing to Schedule 7 and Schedule 92 along with an updated effective date for all tariffs. PacifiCorp requests the enclosed tariff sheets replace the tariff sheets submitted on June 16, 2022, in their entirety. PacifiCorp respectfully requests an effective date of October 1, 2022.

Twenty-Eighth Revision of Sheet No. INDEX-3	Tariff Index	Table of Contents - Schedules
Eleventh Revision of Sheet No. INDEX-4	Tariff Index	Table of Contents – Schedules
Twenty-Eighth Revision of Sheet No. 90	Schedule 90	Summary of Effective Rate Adjustments
Original Sheet No. 7.1	Schedule 7	Low-Income Discount
Original Sheet No. 7.2	Schedule 7	Low-Income Discount
Original Sheet No. 92	Schedule 92	Low Income Discount Cost Recovery Adjustment

¹ See Order No. 22-290.

Modifications to Original Filed Tariff Sheets

Responsive to direction from the Commission and after collaboration with Commission Staff, Citizen's Utility Board, Alliance of Western Energy Consumers, Community Action Partnership of Oregon, Multnomah County of Sustainability, and other stakeholders, PacifiCorp has made several adjustments to the Company's originally filed low-income discount program.

The most significant change in PacifiCorp's originally filed low-income discount program is the tiered discount. PacifiCorp originally proposed a single tier discount of 25 percent to all eligible participants. Commission Staff and advocates requested a deeper, more equitable discount for participants with a lower percentage of state median income (SMI). PacifiCorp expressed concern initially with giving a larger discount while maintaining self-attestation of income, in order to help safeguard all other customers from potentially larger program costs and potential misuse of the program. However, after feedback from the Commission on the initial Advice Letter filing, the Company collaborated with stakeholders and Staff and has agreed to put in place a two-tier discount to provide low-income customers that have income at 0-20 percent of SMI a larger 40 percent discount and a 20 percent discount for customers who have income at 21-60 percent of SMI. Customers will still be allowed to self-attest to income to qualify for one of the two tiers.

Additionally, PacifiCorp updated the tariff language to indicate customers who receive low-income from LIHEAP and OEAP will automatically qualify for the 20 percent discount and will be allowed to self-attest at a later time to qualify for the 40 percent discount.

PacifiCorp's original filing allowed the Company to perform post-enrollment verification and was not specific to the random participation in the verification process. In light of the changes made to the tiered program, to remain consistent with the other utilities, and to help safeguard all customers, the Company plans to randomly select three percent of participating customers for post-enrollment verification. Prior to implementing a specific post-enrollment verification process, PacifiCorp will engage the stakeholders in this docket on how to best implement the post-enrollment verification process effectively and equitably.

PacifiCorp agrees to put in the tariff language indicating the program is risk free and customers will not be required to pay back the benefits they received. PacifiCorp has always considered that the program would be risk free and has no objection to making it clear in the Company's low-income discount tariff.

Finally, in response to the concerns voiced by Alliance of Western Energy Consumers (AWEC) regarding the implementation of a monthly per customer cap for the cost recovery surcharge, stakeholders agreed for this interim program to set a cap at five million kilowatt-hours per month, per customer. For the Company's largest customers, usage over five million kilowatt-hours each month will not be subject to the cost recovery surcharge. The five million kilowatt-hour cap represents a compromise between no cap as proposed by the Company and a \$1,000 cap proposed by AWEC. This change has been included in the proposed Schedule 92, Low-Income Discount Cost Recovery Adjustment. Making changes to the level of discount and including the 5,000,000 kWh per customer cap results in the Schedule 92 surcharge price being

slightly higher than the Company’s original filing. The surcharge would recover the costs of the bill credits through a \$0.36 per month price for residential customers and a 0.036 cents per kWh price for non-residential customers.

The changes made to Schedule 7 and Schedule 92 are summarized in the table below.

Table 1, Summary of Revised Tariff Changes

	Original Filing	Revised Filing
Tiered Discount	Single tier discount of 25% to all qualifying low-income customers who fall at or below 60% SMI.	Two-tiered approach with 40% discount at 0-20% SMI and 20% for 21-60% SMI.
Auto-Enrollment Tier	Low-income customers would be auto-enrolled into the discount	Low-income customers will be auto-enrolled on the 20% tier with the opportunity to attest to income and move to the 40% tier
Post-Enrollment Verification	The Company may choose to randomly select customers to provide post-enrollment verification	Company will randomly select 3% of enrolled customers to provide post-enrollment verification.
Risk Free	PacifiCorp's original filing didn't specifically address the risk free nature of the program.	Added verbiage to the program that customers are not required to pay back benefits received.
Surcharge Price	\$0.35 per month for residential; 0.035 cents per kWh for non-residential	\$0.36 per month for residential; 0.036 cents per kWh for non-residential
Surcharge Cap	No cap.	Monthly per customer cap of 5,000,000 kWh

The Company requests an effective date of October 1, 2022, which is approximately 30 days after the expected approval of this program. The Company was able to prepare in advance for implementation of its initial program proposal allowing for a quick effective date after Commission approval. In order to properly implement the amended program, the Company must update customer communications, employee training, the billing system and all necessary forms and online enrollment tools after the program design is finalized and approved by the Commission. These updates will take time, and it is important to complete all parts before the program is open to customers for enrollment and customers begin contacting the Company’s call center or looking on the Company’s website for program information. Opening the program to enrollment prematurely would cause confusion and frustration for customers.

Customer Impact

The revised year 1 forecast for the bill discount is approximately \$4.8 million, based on a projected participation level of 15 percent. As in the initial filing, administrative costs will be tracked separately in a deferral account and are not included in the proposed \$4.8 million cost recovery for Schedule 92. The low-income bill assistance balancing account will track the ongoing difference between the low-income discounts provided to customers under Schedule 7 and the amount recovered through Schedule 92, Low-Income Cost Recovery Adjustment. The amount recovered through Schedule 92 will be updated as needed through the automatic adjustment clause based on an analysis of the amount in the balancing account and the projected low-income discounts provided to customers.

To support this amended filing and meet the requirements of OAR 860-022-0025 and OAR 860-022-0030, the Company submits proposed tariffs listed above along with the following attachments:

Attachment 1: Proposed Cost Recovery Adjustment Rate Calculation

Attachment 2: Estimated Effect of Proposed Price Change

PacifiCorp estimates that approximately 646,000 customers will be impacted by the proposed cost recovery adjustment rate. The overall average rate increase is 0.4 percent. A residential customer will see a bill increase of \$0.36 per month. Low-income residential customers who are enrolled in the Low-Income Discount program will see a monthly bill decrease of 20 percent or 40 percent, dependent upon attested income. These discounts are not reflected in the rate impact table provided.

PacifiCorp appreciates working closely with Commission Staff, and stakeholders to help ensure that the Company's interim low-income discount program is successful and looks forward to continued conversations and collaboration with all the parties to study and improve the program over time.

The company requests that all formal information requests regarding this advice filing be addressed to:


By email (preferred): datarequest@pacificorp.com

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

ADV 1412/Advice No. 22-008, UE 409
Public Utility Commission of Oregon
August 12, 2022

Informal questions regarding this advice filing may be directed to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

A handwritten signature in blue ink that reads "Shelley McCoy". The signature is written in a cursive style.

Shelley McCoy
Director, Regulation

Enclosures

Attachment 1

Pacific Power
 State of Oregon
 Proposed Residential Low-Income Discount Cost Recovery Adjustment - Schedule 92

Initial annual cost estimate to be recovered \$ 4,837,371

Customer Class	Rate	Proposed Schedule 92	Revenue
Residential	\$0.36	per month	\$ 2,310,412
Non Residential			
		MWh	
Total*		8,569,862	
Monthly per Bill MWh Cap		5,000	
MWh Exceeding Cap		1,629,532	
Non Residential MWh Paying Surcharge	0.036	¢ per kWh	\$ 2,498,519
Total			\$ 4,808,931

*Includes direct access and distribution only customers.

Attachment 2

PACIFIC POWER
ESTIMATED EFFECT OF PROPOSED PRICE CHANGE
ON REVENUES FROM ELECTRIC SALES TO ULTIMATE CONSUMERS
DISTRIBUTED BY RATE SCHEDULES IN OREGON
FORECAST 12 MONTHS ENDED DECEMBER 31, 2023

Line No.	Description	Pre Sch No.	Pro Sch No.	No. of Cust	MWh	Present Revenues (\$000)			Proposed Revenues (\$000)			Change				Line No.			
						Base Rates	Adders ¹	Net Rates	Base Rates	Adders ¹	Net Rates	Base Rates (\$000)	% ²	Net Rates (\$000)	% ²				
						(8) + (7)			(9) + (10)			(12) - (6)		(13) - (11)		(14) - (8)		(15) - (10)	
Residential																			
1	Residential	4	4	535,059	5,633,856	\$597,063	\$9,738	\$606,801	\$597,063	\$12,050	\$609,113	\$0	0.0%	\$2,311	0.4%	1			
2	Total Residential			535,059	5,633,856	\$597,063	\$9,738	\$606,801	\$597,063	\$12,050	\$609,113	\$0	0.0%	\$2,311	0.4%	2			
Commercial & Industrial																			
3	Gen. Svc. < 31 kW	23	23	84,329	1,137,011	\$124,438	\$1,015	\$125,453	\$124,438	\$1,424	\$125,862	\$0	0.0%	\$409	0.3%	3			
4	Gen. Svc. 31 - 200 kW	28	28	10,462	1,992,271	\$163,732	\$9,197	\$172,929	\$163,732	\$9,914	\$173,646	\$0	0.0%	\$717	0.4%	4			
5	Gen. Svc. 201 - 999 kW	30	30	797	1,281,581	\$94,197	\$4,696	\$98,893	\$94,197	\$5,158	\$99,354	\$0	0.0%	\$461	0.5%	5			
6	Large General Service >= 1,000 kW	48	48	190	3,555,464	\$224,400	(\$15,394)	\$209,007	\$224,400	(\$14,619)	\$209,781	\$0	0.0%	\$775	0.4%	6			
7	Partial Req. Svc. >= 1,000 kW	47	47	6	29,109	\$3,974	(\$120)	\$3,854	\$3,974	(\$109)	\$3,865	\$0	0.0%	\$10	0.4%	7			
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	848	1	0	\$1,805	\$10	\$1,815	\$1,805	\$31	\$1,837	\$0	0.0%	\$22	1.2%	8			
9	Agricultural Pumping Service	41	41	7,997	263,565	\$29,194	(\$3,645)	\$25,549	\$29,194	(\$3,550)	\$25,644	\$0	0.0%	\$95	0.4%	9			
10	Total Commercial & Industrial			103,782	8,259,000	\$641,740	(\$4,241)	\$637,499	\$641,740	(\$1,751)	\$639,989	\$0	0.0%	\$2,490	0.4%	10			
Lighting																			
11	Outdoor Area Lighting Service	15	15	5,809	8,260	\$915	\$74	\$989	\$915	\$75	\$990	\$0	0.0%	\$1	0.1%	11			
12	Street Lighting Service Comp. Owned	51	51	1,108	23,893	\$3,498	\$387	\$3,885	\$3,498	\$390	\$3,888	\$0	0.0%	\$3	0.1%	12			
13	Street Lighting Service Cust. Owned	53	53	314	11,452	\$657	\$210	\$867	\$657	\$214	\$871	\$0	0.0%	\$4	0.5%	13			
14	Recreational Field Lighting	54	54	102	1,141	\$82	\$27	\$108	\$82	\$27	\$109	\$0	0.0%	\$0	0.4%	14			
15	Total Public Street Lighting			7,333	44,746	\$5,151	\$698	\$5,849	\$5,151	\$706	\$5,857	\$0	0.0%	\$8	0.1%	15			
16	Subtotal			646,174	13,937,602	\$1,243,954	\$6,196	\$1,250,150	\$1,243,954	\$11,005	\$1,254,959	\$0	0.0%	\$4,809	0.4%	16			
17	Employee Discount			966	13,030	(\$341)	(\$6)	(\$346)	(\$341)	(\$7)	(\$347)	\$0		(\$1)		17			
18	AGA Revenue					\$3,521		\$3,521	\$3,521		\$3,521	\$0		\$0		18			
19	COOC Amortization					\$1,767		\$1,767	\$1,767		\$1,767	\$0		\$0		19			
20	Total Sales with AGA			646,174	13,937,602	\$1,248,901	\$6,190	\$1,255,091	\$1,248,901	\$10,998	\$1,259,899	\$0	0.0%	\$4,808	0.4%	20			

¹ Excludes effects of the Low Income Bill Payment Assistance Charge (Sch. 91), BPA Credit (Sch. 98), Public Purpose Charge (Sch. 290) and System Benefits Charge (Sch. 291).

² Percentages shown for Schedules 48 and 47 reflect the combined rate change for both schedules

Proposed Tariffs

+Schedule No.

SUPPLY SERVICE	
200	Base Supply Service
201	Net Power Costs – Cost-Based Supply Service
210	Portfolio Time-of-Use Supply Service
211	Portfolio Renewable Usage Supply Service
212	Portfolio Fixed Renewable Energy– Supply Service
213	Portfolio Habitat Supply Service
218	Interruptible Service Pilot
220	Standard Offer Supply Service
230	Emergency Supply Service
247	Partial Requirements Supply Service
276R	Large General Service/Partial Requirements Service – Economic Replacement Power Rider Supply Service
ADJUSTMENTS	
90	Summary of Effective Rate Adjustments
91	Low Income Bill Payment Assistance Fund
92	Low Income Discount Cost Recovery Adjustment (N)
93	Independent Evaluator Cost Adjustment
94	Wildfire Mitigation and Vegetation Management Cost Recovery Adjustment
96	Property Sales Balancing Account Adjustment
97	Intervenor Funding Adjustment Cost Recovery Adjustment
98	Adjustment Associated with the Pacific Northwest Electric Power Planning and Conservation Act
101	Municipal Exaction Adjustment
103	Multnomah County Business Income Tax Recovery
104	Oregon Corporate Activity Tax Recovery Adjustment
194	Replaced Meter Deferred Amounts Adjustment
195	Federal Tax Act Adjustment
198	Deer Creek Mine Closure Deferred Amounts Adjustment
202	Renewable Adjustment Clause – Supply Service Adjustment
203	Renewable Resource Deferral – Supply Service Adjustment
204	Oregon Solar Incentive Program Deferral – Supply Service Adjustment
205	TAM Adjustment for Other Revenues
206	Power Cost Adjustment Mechanism – Adjustment
207	Community Solar Start-Up Cost Recovery Adjustment
270	Renewable Energy Rider – Optional
271	Energy Profiler Online – Optional
272	Renewable Energy Rider – Optional Bulk Purchase Option
290	Public Purpose Charge
291	System Benefits Charge
294	Transition Adjustment
295	Transition Adjustment – Three-Year Cost of Service Opt-Out
296	Transition Adjustment – Five-Year Cost of Service Opt-Out
299	Rate Mitigation Adjustment

Schedule No.

OTHER		
7	Low-Income Discount	(N)
8	EEAST On-Bill Repayment Program	
9	Residential Energy Efficiency Rider – Optional Weatherization Services – No New Service	
10	Voluntary On-Bill Repayment Program	
60	Company Operated Electric Vehicle Charging Station Service	
73	Large Customer Curtailment Option	(N)
106	Demand Response Programs	
115	Commercial and Industrial Energy Efficiency Retrofit Incentives – 20,000 Square Feet or Less– No New Service	
116	Commercial and Industrial Energy Efficiency Retrofit Incentives– No New Service	
117	Transportation Electrification Residential Charging Pilot	
118	Transportation Electrification Nonresidential Charging Pilot	
125	Commercial and Industrial Energy Services– No New Service	
126	Community Solar Program Interconnection and Power Purchase	
135	Net Metering Service – Optional for Qualifying Consumers	
136	Net Metering Option Volumetric Incentive Rate Pilot – Optional for Qualifying Customers	
137	Competitive Bid Option Volumetric Incentive Rate Pilot – Optional for Qualifying Customers	
293	New Large Load Direct Access Program – Cost Of Service Opt-Out	
300	Charges as Defined by the Rules and Regulations	
400	Special Contracts	
600	ESS Charges	

SUMMARY OF EFFECTIVE RATE ADJUSTMENTS

The following summarizes the applicability of the Company's adjustment schedules

SUMMARY OF EFFECTIVE RATE ADJUSTMENTS

Schedule	91	92	93	94	96	97	98*	104	194	195	198	202*	203*	204
4	x	x	x	x	x	x	x	x	x	x	x	x	x	x
5	x	x	x	x	x	x	x	x	x	x	x	x	x	x
15	x	x	x	x	x		x	x	x	x	x	x	x	x
23	x	x	x	x	x		x	x	x	x	x	x	x	x
28	x	x	x	x	x		x	x	x	x	x	x	x	x
30	x	x	x	x	x		x	x	x	x	x	x	x	x
41	x	x	x	x	x	x	x	x	x	x	x	x	x	x
47	x	x	x	x	x	x	x	x	x	x	x	x	x	x
48	x	x	x	x	x	x	x	x	x	x	x	x	x	x
51	x	x	x	x	x			x	x	x	x	x	x	x
53	x	x	x	x	x			x	x	x	x	x	x	x
54	x	x	x	x	x			x	x	x	x	x	x	x
60														
723	x	x	x	x	x		x	x	x	x	x	x	x	x
728	x	x	x	x	x		x	x	x	x	x	x	x	x
730	x	x	x	x	x		x	x	x	x	x	x	x	x
741	x	x	x	x	x	x	x	x	x	x	x	x	x	x
747	x	x	x	x	x	x	x	x	x	x	x	x	x	x
748	x	x	x	x	x	x	x	x	x	x	x	x	x	x
751	x	x	x	x	x			x	x	x	x	x	x	x
753	x	x	x	x	x			x	x	x	x	x	x	x
754	x	x	x	x	x			x	x	x	x	x	x	x
848	x	x		x				x						

(N)

(N)

*Not applicable to all consumers. See Schedule for details.

LOW-INCOME DISCOUNT COST RECOVERY ADJUSTMENT**Purpose**

The purpose of this Schedule is, in accordance with ORS 757.695, to collect funds for the electric low-income discount as specified in Schedule 7. This discount is enabled by House Bill 2475 (2021 regular sessions) which modified ORS 757.230 to allow for differentiated rates for “low-income customers and other economic, social equity, or environmental justice factors that affect affordability for certain classes of utility customers.” This adjustment schedule is implemented as an automatic adjustment clause as provided for in ORS 757.210.

Applicable

To all bills for electric service calculated under all tariffs and contracts.

Adjustment Rates

The applicable Adjustment Rates are listed below.

Schedule	Adjustment Rate
Residential Rate Schedules (4, 5, 6)	\$0.36 per month
Nonresidential Rate Schedules	0.036 cents per kWh for the first 5,000,000 kWh per month

(N)

(N)

LOW-INCOME DISCOUNT

Page 1

Purpose

The purpose of this Schedule is to implement the Low-Income Discount for income qualified Residential Customers.

This discount is enabled by House Bill 2475 (2021 regular sessions), which modified ORS 757.230 to allow for differentiated rates for “low-income customers and other economic, social equity, or environmental justice factors that affect affordability for certain classes of utility customers.”

Available

To Residential Customers served by the Company within its service territory.

Applicable

To income-qualified Residential Customers with gross household income at or below 60% of Oregon State Median Income (SMI) adjusted for household size. For Customers in single-person households, eligibility is extended to those with gross household incomes up to \$30,700.

Monthly Billing

Income-qualified Residential Customers will receive a monthly bill discount at one of two levels based on the Customer’s household income as a percentage of SMI for the Residential Service Schedule charges for that Customers (Schedule 4, 5, or 6). Customers with household incomes up to 20% of SMI will receive a 40% discount on their electricity bill and customers with household incomes between 21% and 60% will receive a 20% discount on their electricity bill. The monthly bill discount will be applied prior to taxes and will not apply to Schedule 300 charges.

(N)

(N)

(continued)

Special Conditions

1. Customers receiving Low Income Home Energy Assistance Program (LIHEAP) or Oregon Energy Assistance Program (OEAP) funds automatically qualify for the bill discount. Low-income customers automatically enrolled for the discount whose household size and income are unknown to the Company will be placed in the 21-60% SMI tier and receive the 20% discount. The Customer may provide income information to be moved to the 0-20% SMI tier and receive the 40% discount. Customers may also qualify for the bill discount by submitting an application self-declaring household size and income.
2. Household size reflects all permanent residents in the home, including adults and children.
3. Qualifying income refers to total gross annual income from all sources based on the number of persons in the household. Total gross income shall include income from all sources, both taxable and nontaxable.
4. The discount applies only to bills associated with the Customer's permanent primary residence and only to new charges billed after enrollment. Eligible Customers will receive the bill discount within one billing cycle of the receipt of application or receipt of LIHEAP/OEAP funds.
5. Re-enrollment will be required every two years. Customers receiving LIHEAP/OEAP will automatically be re-enrolled for two years following receipt of LIHEAP/OEAP funds.
6. The Company will randomly select 3% of enrolled Customers to provide post-enrollment verification to continue receiving this discount.
7. The Company may require post-enrollment verification from customers with excessive usage (greater than four times average residential customer usage) for them to continue receiving the discount.
8. It is the Customer's responsibility to notify the utility if there is a change in eligibility status.
9. If the Customer is removed from the program the Company will not seek to recover any benefits already provided to the Customer.

Reporting

The Company will track and report information regarding the low-income discount with the Commission on a quarterly basis for the first calendar year and annually thereafter. The report will include, at a minimum, the total number of Customers enrolled in the program, total dollars provided to customers, and dollars spent on administrative costs.

Rates and Regulations

Service under this schedule is subject to the General Rules and Regulations contained in the tariff of which this schedule is a part and to those prescribed by regulatory authorities.