

October 20, 2022

VIA ELECTRONIC FILING

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

RE: UE ___—Schedule 204 - Oregon Solar Incentive Program Deferral Supply Service Adjustment

In compliance with ORS 757.205, OAR 860-022-0025, OAR 860-022-0030, and ORS 757.210, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) provides the following information regarding Schedule 204 Oregon Solar Incentive Program Deferral Supply Service Adjustment (Schedule 204), of the Company's Tariff P.U.C. OR No. 36, which sets forth all rates, tolls, charges, rules, and regulations applicable to electric service in the State of Oregon.

The purpose of this filing is to request approval to amortize the deferral balance relating to dockets UM 1483(11) and UM 1483 (12) associated with PacifiCorp's costs for the Oregon Solar Incentive Program (OSIP) deferred during the 12 months ended September 30, 2022.¹ PacifiCorp has reviewed and revised rates for this purpose annually; the last filing was effective January 1, 2022.² As discussed below, the proposed change to the annual collection amount already in rates is minimal, therefore PacifiCorp is proposing no change to Schedule 204 for 2023.

During the OSIP program year, PacifiCorp deferred approximately \$3.5 million, excluding interest, for the 12 months ended September 30, 2022. The deferral includes costs for program administration, incentive payments, and meter costs. The total deferral balance also reflects offsetting credits for customer charges and an avoided energy value.

The total amount requested to be amortized in 2023 is \$3.7 million, which would be a slight decrease compared to the \$4.0 million approved for collection in 2022 in Advice No. 21-021. Due to the minimal change in the balance to be amortized, PacifiCorp proposes to leave the current Schedule 204 rates in effect for 2023 and proposes no change to the tariff at this time.

¹ UM 1483(11) was filed on May 18, 2021, and was approved at the Public Meeting on June 15, 2022.

UM 1483(12) was filed on May 18, 2022, and is pending Commission approval.

² Advice No. 10-022 was approved at the December 28, 2010, Public Meeting. Advice No. 11-019 was approved at the December 20, 2011, Public Meeting. Advice No. 12-019 was approved at the January 29, 2013, Public Meeting. Advice No. 13-019 was approved at the Public Meeting on January 21, 2014. Advice No. 14-012 was approved at the Public Meeting on December 16, 2014. Continuation of amortization at the rates set in Advice No. 14-012 was approved in docket UE 302 at the Public Meeting on January 26, 2016. Advice 16-014 was approved at the Public Meeting on December 20, 2016. Docket UE 334 was approved at the Public Meeting on December 18, 2017. Docket UE 351/Advice 18-007 was approved at the Public Meeting on December 18, 2018. Advice No. 19-016 was approved at the Public Meeting on December 17, 2019. Continuation of amortization at the rates set in Advice No. 19-016 was approved in docket UE 383 at the Public Meeting on December 15, 2020. Advice 21-021 was approved at the Public Meeting on December 14, 2021.

Attachment A provides a comparison of the Schedule 204 revenues for 2022 under present rates to the amount to be amortized in 2023.

As PacifiCorp has previously stated, the earnings test set forth in ORS 757.259(5) is not applicable to the requested deferral amortization because PacifiCorp applied for deferral under ORS 757.365(1) or, in the alternative, ORS 469A.120,³ neither of which subject deferral amortization to the three percent cap set forth in ORS 757.259(6). However, the requested deferral amortization is less than three percent of the company's earnings, as required by ORS 757.259(6). Thus, while PacifiCorp takes the position that the costs associated with this mandatory program are not subject to the three percent cap on amortization of deferred costs under ORS 757.259(6), the deferral amortization is, in fact, less than three percent of the company's earnings.

It is respectfully requested that all data 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

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

Sincerely,



Shelley McCoy
Director, Regulation

Enclosure

³ PacifiCorp also applied under the general deferral statute, ORS 757.259 in the event the Commission found that neither ORS 757.365 nor ORS 469A.120 provided grounds for deferral.

ATTACHMENT A

PacifiCorp
Oregon Solar Initiative Program (OSIP)
September 2022 Program Year 187392
Interest Calculation

Interest rate during deferral period thru Dec-22	7.14%	UE 374 WACC
Interest rate during amortization period	1.82%	MBTR

	Beginning Balance	Additions	Amortization	Interest	Ending Balance
Program Year 2022 Deferrals					
October-21	-	304,617		906	305,523
November-21	305,523	210,120		2,442	518,085
December-21	518,085	171,843		3,592	693,520
January-22	693,520	185,280		4,676	883,475
February-22	883,475	174,848		5,775	1,064,097
March-22	1,064,097	312,135		7,257	1,383,489
April-22	1,383,489	277,286		9,053	1,669,828
May-22	1,669,828	397,544		11,114	2,078,485
June-22	2,078,485	492,882		13,828	2,585,196
July-22	2,585,196	318,218		16,322	2,919,736
August-22	2,919,736	475,189		18,779	3,413,703
September-22	3,413,703	191,254		20,872	3,625,830
Total Program Year 2022⁽¹⁾		3,511,214		114,616	
Calculation of Amount to Amortize					
October-22	3,625,830			21,565	3,647,395
November-22	3,647,395			21,693	3,669,089
December-22	3,669,089			21,823	3,690,911
January-23	3,690,911	(59,427)	(305,388)	5,321	3,331,418
March-23	3,331,418		(305,388)	4,821	3,030,852
April-23	3,030,852		(305,388)	4,365	2,729,829
May-23	2,729,829		(305,388)	3,909	2,428,350
June-23	2,428,350		(305,388)	3,451	2,126,414
July-23	2,126,414		(305,388)	2,993	1,824,020
August-23	1,824,020		(305,388)	2,535	1,521,167
September-23	1,521,167		(305,388)	2,076	1,217,855
October-23	1,217,855		(305,388)	1,615	914,083
November-23	914,083		(305,388)	1,155	609,851
December-23	609,851		(305,388)	693	305,156
January-24	305,156		(305,388)	231	(0)
Total Deferral Amount and Interest		3,451,787		212,863	
		Total Deferred Amount With Interest		3,664,651	

(1) Total costs for the program year ended September 2022 excluding interest.