PACIFIC POWER.
A DIVISION OF PACIFICORP

825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232

May 15, 2023

VIA ELECTRONIC FILING

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

Re: Advice No. 23-012/UE 421—PacifiCorp's 2022 Power Cost Adjustment Mechanism

In compliance with ORS 757.205, OAR 860-022-0025, and OAR 860-022-0030, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits for filing the following proposed tariff pages associated with Tariff P.U.C. OR No. 36, which sets forth all rates, tolls, charges, rules, and regulations applicable to electric service in Oregon. PacifiCorp requests an effective date of January 1, 2024.

A. Description of Filing

In Order No. 12-493, the Public Utility Commission of Oregon (Commission) approved a Power Cost Adjustment Mechanism (PCAM) to allow PacifiCorp to recover the difference between actual net power costs (NPC) incurred to serve customers and the base NPC established in PacifiCorp's annual transition adjustment mechanism (TAM) filing. The amount recovered from or refunded to customers for a given year is subject to the following parameters:

- Asymmetrical Deadband. Any variance between negative $15 million and positive $30 million will be absorbed by the Company.
- Sharing Band. Any variance above or below the deadband will be shared 90 percent by customers and 10 percent by the Company.
- Earnings Test. If PacifiCorp's earned return on equity (ROE) is within plus or minus 100 basis points of the allowed ROE, there will be no recovery from or refund to customers.
- Amortization Cap. The amortization of deferred amounts are capped at six percent of the revenue for the preceding calendar year.

On an Oregon-allocated basis, actual 2022 PCAM costs were approximately $163.3 million more than base PCAM costs established in the 2022 TAM (docket UE 390). The application of the deadband, sharing band, and earnings test results in a recovery of $131.1 million through the 2022 PCAM. Therefore, PacifiCorp is requesting a rate change. PacifiCorp is proposing to amortize this amount over two years.

In compliance with Order No. 17-524, PacifiCorp includes supporting direct testimony and exhibits from the following witnesses:

- **Jack Painter, Net Power Cost Specialist:** Provides discussion of how the PCAM balance was calculated for the Deferral Period; the main differences between adjusted actual net power costs and net power costs in rates; and PacifiCorp's participation in the energy imbalance market (EIM) with the California Independent System Operator and the benefits from EIM that are passed through to customers.

- **Judith M. Ridenour, Specialist Pricing and Cost of Service:** Provides discussion of proposed rate spread, rates, and revised tariff pages for the 2022 PCAM; and summary of the impact of the proposed rate change on customers' bills.

A differential worksheet indicating actual minus base power costs for each separate cost category in the PCAM on a gross cost and per megawatt-hour unit basis is included in the confidential workpapers accompanying this filing.

Confidential material supporting this filing is provided subject to the general protective order in this proceeding, Order No. 23-132. The information contained in the workpapers contains market sensitive pricing information that could harm PacifiCorp and its customers if released publicly.

B. Tariff Sheets

The following proposed tariff sheets are provided in Ms. Ridenour Exhibit PAC/202.

Sheet	Schedule	Title
Third Revision of Sheet No. 206-1	Schedule 206	Power Cost Adjustment Mechanism – Adjustment
Original Sheet No. 206-2	Schedule 206	Power Cost Adjustment Mechanism – Adjustment

C. Requirements of OAR 860-022-0025 and OAR 860-022-0030

To support the proposed rates and meet the requirements of OAR 860-022-0025 and OAR 860-022-0030, PacifiCorp provides the description and support indicated in Section A above. Please refer to the exhibits of Ms. Ridenour for the calculation of the proposed rate changes and impacts of proposed price changes by rate schedule.

This proposed change will affect approximately 652,000 customers and would result in an overall annual rate increase of approximately $69.0 million, or 4.0 percent. Residential customers using 900 kilowatt-hours per month would see an average monthly bill increase of $4.03 per month as a result of this change.

D. Correspondence

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

Ajay Kumar
Assistant General Counsel
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
ajay.kumar@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 Street, Suite 2000
Portland, OR 97232

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

Sincerely,

Matthew McVee
Vice President, Regulatory Policy and Operations

Cc: Service List UE 420
Service List UE 404

CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of **Advice No. 23-012/UE 421—PacifiCorp's 2022 Power Cost Adjustment Mechanism** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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UE 420

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Dated this 15th day of May, 2023.

Carrie Meyer
Adviser, Regulatory Operations

CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of **Advice No. 23-012/UE 421—PacifiCorp's 2022 Power Cost Adjustment Mechanism** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

Service List
UE 404

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Dated this 15th day of May, 2023.

Carrie Meyer

Carrie Meyer
Adviser, Regulatory Operations

Docket No. UE 421
Exhibit PAC/100
Witness: Jack Painter

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

PACIFICORP

Direct Testimony of Jack Painter

May 2023

TABLE OF CONTENTS

ATTACHED EXHIBITS

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name, business address, and present position with PacifiCorp, d/b/a Pacific Power (PacifiCorp or Company).

A. My name is Jack Painter and my business address is 825 NE Multnomah Street, Suite 600, Portland, Oregon 97232. My title is Net Power Cost Specialist.

Q. Briefly describe your education and professional experience.

A. I received a Bachelor of Arts degree in Business Administration with a Finance major from Washington State University in 2007. I have been employed by PacifiCorp since 2008 and have held positions in the regulation and jurisdictional loads departments. I joined the regulatory net power costs group in 2019 and assumed my current role as a Net Power Cost Specialist in 2020.

Q. Have you testified in previous regulatory proceedings?

A. Yes. I have previously provided testimony to the public utility commissions in Oregon, Washington, California, Utah, Wyoming, and Idaho.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony in this proceeding?

A. My testimony presents and supports PacifiCorp's calculation of the Power Cost Adjustment Mechanism (PCAM) costs for the 12-month period of January 1 through December 31, 2022 (Deferral Period). More specifically, I provide the following:

- Background on the PCAM and an accounting of how the PCAM balance was calculated for the Deferral Period;
- Discussion of the main differences between adjusted actual net power costs (Actual NPC) and net power costs in rates (Base NPC); and,

- Discussion about PacifiCorp's participation in the Western Energy Imbalance Market (WEIM) with the California Independent System Operator (CAISO) and the benefits from WEIM that are passed through to customers.

Q. Are additional witnesses presenting testimony specifically for the PCAM and Rate Schedule 206 in this case?

A. Yes. Company Witness Judith Ridenour, Pricing and Cost of Service Specialist, provides testimony on the proposed Schedule 206 rates.

III. SUMMARY OF THE PCAM DEFERRAL CALCULATION

Q. Please briefly describe PacifiCorp's PCAM authorized by the Public Utility Commission of Oregon (Commission).

A. Commission Order No. 12-493 approved a PCAM to allow PacifiCorp to recover the difference between actual PCAM costs incurred to serve customers and the base PCAM costs established in PacifiCorp's annual transition adjustment mechanism (TAM) filing.[1] PCAM costs include NPC and Production Tax Credits (PTC).

Q. Please summarize the calculation of the PCAM deferral included in this filing.

A. For the Deferral Period, on an Oregon-allocated basis, actual PCAM costs are $163.3 million more than base PCAM costs established in docket UE 390 (2022 TAM). The application of the deadband, sharing band, and earnings test results in a recovery of $131.1 million through the 2022 PCAM.

[1] *In the Matter of PacifiCorp, dba Pacific Power, Request for a General Rate Case*, Docket No. UE 246, Order No. 12-493 (Dec. 20, 2012).

Q. Have you provided detailed support for the calculation of the PCAM balance with your testimony?

A. Yes. Exhibit PAC/101 is a summary of the calculation of PacifiCorp's 2022 PCAM deferral on a monthly basis. Detailed workpapers supporting Exhibit PAC/101 are provided separately.[2]

IV. PCAM DEFERRAL CALCULATION

Q. Please describe the calculation of the PCAM deferral included in this filing.

A. The PCAM deferral is calculated on a monthly basis by comparing actual PCAM costs to base PCAM rates on a per-unit basis. The amount recovered from or refunded to customers for a given year is subject to the following parameters:

- Asymmetrical Deadband: Any PCAM difference between negative $15 million and positive $30 million will be absorbed by the Company.
- Sharing Band: Any PCAM difference above or below the deadband will be shared 90 percent by customers and 10 percent by PacifiCorp.
- Earnings Test: If PacifiCorp's earned return on equity (ROE) is within plus or minus 100 basis points of the authorized ROE, there will be no recovery from or refund to customers.
- Amortization Cap: The amortization of deferred amounts is capped at six percent of the revenue for the preceding calendar year.

For the Deferral Period the earned ROE was 3.07 percent which was more than 100 basis points lower than the 9.5 percent authorized ROE. Because the deferral balance exceeded the deadband, and after applying the sharing band, PacifiCorp is

[2] Confidential workpapers are provided pursuant to the protective order in this proceeding.

allowed to request a rate change to Schedule 206. A summary of the deferral calculation is shown in Table 1.

Table 1
Summary of PCAM Account Balance

Calendar Year 2022 PCAM Deferral	
Actual PCAM Costs ($/MWh)	$ 31.47
Base PCAM Costs ($/MWh)	19.48
PCAM Cost Differential ($/MWh)	12.00
Oregon Retail Load (MWh)	13,700,592
PCAM Differential*	$ 163,260,141
Situs Resource True-Up*	70,774
Total PCAM Differential*	163,330,914
Total Deferrable ABOVE Deadband	133,330,914
Total Deferrable BELOW Deadband	-
Oregon Deferral at 90% Sharing	119,997,823
Interest Accrued through December 31, 2022	2,122,429
Oregon Deferral at 90% Sharing after Earning Test	122,120,252
Interest Accrued January 1, 2023 through December 31, 2023	8,970,059
Requested PCAM Recovery	**$ 131,090,311**

* *Calculated monthly*

Q. How is PacifiCorp proposing to amortize the balance?

A. PacifiCorp is proposing to amortize the balance over two years, beginning January 1, 2024, consistent with the amortization cap as identified above. This results in an annual rate increase of $69.0 million including interest during amortization.

Q. How is the monthly PCAM differential calculated?

A. As previously noted, on a monthly basis, actual PCAM costs are compared to base

PCAM costs on a per-unit basis. PCAM costs are established in the Oregon TAM and include NPC and PTCs. WEIM benefits are embedded in NPC. Any differences in the system per-unit cost are multiplied by the actual megawatt-hours (MWh) of Oregon retail sales in that month to determine Oregon's share of any differential. The calculation uses the following formula:

$$(PCAMC_a \div Load_a) - (PCAMC_b \div Load_b) = \text{System PCAM Unit Cost Differential}$$

$$\text{System PCAM Unit Cost Differential} \times Load_o + (SR_a - SR_b) = \text{PCAM Differential}$$

Where:

$PCAMC_a$	= Total-company Adjusted Actual NPC (Excluding Situs Resources) plus other costs/benefits reflected in Oregon TAM
$Load_a$	= Actual System Retail Load
$PCAMC_b$	= Total-company Base NPC (Excluding Situs Resources) adjusted for Direct Access plus other costs/benefits reflected in Oregon TAM
$Load_b$	= Base System Retail Load
$Load_o$	= Actual Oregon Retail Load
SR_a	= Actual Situs Resource Value
SR_b	= Forecast Situs Resource Value

The cumulative PCAM differential (under- or over-recovery) is first compared against the asymmetrical deadband. Cumulative PCAM differential amounts in excess of the asymmetrical deadband are then subject to the sharing band (90 percent customers, 10 percent Company). Monthly balances accrue interest at PacifiCorp's authorized rate of return in Oregon for 2022. The final step is to apply, if necessary, the earnings test to determine if any amount is eligible for recovery from or refund to customers. To the extent earnings are within plus or minus 100 basis points of the authorized ROE, no recovery or refund is allowed under the approved PCAM design.

Q. What were total-Company adjusted Actual NPC for the Deferral Period and how were they determined?

A. The total-company adjusted Actual NPC in the Deferral Period were approximately $2.037 billion. This amount captures all components of NPC as modeled by PacifiCorp's Generation and Regulation Initiative Decision Tool (GRID) model in the Company's annual TAM filings. Specifically, it includes amounts booked to the following Federal Energy Regulatory Commission (FERC) accounts:

Account 447 – Sales for resale, excluding on-system wholesale sales and other revenues that are not modeled in GRID

Account 501 – Fuel, steam generation; excluding fuel handling, start-up fuel (gas and diesel fuel, residual disposal) and other costs that are not modeled in GRID

Account 503 – Steam from other sources

Account 547 – Fuel, other generation

Account 555 – Purchased power, excluding the Bonneville Power Administration residential exchange credit pass-through if applicable

Account 565 – Transmission of electricity by others.

Q. Is the Company aware of any potential upcoming changes to the FERC accounting that would affect costs included in the PCAM?

A. Yes. On July 28, 2022, the FERC issued a Notice of Proposed Rulemaking (Docket No. RM21-11-000) to change the accounting required for certain types of costs that have been previously booked to FERC Account 555 to be booked to FERC account 509.[3]

Q. Once the FERC's decision is final, what costs would be affected?

A. The change in accounting would affect the costs associated with greenhouse gas and environmental allowances that have been booked to FERC account 555 and historically included in the PCAM.

Q. Why is the Company mentioning the potential FERC accounting change at this time?

A. The Company anticipates the FERC will approve the accounting change and wanted to raise the matter to inform the Commission and the parties of the upcoming change. PacifiCorp anticipates updating the TAM Guidelines and the PCAM deferral authorization to include this FERC account in anticipation of this change.

Q. What adjustments are made to Actual NPC and why are they needed?

A. PacifiCorp adjusts Actual NPC to reflect the ratemaking treatment of several items, including:

- out of period accounting entries booked in the Deferral Period that relate to operations before implementation of the PCAM on January 1, 2013;
- buy-through of economic curtailment by interruptible industrial customers;
- revenue from a contract related to the Leaning Juniper wind resource;
- costs for situs-assigned resources/programs in Oregon and Utah;
- avian curtailment at specific wind farms;

[3] *Notice of Proposed Rulemaking*, 180 FERC ¶ 61,050, Docket No. RM21-11-000 (Jul. 28, 2022) *available at* https://www.ferc.gov/media/e-3-rm21-11-000.

- the exclusion of Rolling Hills wind farm from Oregon rates (consistent with docket UE 200);
- coal inventory adjustments to reflect coal costs in the correct period;
- reductions to coal costs for management overtime, 50 percent of management incentive compensation, and legal fees related to fines and citations;
- adjustments related to liquidated damages that occurred outside the Deferral Period (all liquidated damage fees are booked in accordance with generally accepted accounting principles); and
- situs assignment of Reasonable Energy Price adjustments to qualifying facilities as described in the 2020 Inter-Jurisdictional Allocation Protocol (2020 Protocol).

Q. Please summarize the Direct Access (DA) load included in the PCAM.

A. Each year Base NPC is set in the TAM. After Base NPC is determined certain customers have the option to move to DA and purchase energy from an Electricity Service Provider. In the PCAM, Base NPC is adjusted for the lost DA load.

Q. Please summarize the PTCs included in the PCAM.

A. PTCs forecast in the TAM are also included in the PCAM. In the 2022 TAM, PTC benefits were calculated using PacifiCorp's combined federal and state income tax rate that was effective in 2018. On a total-company basis, actual PTCs were $20.3 million lower than PTCs in the 2022 TAM due to generation variances.

Q. Please describe the true-up of certain Oregon-situs resources included in the PCAM.

A. The PCAM includes a true-up of the value of energy from solar facilities procured to satisfy the solar capacity standard in ORS 757.370. Consistent with the Commission-approved 2020 Protocol, these resources are situs-assigned to Oregon. Base NPC established in the TAM includes a situs credit for the market value of the solar energy. In the PCAM, the actual market value of the solar energy is compared to the prior forecast, and the difference is included in the balancing account.

Additionally, the PCAM includes a true-up for the situs assignment of certain reasonable energy price qualifying facilities. The actual reasonable energy price costs are compared to the forecast in the TAM and any difference is included in the balancing account.

Q. Are costs related to Western Power Pool's (WPP) Western Resource Adequacy Program (WRAP) and the CAISO WEIM Body of State Regulators (BOSR) included in the PCAM?

A. Yes. Costs have been included related to the participation in the WRAP and the WEIM BOSR. Both costs were included in the 2023 General Rate Case in docket UE 399 for rates effective on January 1, 2023.[4] Because this PCAM filing covers the 2022 deferral period, calendar year 2022 costs have been included in this filing, but will not be included in the 2023 PCAM filing next year. Oregon allocated costs are $14,113 for participation in the WEIM BOSR and $115,341 for participation in the WPP WRAP.

Q. What are situs-assigned resources?

A. Situs-assigned resources are renewable resources that the Company acquired on behalf of either individual states or customers in order to serve part or all of their

[4] *In the Matter of the Application of PacifiCorp d/b/a Pacific Power for a General Rate Revision*, Docket No. UE 399, PAC/400, Wilding/26-28 (Mar. 1, 2022).

energy needs by a renewable resource. Both the costs and benefits for these resources are situs-assigned to the state of origin. Non-participating states should not bear higher costs for these resources.

Q. Which resources or programs are considered situs-assigned?

A. There are currently eight resources or programs that are situs-assigned with four in Utah and four in Oregon. The Utah situs-assigned resources or programs are Pavant III Solar for the Utah Subscriber Solar Program, the Utah Transition Program for customer generators, Amor IX/Soda Lake Geothermal under Utah Electric Service Schedule No. 32 (Schedule 32), and Cove Mountain Solar 2 and Graphite Solar under Utah Electric Service Schedule No. 34 (Schedule 34). The Oregon situs-assigned resources or programs are Black Cap Solar, Old Mill Solar, Oregon Community Solar, and the Oregon Solar Incentive Plan.

Q. How has the Company treated situs-assigned resources in the past?

A. The Company has used the mark-to-market calculation to determine the energy impact on NPC. Generally, the mark-to-market calculation resulted in a reduction to NPC for non-participating states with the difference between the market value and actual cost situs-assigned to the state of origin.

Q. Did the Company change the treatment for situs-assigned resources? Please explain.

A. The mark-to-market calculation has traditionally worked well in the past because situs-assigned resources have typically cost more compared to market prices. With significantly rising market prices, the mark-to-market calculation does not protect non-participating states in the same manner and only using the mark-to-market calculation could shift higher costs to non-participating states when market prices are higher than actual costs.

Q. What changes has the Company made in this PCAM filing for situs-assigned resources?

A. The Company uses either the actual cost or the mark-to-market calculation, whichever is lower for NPC allocation purposes. This treatment will ensure that non-participating states will not pay costs higher than actual costs and only the costs that are above market will be situs-assigned to state of origin.

Q. Are there any exceptions to the changes the Company has made?

A. Yes. Black Cap Solar in Oregon is a Company leased resource that has continued the sole use of the mark-to-market calculation because there is no associated Power Purchase Agreement (PPA) cost for this resource in NPC. Additionally, because the Utah Subscriber Solar Program and both Utah Schedule 32 and Schedule 34 resources are paid entirely by the respective customers, the lower of actual cost or market results in zero PPA costs. While the PPA costs for the Utah Subscriber Solar Program and Utah Schedule 32 and Schedule 34 are zero, there are specific program or contractual costs for excess generation situs-assigned to Utah.

Q. Is PacifiCorp requesting a rate change with this filing?

A. Yes. As described earlier, the earned ROE was more than 100 basis points lower than the authorized ROE and after applying the $30 million asymmetrical positive deadband, the 90 percent customer and 10 percent Company sharing band and interest, the requested PCAM recovery is $131.1 million, therefore, the 2022 PCAM qualifies for recovery. As noted above, PacifiCorp is requesting amortization of this deferral amount over two years beginning January 1, 2024.

V. SUMMARY OF THE NPC DIFFERENCES

Q. Please describe the Base NPC PacifiCorp used to calculate the NPC component of the PCAM deferral.

A. The Base NPC for the 2022 PCAM was set in Order No. 21-379 in docket UE 390. Base rates became effective January 1, 2022.

Q. Please describe Table 2 and the line items making up the difference between Actual NPC and Base NPC.

A. Table 2 displays the Base NPC approved by the Commission for the Deferral Period. The remainder of Table 2 is a breakout of the difference between Actual NPC and Base NPC, by cost category, on a total-company basis. The differences by category in Table 2 result from comparing Actual NPC to the Base NPC effective during the Deferral Period.

Table 2
Net Power Cost Reconciliation ($millions)

Base NPC	$	1,369
Increase/(Decrease) to NPC:		
Wholesale Sales Revenue		322
Purchased Power Expense		65
Coal Fuel Expense		(66)
Natural Gas Expense		307
Wheeling, Hydro and Other Expense		39
Total Increase/(Decrease)		667
Adjusted Actual NPC	$	2,037

Q. Please describe some of the weather events that impacted NPC during the Deferral Period.

A. Similar to 2021, calendar year 2022 was also marked by several extreme and unforeseeable weather events that has a collective impact on Actual NPC during the year. Multiple heat waves across the Company's service territories throughout July, August, and September had a significant effect on market prices, ultimately leading to an increase in NPC. Cumulatively, the NPC differential for those months amounted to $73.7 million, which is almost half of the entire $163.3 million variance on an Oregon-allocated basis.

Additionally, ongoing drought in the West, which began in the summer of 2020, continued to impact Actual NPC because it reduced the availability of the Company's hydro resources. In 2022, actual generation from hydro resources were 428,819 MWhs, or 13 percent, lower than forecast generation and needed to be replaced to meet customer demand either through system dispatch of other resources, reduced market sales, increased market purchases, or any combination of these options. The estimated impact on total-company NPC in 2022 due to decreased hydro MWhs from drought is $62 million.

Finally, in December 2022 a historic winter cyclone event occurred across the majority of the U.S., which impacted both market prices and natural gas prices, along with an increase in demand. Natural gas prices across the Company's delivery points drastically increased. At the Opal natural gas trading hub, average prices were 424 percent higher in December 2022 as compared to December 2021, while market prices at the Mid-Columbia and Four-Corners trading hubs were, on average, 406 percent higher across all load hours. The NPC differential in December alone is $35.7 million, or 22 percent, of the total Oregon-allocated NPC variance.

Q. How has the conflict in Ukraine impacted regional natural gas fuel prices?

A. The ongoing conflict in Ukraine has resulted in decreased availability of natural gas in Europe, which was previously sourced from Russian imports. With decreased European supply, the associated European demand has turned to U.S. domestic supply to fill the gap. This has resulted in increased competition over domestic supply, which has driven regional natural gas fuel prices upwards due to domestic production being unable to keep pace with the increased demand. This increase in natural gas fuel prices correspondingly increases regional natural gas market prices and regional power market prices, in that order. It is difficult to predict (or forecast) how long, and in what direction, these factors will continue to impact regional prices.

Q. Please describe the differences between Actual NPC and Base NPC.

A. Actual NPC were $667 million higher than Base NPC due to a $322 million decrease in wholesale sales revenues (which increases NPC), a $65 million increase in purchased power expense, a $307 million increase in natural gas expense, and a $39 million increase in wheeling and other expenses. The reduction in wholesale sales revenue and increased expenses were partially offset by a $66 million reduction in coal fuel expense.

Q. Please explain the changes in wholesale sales revenue.

A. Wholesale sales revenues were lower relative to Base NPC due to a reduction in wholesale sales volume of market transactions (represented in PacifiCorp's production model (GRID) as short-term firm and system balancing sales). Revenue from market transactions was approximately $352 million lower than Base. Actual wholesale market volumes were 4,756 gigawatt-hours (GWh), or 56 percent, lower than Base NPC.

Variances between Actual and Base NPC for wholesale sales are partially attributable to the TAM forecast modeling of market depth.[5] The 2022 TAM over-forecast wholesale sales with a 75th percentile market depth methodology based on historical monthly sales across four-years. Instead, the 2023 TAM incorporated revisions to the forecast methodology to use a relatively more realistic 50th percentile (simple average) of historical monthly sales across four years. This approach will help improve the forecast of wholesale sales, ultimately reducing the variance between Base and Actual NPC.

Q. Please explain the changes in purchased power expense.

A. Purchased power expense increased primarily due to higher market purchases of $450 million (represented in GRID as short-term firm and system balancing purchases) with the most significant impact tied to several heat waves throughout July, August, and September, further compounded by ongoing drought dating back to the summer of 2020. The volume of actual market purchases was 1,325 GWh (24 percent) higher than Base NPC and more significantly, the average price of actual market purchase transactions was $56.68/MWh, or 129 percent, higher than Base NPC.

During the summer 2022 heat waves, the Mid-Columbia market hub saw an average increase in heavy load hour market prices of 103 percent, or just over double,

[5] The TAM refers to market depth as market capacity limits.

in August and September as compared to the same timeframe in 2021. This is significant considering 2021 also experienced an extreme heat dome and drought. The Four Corners market hub saw an average increase in heavy load hour market prices of 151 percent for the same period.

Q. Please explain the changes in coal fuel expense.

A. Overall coal fuel expense decreased because coal generation volume decreased by 3,122 GWh compared to Base NPC and the average cost of coal generation decreased from $20.53/MWh in Base NPC to $20.46/MWh in the Deferral Period. Toward the end of 2022, due to conditions outside of the Company's control, coal supply issues causing delivery shortages began to impact the dispatch at Utah's Hunter and Huntington coal-generating plants. The operating mines in Utah's Book Cliffs and Wasatch Plateau coal fields experienced production difficulties due to a variety of geological, logistical, and financial challenges. Additionally, there was a mine fire at American Consolidated Natural Resources' Lila Canyon mine in September 2022. In recent years, the Lila Canyon mine has accounted for more than 25 percent of Utah's coal production.

Q. Please explain the changes in natural gas fuel expense.

A. The total natural gas fuel expense in Actual NPC increased by $307 million compared to Base NPC mainly due to an increase in natural gas generation volume of 4,072 GWh, or 42 percent higher than Base NPC during the Deferral Period. The average cost of natural gas generation also increased from $31.55/MWh in Base NPC to $44.61/MWh in the deferral period caused by conflict in Ukraine and a historic winter weather event as discussed above. Lastly, as noted previously, while the

Company was experiencing coal supply shortages toward the end of 2022, system obligations still had to be met. Each day, when modeling the load resource balance, an optimization model reviews resources and obligations and makes economic decisions as to how best to serve those obligations through an increase in available Company-owned generation or market purchases. Even with higher natural gas prices in 2022, Company owned gas-generating plants were still least-cost dispatch resources, on average, more economic than market purchases.

VI. IMPACT OF PARTICIPATING IN THE WEIM

Q. What is the CAISO WEIM?

A. The CAISO WEIM is an advanced real-time energy market that automatically finds low-cost energy to serve real-time consumer demand across the west by allowing participants to buy and sell power close to the time electricity is consumed. Since its launch in 2014, the WEIM has enhanced grid reliability, improved the integration of renewable resources, lowered carbon emissions, and generated significant cost savings for its participants.

Q. Are the actual benefits from participating in the WEIM included in the PCAM deferral?

A. Yes. Participation in the WEIM provides significant benefits to customers in the form of reduced Actual NPC. The benefits are embedded in Actual NPC through lower fuel costs, lower purchased power costs, and higher wholesale sales revenue.

Q. What are the actual WEIM benefits included in the PCAM deferral?

A. CAISO's WEIM benefits report indicates that PacifiCorp has received $200 million in benefits in 2022. Since inception of the WEIM, PacifiCorp has received

$591.4 million in total benefits.

VII. CONCLUSION

Q. Please summarize your testimony.

A. The PCAM deferral of $131.1 million, including interest for the calendar year 2022 Deferral Period was accurately calculated in compliance with the PCAM tariff and previous Commission orders. The increase is driven by extreme weather events, increased market purchases, and both higher market prices and natural gas fuel prices. These increased costs were offset by lower coal fuel expenses.

Q. Does this conclude your direct testimony?

A. Yes.

Docket No. UE 421
Exhibit PAC/101
Witness: Jack Painter

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

PACIFICORP

Exhibit Accompanying Direct Testimony of Jack Painter

2022 PCAM Calculation

May 2023

Oregon Power Cost Adjustment Mechanism
January 1, 2022 - December 31, 2022
Exhibit/PAC 101 - Power Cost Adjustment Mechanism Calculation

Line No.		Reference	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total
Actual:															
1	Total Company Adjusted Actual NPC	(2.1)	$ 149,438,464	$ 128,122,294	$ 123,141,371	$ 133,479,278	$ 140,346,917	$ 134,730,073	$ 228,079,752	$ 217,306,300	$ 195,680,692	$ 139,806,687	$ 172,215,427	$ 274,432,726	$ 2,036,779,981
2	Actual Allocated PTC	(4.1)	(27,504,870)	(26,859,264)	(23,542,967)	(24,354,227)	(20,422,649)	(14,907,112)	(11,756,331)	(10,704,298)	(12,291,227)	(15,704,030)	(20,915,161)	(28,974,567)	(237,936,704)
3	Total PCAM Adjusted Actual Costs	Sum Lines 1 - 2	121,933,593	101,263,031	99,598,404	109,125,051	119,924,268	119,822,961	216,323,421	206,602,003	183,389,465	124,102,657	151,300,266	245,458,159	1,798,843,278
4	Actual System Retail Load	(8.1)	4,987,311	4,377,628	4,467,823	4,286,592	4,346,993	4,701,404	5,780,966	5,361,966	4,568,728	4,281,868	4,797,471	5,197,163	57,155,915
5	Actual PCAM Costs $/MWH	Line 3 / Line 4	$ 24.45	$ 23.13	$ 22.29	$ 25.46	$ 27.59	$ 25.49	$ 37.42	$ 38.53	$ 40.14	$ 28.98	$ 31.54	$ 47.23	$ 31.47
Base:															
6	Total Company Base NPC	(3.1)	$ 95,580,153	$ 104,984,114	$ 123,863,422	$ 118,182,046	$ 124,049,304	$ 120,189,616	$ 120,426,863	$ 116,582,211	$ 94,804,267	$ 109,250,127	$ 112,660,872	$ 128,831,722	$ 1,369,404,716
7	Adjustment for Direct Access	(3.2)	(1,548,415)	(1,285,240)	(1,243,102)	(830,827)	(658,610)	(822,488)	(1,954,738)	(2,125,770)	(1,379,219)	(1,364,345)	(999,381)	(1,889,631)	(16,101,766)
8	Base Allocated PTC	(4.1)	(21,523,743)	(21,523,743)	(21,523,743)	(21,523,743)	(21,523,743)	(21,523,743)	(21,523,743)	(21,523,743)	(21,523,743)	(21,523,743)	(21,523,743)	(21,523,743)	(258,284,914)
9	Total PCAM Base Costs	Sum Lines 6 - 8	72,507,995	82,175,131	101,096,577	95,827,476	101,866,950	97,843,385	96,948,382	92,932,699	71,901,305	86,362,039	90,137,748	105,418,348	1,095,018,036
10	Base System Retail Load	(8.1)	4,941,352	4,318,730	4,506,471	4,239,564	4,436,755	4,697,067	5,412,670	5,187,257	4,518,988	4,414,433	4,527,144	5,019,942	56,220,374
11	Base PCAM Costs $/MWh	Line 9 / Line 10	$ 14.67	$ 19.03	$ 22.43	$ 22.60	$ 22.96	$ 20.83	$ 17.91	$ 17.92	$ 15.91	$ 19.56	$ 19.91	$ 21.00	$ 19.48
12	System PCAM Unit Cost Differential $/MWh	Line 5 - Line 11	$ 9.78	$ 4.10	$ (0.14)	$ 2.85	$ 4.63	$ 4.66	$ 19.51	$ 20.62	$ 24.23	$ 9.42	$ 11.63	$ 26.23	$ 12.00 #
13	Oregon Retail Load	(8.1)	1,282,379	1,122,552	1,070,988	1,096,950	1,020,039	992,367	1,224,471	1,227,367	1,013,527	1,028,069	1,260,412	1,361,470	13,700,592
Deferral:															
14	Monthly PCAM Differential - Above or (Below) Base	Line 12 * Line 13	$ 12,535,316	$ 4,607,319	$ (151,294)	$ 3,130,864	$ 4,720,818	$ 4,620,354	$ 23,887,663	$ 25,302,724	$ 24,556,975	$ 9,684,131	$ 14,654,805	$ 35,710,467	$ 163,260,141
15	Oregon Situs Resource True-Up	(7.1)	22,044	20,068	3,073	(6,633)	(91,129)	(22,010)	56,079	118,104	25,083	(16,995)	(16,509)	(20,400)	70,774
16	Total Monthly PCAM Differential - Above or (Below) Base	Line 14 + Line 15	12,557,360	4,627,387	(148,221)	3,124,231	4,629,688	4,598,344	23,943,742	25,420,827	24,582,058	9,667,135	14,638,296	35,690,067	163,330,914
17	Cumulative PCAM Differential - Above or (Below) base		12,557,360	17,184,747	17,036,525	20,160,756	24,790,445	29,388,789	53,332,531	78,753,358	103,335,416	113,002,552	127,640,848	163,330,914	
18	Positive Deadband - ABOVE Base	Order. 12-493	30,000,000	30,000,000	30,000,000	30,000,000	30,000,000	30,000,000	30,000,000	30,000,000	30,000,000	30,000,000	30,000,000	30,000,000	30,000,000
19	Negative Deadband - BELOW Base	Order. 12-493	(15,000,000)	(15,000,000)	(15,000,000)	(15,000,000)	(15,000,000)	(15,000,000)	(15,000,000)	(15,000,000)	(15,000,000)	(15,000,000)	(15,000,000)	(15,000,000)	(15,000,000)
20	Amount Deferrable - ABOVE Deadband		-	-	-	-	-	-	23,332,531	25,420,827	24,582,058	9,667,135	14,638,296	35,690,067	133,330,914
21	Amount Deferrable - BELOW Deadband		-	-	-	-	-	-	-	-	-	-	-	-	-
22	Total Incremental Deferrable	Line 20 + Line 21	-	-	-	-	-	-	23,332,531	25,420,827	24,582,058	9,667,135	14,638,296	35,690,067	133,330,914
23	Total Incremental Deferral After 90%/10% Sharing Band	Line 22 * 90%	$ -	$ -	$ -	$ -	$ -	$ -	$ 20,999,278	$ 22,878,745	$ 22,123,853	$ 8,700,422	$ 13,174,467	$ 32,121,060	$ 119,997,823
Energy Balancing Account:															
24	Monthly Interest Rate	Note 1	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	
25	Beginning Balance	Prior Month Line 28	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 21,061,724	$ 44,133,769	$ 66,585,898	$ 75,708,212	$ 89,372,131	$ -
26	Incremental Deferral	Line 23	-	-	-	-	-	-	20,999,278	22,878,745	22,123,853	8,700,422	13,174,467	32,121,060	119,997,823
27	Interest	Line 24 * (Line 25 + 50% x Line 26)	-	-	-	-	-	-	62,447	193,300	328,276	421,893	489,452	627,061	2,122,429
28	Ending Balance	∑ Lines 25:27	$ -	$ -	$ -	$ -	$ -	$ -	$ 21,061,724	$ 44,133,769	$ 66,585,898	$ 75,708,212	$ 89,372,131	$ 122,120,252	$ 122,120,252
Earnings Test:															
29	Earned Return on Equity	(9.1)													3.07%
30	Allowed Return on Equity	UE 374													9.50%
31	100bp ROE Revenue Requirement														$ 30,645,855
32	Allowed Deferral After Earning Test														166,345,457
33	Total Deferred														$ 122,120,252
34	Interest Accrued January 1, 2023 through December 31, 2023	Line 33 * (1 + 1.07109% / 12) ^ 12 - Line 33" (Note 2)													$ 8,970,059
35	**Requested PCAM Recovery**	Line 33 + Line 34													**$ 131,090,311**

Notes:

Note 1: 7.137% annual interest rate based on Oregon approved rate of return/weighted average cost of capital in UE-374 in effect through December 31, 2022.

Note 2: 7.109% annual interest rate based on Oregon approved rate of return/weighted average cost of capital in UE-399 in effect beginning January 1, 2023.

Docket No. UE 421
Exhibit PAC/200
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

PACIFICORP

Direct Testimony of Judith M. Ridenour

May 2023

TABLE OF CONTENTS

ATTACHED EXHIBITS

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name, business address, and present position with PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company).

A. My name is Judith M. Ridenour. My business address is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232. My current position is Specialist, Pricing and Cost of Service, in the regulation department.

Q. Briefly describe your education and professional experience.

A. I have a Bachelor of Arts degree in Mathematics from Reed College. I joined the Company in the regulation department in October 2000. I assumed my present responsibilities in May 2001. In my current position, I am responsible for the preparation of rate design used in retail price filings and related analyses. Since 2001, with levels of increasing responsibility, I have analyzed and implemented rate design proposals throughout the Company's six-state service territory.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. I present PacifiCorp's proposed rate spread, rates, and revised tariff pages for the 2022 Power Cost Adjustment Mechanism (PCAM) to recover the eligible costs identified by Company witness Jack Painter. I also present the impact of the proposed rate change on customers' bills.

III. PROPOSED RATE SPREAD AND RATES

Q. How does the Company propose to collect the 2022 PCAM eligible costs identified by Mr. Painter from customers?

A. As indicated by Mr. Painter, PacifiCorp proposes to collect the 2022 PCAM eligible costs from customers over a two-year period beginning January 1, 2024. Accounting for interest during amortization, the annual increase from the proposed rate change is $69.0 million.

Q. What rate spread has the Company used to set 2022 PCAM rates?

A. The Company used a generation rate spread to set the proposed PCAM rates, where rates are delineated by delivery voltage. This best reflects the types of costs recovered through the PCAM.

Q. Did you prepare an exhibit showing the proposed PCAM rate spread, rates and revenues?

A. Yes. Exhibit PAC/201 shows the proposed 2022 PCAM rate spread, rates and revenues.

Q. Please describe the Company's tariff rate schedule that collects the PCAM.

A. PacifiCorp has in place Schedule 206, Power Cost Adjustment Mechanism – Adjustment, designed to collect PCAM costs from customers. As part of the settlement of the 2021 PCAM, docket UE 404, Schedule 206 currently contains rates which are collecting the 2021 PCAM amounts over a four-year period.

Q. Please describe Exhibit PAC/202.

A. Exhibit PAC/202 contains the proposed revised Schedule 206 tariff. As described in the applicability section of the tariff, PCAM rates do not apply to customers who took service under direct access during the accrual year for each PCAM. In order to properly apply rates to the correct customers for both the ongoing 2021 PCAM collections and the proposed 2022 PCAM collections, the Company proposes to keep these rates separate in the tariff.

IV. COMPARISON OF PRESENT AND PROPOSED CUSTOMER RATES

Q. What are the overall rate effects of the changes proposed in this filing?

A. The overall proposed effect is a rate increase of $69.0 million or 4.0 percent, on a net basis. The rate change varies by customer type. Page one of Exhibit PAC/203 shows the estimated effect of PacifiCorp's proposed prices by delivery service schedule both excluding (base) and including (net) applicable adjustment schedules. The net rates in Columns 7 and 10 exclude effects of the Low Income Bill Payment Assistance Fund (Schedule 91), the Low Income Discount Cost Recovery Adjustment (Schedule 92), the Adjustment Associated with the Pacific Northwest Electric Power Planning and Conservation Act (Schedule 98), the Public Purpose Charge (Schedule 290), and the System Benefits Charge (Schedule 291).

Q. Did you prepare an exhibit that shows the impact on customer bills as a result of the proposed PCAM rate change?

A. Yes. Exhibit PAC/203, beginning on page two, contains monthly billing comparisons for customers at different usage levels served on each of the major delivery service schedules. Each bill impact is shown in both dollars and percentages. These bill comparisons include the effects of all adjustment schedules including Schedule 91, Schedule 92, Schedule 98, Schedule 290, and Schedule 291.

Q. What is the estimated monthly impact to an average residential customer?

A. The estimated monthly impact to the average residential customer using 900 kilowatt-hours per month is a bill increase of $4.03.

Q. Does this conclude your direct testimony?

A. Yes.

Docket No. UE 421
Exhibit PAC/201
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

PACIFICORP

Exhibit Accompanying Direct Testimony of Judith M. Ridenour

Proposed 2022 PCAM Rate Spread and Rates

May 2023

PACIFIC POWER
State of Oregon
2022 Power Cost Adjutment Mechanism (PCAM) - Adjustment, Proposed Schedule 206

FORECAST 12 MONTHS ENDED DECEMBER 31, 2024

Line No.	Sch No.	Description		MWh[1]	Generation Rate Spread	Proposed 2022 PCAM Sch 206 Rates (¢/kWh)	Proposed 2022 PCAM Sch 206 Revenues ($000)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
1	4	Residential		5,829,081	37.383%	0.442	$25,765
2	23	Gen. Svc. < 31 kW	Secondary	1,162,950	7.026%	0.416	$4,838
3			Primary	3,400	0.019%	0.377	$13
4	28	Gen. Svc. 31 - 200 kW	Secondary	2,059,282	12.285%	0.411	$8,464
5			Primary	24,745	0.144%	0.401	$99
6	30	Gen. Svc. 201 - 999 kW	Secondary	1,223,348	7.157%	0.403	$4,930
7			Primary	101,733	0.593%	0.401	$408
8	41	Agricultural Pumping Service	Secondary	237,610	1.370%	0.397	$943
9			Primary	34	0.000%	0.391	$0
10	48	Large General Service >= 1,000 kW	Secondary	1,216,204	7.059%	0.400	$4,865
11			Primary	2,473,740	13.846%	0.385	$9,524
12			Transmission	2,433,482	13.033%	0.369	$8,980
13	47	Partial Req. Svc. >= 1,000 kW	Primary	17,121		*0.385*	$66
14			Transmission	15,142		*0.369*	$56
15	15	Outdoor Area Lighting Service		2,054	0.016%	0.548	$11
16	51	Street Lighting Service Comp. Owned		7,381	0.050%	0.469	$35
17	53	Street Lighting Service Cust. Owned		7,519	0.015%	0.138	$10
18	54	Recreational Field Lighting		1,394	0.003%	0.138	$2
19		**Subtotal**		16,816,221	100.000%		$69,008
20		Employee Discount		*13,481*		*(0.111)*	($15)
21		**Total**		16,816,221			$68,993

[1] Includes tariff based ligting MWh.

Docket No. UE 421
Exhibit PAC/202
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

PACIFICORP

Exhibit Accompanying Direct Testimony of Judith M. Ridenour

Proposed Tariff Rate Schedule 206

May 2023

PACIFIC POWER
A DIVISION OF PACIFICORP

OREGON
SCHEDULE 206

Purpose

This schedule implements the Company's annual Power Cost Adjustment Mechanism adjustment consistent with Order No. 12-493.

Applicable

To all Residential Consumers and Nonresidential Consumers except Nonresidential Consumers who took service under Standard Offer Supply Service Schedule 220 or who were served under a Direct Access Delivery Service Schedule during the accrual period of this Power Cost Adjustment Mechanism adjustment.

Monthly Billing

The adjustment shall be calculated as an amount equal to the product of all kWh multiplied by the following applicable rate as listed by Delivery Service Schedule and by accrual period. (N)

Calendar Year 2021 Accrual Period

Delivery Service Schedule	**Secondary**	**Primary**	**Transmission**
Schedule 4, per kWh	0.114¢		
Schedule 5, per kWh	0.114¢		
Schedule 15, per kWh	0.172¢		
Schedule 23, 723, per kWh	0.108¢	0.098¢	
Schedule 28, 728, per kWh	0.108¢	0.107¢	
Schedule 30, 730, per kWh	0.106¢	0.107¢	
Schedule 41, 741, per kWh	0.103¢	0.101¢	
Schedule 47, 747, per kWh	0.106¢	0.101¢	0.095¢
Schedule 48, 748, per kWh	0.106¢	0.101¢	0.095¢
Schedule 51, 751, per kWh	0.146¢		
Schedule 53, 753, per kWh	0.043¢		
Schedule 54, 754, per kWh	0.043¢		

(continued)

Monthly Billing (continued) (N)

Calendar Year 2022 Accrual Period

Delivery Service Schedule	**Secondary**	**Primary**	**Transmission**
Schedule 4, per kWh	0.442¢		
Schedule 5, per kWh	0.442¢		
Schedule 15, per kWh	0.548¢		
Schedule 23, 723, per kWh	0.416¢	0.377¢	
Schedule 28, 728, per kWh	0.411¢	0.401¢	
Schedule 30, 730, per kWh	0.403¢	0.401¢	
Schedule 41, 741, per kWh	0.397¢	0.391¢	
Schedule 47, 747, per kWh	0.400¢	0.385¢	0.369¢
Schedule 48, 748, per kWh	0.400¢	0.385¢	0.369¢
Schedule 51, 751, per kWh	0.469¢		
Schedule 53, 753, per kWh	0.138¢		
Schedule 54, 754, per kWh	0.138¢		

(N)

Docket No. UE 421
Exhibit PAC/203
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

PACIFICORP

Exhibit Accompanying Direct Testimony of Judith M. Ridenour

Estimated Effect of Proposed Price Change and Monthly Billing Comparisons

May 2023

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, 2024

					Present Revenues ($000)			Proposed Revenues ($000)			Change				
											Base Rates		Net Rates		
Line No.	Description	Sch No.	No. of Cust	MWh	Base Rates	Adders[1]	Net Rates	Base Rates	Adders[1]	Net Rates	($000)	%[2]	($000)	%[2]	Line No.
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
							(5) + (6)			(8) + (9)	(8) - (5)	(11)/(5)	(10) - (7)	(13)/(7)	
	Residential														
1	Residential	4	540,041	5,829,081	$737,548	$8,977	$746,525	$737,548	$34,741	$772,290	$0	0.0%	$25,765	3.5%	1
2	**Total Residential**		540,041	5,829,081	$737,548	$8,977	$746,525	$737,548	$34,741	$772,290	$0	0.0%	$25,765	3.5%	2
	Commercial & Industrial														
3	Gen. Svc. < 31 kW	23	85,313	1,166,351	$149,483	$2,496	$151,978	$149,483	$7,346	$156,829	$0	0.0%	$4,851	3.2%	3
4	Gen. Svc. 31 - 200 kW	28	10,587	2,084,027	$186,116	$20,590	$206,706	$186,116	$29,153	$215,269	$0	0.0%	$8,563	4.1%	4
5	Gen. Svc. 201 - 999 kW	30	872	1,325,081	$105,890	$12,417	$118,307	$105,890	$17,755	$123,645	$0	0.0%	$5,338	4.5%	5
6	Large General Service >= 1,000 kW	48	182	6,123,426	$435,177	$16,877	$452,053	$435,177	$40,245	$475,422	$0	0.0%	$23,368	5.2%	6
7	Partial Req. Svc. >= 1,000 kW	47	6	32,263	$4,320	$88	$4,409	$4,320	$210	$4,531	$0	0.0%	$122	5.2%	7
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	1	0	$1,219	$111	$1,329	$1,219	$111	$1,329	$0	0.0%	$0	0.0%	8
9	Agricultural Pumping Service	41	7,913	237,644	$30,384	($2,916)	$27,468	$30,384	($1,972)	$28,412	$0	0.0%	$943	3.4%	9
10	**Total Commercial & Industrial**		104,874	10,968,792	$912,589	$49,663	$962,251	$912,589	$92,848	$1,005,436	$0	0.0%	$43,185	4.5%	10
	Lighting														
11	Outdoor Area Lighting Service	15	5,703	8,050	$788	$242	$1,031	$788	$254	$1,042	$0	0.0%	$11	1.1%	11
12	Street Lighting Service Comp. Owned	51	1,121	21,063	$2,715	$933	$3,648	$2,715	$967	$3,682	$0	0.0%	$35	1.0%	12
13	Street Lighting Service Cust. Owned	53	292	7,519	$392	$221	$613	$392	$231	$623	$0	0.0%	$10	1.7%	13
14	Recreational Field Lighting	54	100	1,394	$88	$52	$140	$88	$54	$142	$0	0.0%	$2	1.4%	14
15	**Total Public Street Lighting**		7,215	38,026	$3,983	$1,448	$5,431	$3,983	$1,506	$5,489	$0	0.0%	$58	1.1%	15
16	**Subtotal**		652,131	16,835,899	$1,654,120	$60,087	$1,714,207	$1,654,120	$129,095	$1,783,215	$0	0.0%	$69,008	4.0%	16
17	Emplolyee Discount		*975*	*13,481*	($419)	($5)	($424)	($419)	($20)	($439)	$0		($15)		17
17	Paperless Credit				($2,072)		($2,072)	($2,072)		($2,072)	$0		$0		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**		652,131	16,835,899	$1,656,916	$60,082	$1,716,998	$1,656,916	$129,075	$1,785,991	$0	0.0%	$68,993	4.0%	20

[1] Excludes effects of the Low Income Bill Payment Assistance Charge (Sch. 91), Low Income Discount Cost Recovery Adjustment (Sch. 92), 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

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 4 + Cost-Based Supply Service
Residential Service - Single Family

	Monthly Billing*			Percent
kWh	Present Price	Proposed Price	Difference	Difference
100	$24.02	$24.47	$0.45	1.87%
200	$35.49	$36.39	$0.90	2.54%
300	$46.97	$48.32	$1.35	2.87%
400	$58.45	$60.25	$1.80	3.08%
500	$69.92	$72.16	$2.24	3.20%
600	$81.40	$84.09	$2.69	3.30%
700	$92.88	$96.02	$3.14	3.38%
800	$104.36	$107.95	$3.59	3.44%
900	**$115.83**	**$119.86**	**$4.03**	**3.48%**
1,000	$127.30	$131.79	$4.49	3.53%
1,100	$138.78	$143.72	$4.94	3.56%
1,200	$150.25	$155.64	$5.39	3.59%
1,300	$161.73	$167.56	$5.83	3.60%
1,400	$173.21	$179.49	$6.28	3.63%
1,500	$184.68	$191.41	$6.73	3.64%
1,600	$196.16	$203.34	$7.18	3.66%
2,000	$242.06	$251.04	$8.98	3.71%
3,000	$366.55	$380.01	$13.46	3.67%
4,000	$491.04	$508.99	$17.95	3.66%
5,000	$615.53	$637.97	$22.44	3.65%

* Net rate including Schedules 91, 92, 98, 290 and 291.

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 4 + Cost-Based Supply Service
Residential Service - Multi-Family

kWh	Monthly Billing* Present Price	Monthly Billing* Proposed Price	Difference	Percent Difference
100	$20.98	$21.43	$0.45	2.14%
200	$32.45	$33.35	$0.90	2.77%
300	$43.93	$45.27	$1.34	3.05%
400	$55.41	$57.20	$1.79	3.23%
500	$66.87	$69.12	$2.25	3.36%
600	$78.35	$81.05	$2.70	3.45%
700	$89.83	$92.97	$3.14	3.50%
800	$101.31	$104.90	$3.59	3.54%
900	$112.78	$116.82	$4.04	3.58%
1,000	$124.26	$128.75	$4.49	3.61%
1,100	$135.74	$140.67	$4.93	3.63%
1,200	$147.21	$152.59	$5.38	3.65%
1,300	$158.69	$164.52	$5.83	3.67%
1,400	$170.17	$176.45	$6.28	3.69%
1,500	$181.63	$188.36	$6.73	3.71%
1,600	$193.11	$200.29	$7.18	3.72%
2,000	$239.02	$247.99	$8.97	3.75%
3,000	$363.51	$376.97	$13.46	3.70%
4,000	$488.00	$505.94	$17.94	3.68%
5,000	$612.49	$634.92	$22.43	3.66%

* Net rate including Schedules 91, 92, 98, 290 and 291.

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 23 + Cost-Based Supply Service
General Service - Secondary Delivery Voltage

		Monthly Billing*				Percent Difference	
		Present Price		Proposed Price			
kW Load Size	kWh	Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase
5	500	$78	$87	$81	$89	2.69%	2.42%
	750	$109	$118	$112	$121	2.91%	2.70%
	1,000	$139	$148	$144	$152	3.03%	2.85%
	1,500	$200	$209	$207	$215	3.16%	3.03%
10	1,000	$139	$148	$144	$152	3.03%	2.85%
	2,000	$261	$270	$270	$278	3.23%	3.13%
	3,000	$383	$392	$395	$404	3.31%	3.24%
	4,000	$489	$497	$506	$514	3.46%	3.40%
20	4,000	$524	$533	$541	$550	3.22%	3.17%
	6,000	$736	$745	$761	$770	3.44%	3.40%
	8,000	$948	$957	$982	$990	3.56%	3.53%
	10,000	$1,160	$1,168	$1,202	$1,210	3.64%	3.62%
30	9,000	$1,125	$1,134	$1,163	$1,172	3.38%	3.35%
	12,000	$1,443	$1,451	$1,493	$1,502	3.51%	3.49%
	15,000	$1,760	$1,769	$1,824	$1,832	3.60%	3.58%
	18,000	$2,078	$2,086	$2,154	$2,162	3.66%	3.64%

* Net rate including Schedules 91, 92, 290 and 291.

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 23 + Cost-Based Supply Service
General Service - Primary Delivery Voltage

kW		Monthly Billing*				Percent	
		Present Price		Proposed Price		Difference	
Load Size	kWh	Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase
5	500	$77	$86	$79	$88	2.47%	2.22%
	750	$107	$116	$110	$119	2.68%	2.48%
	1,000	$137	$146	$141	$150	2.80%	2.63%
	1,500	$197	$205	$202	$211	2.92%	2.79%
10	1,000	$137	$146	$141	$150	2.80%	2.63%
	2,000	$256	$265	$264	$273	2.98%	2.89%
	3,000	$376	$385	$387	$396	3.05%	2.99%
	4,000	$480	$488	$495	$504	3.19%	3.13%
20	4,000	$515	$524	$530	$539	2.97%	2.92%
	6,000	$723	$732	$746	$755	3.18%	3.14%
	8,000	$931	$939	$961	$970	3.29%	3.26%
	10,000	$1,139	$1,147	$1,177	$1,186	3.36%	3.33%
30	9,000	$1,106	$1,114	$1,140	$1,149	3.12%	3.09%
	12,000	$1,417	$1,426	$1,463	$1,472	3.24%	3.22%
	15,000	$1,729	$1,738	$1,786	$1,795	3.32%	3.30%
	18,000	$2,041	$2,049	$2,110	$2,118	3.38%	3.36%

* Net rate including Schedules 91, 92, 290 and 291.

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 28 + Cost-Based Supply Service
Large General Service - Secondary Delivery Voltage

kW Load Size	kWh	Monthly Billing* Present Price	Monthly Billing* Proposed Price	Percent Difference
15	3,000	$366	$378	3.42%
	4,500	$485	$504	3.87%
	7,500	$724	$755	4.32%
31	6,200	$737	$763	3.51%
	9,300	$983	$1,022	3.94%
	15,500	$1,477	$1,541	4.38%
40	8,000	$945	$979	3.53%
	12,000	$1,264	$1,314	3.96%
	20,000	$1,900	$1,984	4.39%
60	12,000	$1,410	$1,460	3.55%
	18,000	$1,887	$1,962	3.98%
	30,000	$2,842	$2,967	4.40%
80	16,000	$1,868	$1,935	3.57%
	24,000	$2,505	$2,605	4.00%
	40,000	$3,778	$3,945	4.42%
100	20,000	$2,327	$2,410	3.59%
	30,000	$3,122	$3,248	4.01%
	50,000	$4,714	$4,923	4.42%
200	40,000	$4,595	$4,762	3.63%
	60,000	$6,187	$6,437	4.05%
	100,000	$9,370	$9,788	4.45%

* Net rate including Schedules 91, 92, 290 and 291.

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 28 + Cost-Based Supply Service
Large General Service - Primary Delivery Voltage

kW Load Size	kWh	Monthly Billing* Present Price	Monthly Billing* Proposed Price	Percent Difference
15	4,500	$448	$466	4.09%
	6,000	$560	$584	4.36%
	7,500	$671	$702	4.55%
31	9,300	$906	$944	4.18%
	12,400	$1,137	$1,187	4.44%
	15,500	$1,368	$1,431	4.61%
40	12,000	$1,163	$1,212	4.20%
	16,000	$1,462	$1,527	4.45%
	20,000	$1,760	$1,842	4.63%
60	18,000	$1,737	$1,810	4.22%
	24,000	$2,185	$2,282	4.47%
	30,000	$2,632	$2,754	4.64%
80	24,000	$2,305	$2,403	4.24%
	32,000	$2,902	$3,032	4.49%
	40,000	$3,499	$3,662	4.65%
100	30,000	$2,874	$2,996	4.25%
	40,000	$3,620	$3,783	4.50%
	50,000	$4,366	$4,569	4.66%
200	60,000	$5,696	$5,940	4.29%
	80,000	$7,188	$7,514	4.53%
	100,000	$8,680	$9,087	4.69%

* Net rate including Schedules 91, 92, 290 and 291.

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 30 + Cost-Based Supply Service
Large General Service - Secondary Delivery Voltage

kW Load Size	kWh	Monthly Billing* Present Price	Monthly Billing* Proposed Price	Percent Difference
100	20,000	$2,795	$2,877	2.93%
	30,000	$3,363	$3,486	3.65%
	50,000	$4,500	$4,704	4.55%
200	40,000	$5,148	$5,311	3.18%
	60,000	$6,284	$6,530	3.91%
	100,000	$8,557	$8,966	4.78%
300	60,000	$7,658	$7,903	3.20%
	90,000	$9,362	$9,731	3.93%
	150,000	$12,772	$13,386	4.80%
400	80,000	$10,054	$10,381	3.25%
	120,000	$12,327	$12,818	3.98%
	200,000	$16,873	$17,691	4.85%
500	100,000	$12,482	$12,891	3.28%
	150,000	$15,324	$15,937	4.00%
	250,000	$21,007	$22,029	4.87%
600	120,000	$14,911	$15,402	3.29%
	180,000	$18,321	$19,057	4.02%
	300,000	$25,140	$26,367	4.88%
800	160,000	$19,768	$20,423	3.31%
	240,000	$24,315	$25,296	4.04%
	400,000	$33,407	$35,043	4.90%
1000	200,000	$24,626	$25,444	3.32%
	300,000	$30,309	$31,536	4.05%
	500,000	$41,647	$43,692	4.91%

* Net rate including Schedules 91, 92, 290 and 291.

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 30 + Cost-Based Supply Service
Large General Service - Primary Delivery Voltage

kW Load Size	kWh	Monthly Billing* Present Price	Monthly Billing* Proposed Price	Percent Difference
100	30,000	$3,318	$3,440	3.68%
	40,000	$3,882	$4,045	4.19%
	50,000	$4,446	$4,650	4.58%
200	60,000	$6,220	$6,464	3.93%
	80,000	$7,349	$7,674	4.43%
	100,000	$8,477	$8,884	4.80%
300	90,000	$9,265	$9,631	3.95%
	120,000	$10,958	$11,446	4.46%
	150,000	$12,650	$13,261	4.83%
400	120,000	$12,237	$12,725	3.99%
	160,000	$14,493	$15,145	4.49%
	200,000	$16,750	$17,564	4.86%
500	150,000	$15,210	$15,821	4.01%
	200,000	$18,031	$18,845	4.51%
	250,000	$20,852	$21,870	4.88%
600	180,000	$18,184	$18,916	4.03%
	240,000	$21,569	$22,546	4.53%
	300,000	$24,954	$26,176	4.89%
800	240,000	$24,131	$25,108	4.05%
	320,000	$28,645	$29,947	4.55%
	400,000	$33,159	$34,787	4.91%
1000	300,000	$30,078	$31,299	4.06%
	400,000	$35,721	$37,349	4.56%
	500,000	$41,335	$43,371	4.92%

* Net rate including Schedules 91, 92, 290 and 291.

Pacific Power
Billing Comparison
Delivery Service Schedule 41 + Cost-Based Supply Service
Agricultural Pumping - Secondary Delivery Voltage

		Present Price*		Proposed Price*		Percent Difference	
kW Load Size	kWh	Monthly Bill	Annual Load Size Charge	Monthly Bill	Annual Load Size Charge	April - November Monthly Bill	Annual Load Size Charge
Single Phase							
10	2,000	$200	$174	$208	$174	4.03%	0.00%
	3,000	$300	$174	$312	$174	4.03%	0.00%
	5,000	$499	$174	$520	$174	4.03%	0.00%
Three Phase							
20	4,000	$400	$347	$416	$347	4.03%	0.00%
	6,000	$599	$347	$623	$347	4.03%	0.00%
	10,000	$999	$347	$1,039	$347	4.03%	0.00%
100	20,000	$1,998	$1,604	$2,078	$1,604	4.03%	0.00%
	30,000	$2,996	$1,604	$3,117	$1,604	4.03%	0.00%
	50,000	$4,994	$1,604	$5,195	$1,604	4.03%	0.00%
300	60,000	$5,993	$3,980	$6,235	$3,980	4.03%	0.00%
	90,000	$8,989	$3,980	$9,352	$3,980	4.03%	0.00%
	150,000	$14,982	$3,980	$15,586	$3,980	4.03%	0.00%

* Net rate including Schedules 91, 92, 98, 290 and 291.

Pacific Power
Billing Comparison
Delivery Service Schedule 41 + Cost-Based Supply Service
Agricultural Pumping - Primary Delivery Voltage

		Present Price*		Proposed Price*		Percent Difference	
kW Load Size	kWh	Monthly Bill	Annual Load Size Charge	Monthly Bill	Annual Load Size Charge	April - November Monthly Bill	Annual Load Size Charge
Single Phase							
10	3,000	$294	$172	$306	$172	4.05%	0.00%
	4,000	$392	$172	$408	$172	4.04%	0.00%
	5,000	$490	$172	$510	$172	4.05%	0.00%
Three Phase							
20	6,000	$589	$343	$612	$343	4.05%	0.00%
	8,000	$785	$343	$817	$343	4.05%	0.00%
	10,000	$981	$343	$1,021	$343	4.05%	0.00%
100	30,000	$2,943	$1,573	$3,062	$1,573	4.05%	0.00%
	40,000	$3,924	$1,573	$4,083	$1,573	4.05%	0.00%
	50,000	$4,905	$1,573	$5,103	$1,573	4.05%	0.00%
300	90,000	$8,828	$3,909	$9,186	$3,909	4.05%	0.00%
	120,000	$11,771	$3,909	$12,247	$3,909	4.05%	0.00%
	150,000	$14,714	$3,909	$15,309	$3,909	4.05%	0.00%

* Net rate including Schedules 91, 92, 98, 290 and 291.

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 48 + Cost-Based Supply Service
Large General Service - Secondary Delivery Voltage
1,000 kW and Over

kW Load Size	kWh	Monthly Billing Present Price	Monthly Billing Proposed Price	Percent Difference
1,000	300,000	$29,758	$30,976	4.09%
	500,000	$42,017	$44,047	4.83%
	700,000	$54,020	$56,862	5.26%
2,000	600,000	$58,757	$61,193	4.15%
	1,000,000	$80,935	$85,083	5.13%
	1,400,000	$104,018	$109,825	5.58%
6,000	1,800,000	$160,846	$168,312	4.64%
	3,000,000	$230,095	$242,539	5.41%
	4,200,000	$299,344	$316,766	5.82%
12,000	3,600,000	$319,350	$334,283	4.68%
	6,000,000	$457,848	$482,736	5.44%
	8,400,000	$596,346	$631,190	5.84%

Notes:

On-Peak kWh	38.11%
Off-Peak kWh	61.89%

* Net rate including Schedules 91, 92, 290 and 291. Restricted Sch 291 applied to levels over 730,000 kWh.

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 48 + Cost-Based Supply Service
Large General Service - Primary Delivery Voltage
1,000 kW and Over

kW Load Size	kWh	Monthly Billing Present Price	Monthly Billing Proposed Price	Percent Difference
1,000	300,000	$28,147	$29,319	4.17%
	500,000	$40,172	$42,126	4.86%
	700,000	$51,940	$54,676	5.27%
2,000	600,000	$55,546	$57,891	4.22%
	1,000,000	$77,175	$81,168	5.17%
	1,400,000	$99,779	$105,369	5.60%
6,000	1,800,000	$157,538	$164,725	4.56%
	3,000,000	$225,349	$237,327	5.32%
	4,200,000	$293,160	$309,929	5.72%
12,000	3,600,000	$312,765	$327,138	4.60%
	6,000,000	$448,387	$472,342	5.34%
	8,400,000	$584,009	$617,547	5.74%

Notes:

On-Peak kWh	37.88%
Off-Peak kWh	62.12%

* Net rate including Schedules 91, 92, 290 and 291. Restricted Sch 291 applied to levels over 730,000 kWh.

Pacific Power
Monthly Billing Comparison
Delivery Service Schedule 48 + Cost-Based Supply Service
Large General Service - Transmission Delivery Voltage
1,000 kW and Over

kW Load Size	kWh	Monthly Billing Present Price	Monthly Billing Proposed Price	Percent Difference
1,000	500,000	$38,289	$40,161	4.89%
	700,000	$49,620	$52,242	5.28%
2,000	1,000,000	$73,182	$77,009	5.23%
	1,400,000	$94,893	$100,251	5.65%
6,000	3,000,000	$216,614	$228,094	5.30%
	4,200,000	$281,749	$297,821	5.70%
12,000	6,000,000	$430,659	$453,619	5.33%
	8,400,000	$560,928	$593,071	5.73%

Notes:

On-Peak kWh	37.63%
Off-Peak kWh	62.37%

* Net rate including Schedules 91, 92, 290 and 291. Restricted Sch 291 applied to levels over 730,000 kWh.