

March 8, 2021

***VIA ELECTRONIC FILING***

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

**RE: UM\_\_\_—Application for Approval of Deferred Accounting for a Balancing Account Related to Schedule 95, Pilot Program Cost Adjustment**

PacifiCorp d/b/a Pacific Power submits for filing its Application for Approval of Deferred Accounting for a Balancing Account Related to PacifiCorp's Schedule 95, Pilot Program Cost Adjustment.

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](mailto:oregondockets@pacificorp.com)

Ajay Kumar, OSB #183903  
Senior Attorney  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[Ajay.Kumar@pacificorp.com](mailto:Ajay.Kumar@pacificorp.com)

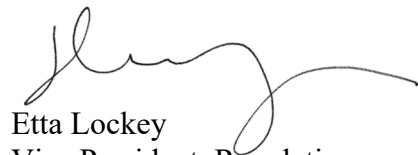
Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com).

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

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

Sincerely,



Etta Lockey  
Vice President, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM \_\_\_\_\_

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred Accounting  
for a Balancing Account Related to Schedule 95,  
Pilot Program Cost Adjustment.

**APPLICATION FOR DEFERRED  
ACCOUNTING**

**I. INTRODUCTION**

In accordance with Oregon Revised Statutes (ORS) 757.259(2)(e) and Oregon Administrative Rules (OAR) 860-027-0300, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) submits this application to the Public Utility Commission of Oregon (Commission) for an order authorizing the company to establish and maintain a balancing account to record the deferral of costs related to PacifiCorp's Schedule 95, Irrigation Load Control Program Pilot (Load Control Program), expense. PacifiCorp proposes to record in the balancing account expenses for the Load Control Program and recover those costs through Schedule 95, Pilot Program Cost Adjustment (Schedule 95).

**II. NOTICE**

Communications regarding this application should be addressed to:

Oregon Dockets  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
Email: [oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

Ajay Kumar  
Senior Attorney  
PacifiCorp  
825 NE Multnomah Street, Suite 1800  
Portland, OR 97232  
Email: [ajay.kumar@pacificorp.com](mailto:ajay.kumar@pacificorp.com)

In addition, PacifiCorp requests that all data requests regarding this application be sent to the following:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

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

Informal questions may be directed to Cathie Allen, Manager, Regulatory Affairs, at (503) 813-6583.

### **III. BACKGROUND**

On March 4, 2016, PacifiCorp filed an application proposing its Irrigation Load Control Program Pilot, which is a demand response program for irrigation customers. On May 4, 2016, the Commission approved the program. On April 21, 2016, PacifiCorp filed Tariff Advice No. 16-07 to implement Schedule 95 to recover costs associated with the Irrigation Load Control Program Pilot. On May 5, 2016, the Commission approved PacifiCorp's Schedule 95. PacifiCorp filed an update to Schedule 95 under Advice No. 16-07 on May 12, 2017.

After discussions with Staff, PacifiCorp has determined that it is appropriate to file a deferral to support the expenses in the Irrigation Load Control Pilot Program as they are recovered through Schedule 95. Therefore, the Company now files this deferral application to obtain approval for the deferred accounting necessary for the existing Load Control Program to track costs and allow for recovery of those costs through Schedule 95.

### **IV. DEFERRAL OF COSTS**

PacifiCorp respectfully requests authorization under ORS 757.259(2)(e) to establish and maintain a balancing account to record costs related to the Load Control Program.

As required by OAR 860-027-0300(3), PacifiCorp provides the following:

**A. Description of Utility Expense**

PacifiCorp proposes to use a Load Control Program balancing account to record Load Control Program expenses and collections from Schedule 95.

**B. Reasons for Deferral**

ORS 757.259(2)(e) allows the deferral of identifiable utility expenses in order to minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately the costs borne and received by customers. In this application PacifiCorp seeks the use of a deferral to support an existing rate tracking mechanism which matches the costs borne and benefits received by customers.

**C. Proposed Accounting**

If this application is approved, PacifiCorp will record both Load Control Program expenses and Schedule 95 recovery in FERC Account 182.3, Other Regulatory Assets. If this application is denied, Load Control Program expenses will be recorded in FERC account 557, Other Expenses, and the revenues from Schedule 95 will be recorded in FERC account 456, Other Electric Revenues.

**D. Estimate of Amounts**

At this time, the 2021 Load Control Program expense is forecasted to be between approximately \$325,00 and \$425,000. These estimates align with Advice 19-008 and reflect the addition of new customers and switch installations, which, during the 2020 season, did not materialize as the results of COVID-19. For comparison 2020 program expenses which did not include any added customers or switches (as a result of the COVID-19 pandemic) are estimated to be approximately \$176,000. The residual balance from the Load Control Program prior to this filing is \$194,472.21. Generally, it is expected that the balancing account will zero out over time.

**E. Notice**

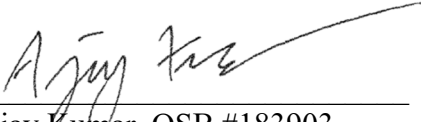
A copy of the Notice of Application and a list of persons served with the notice are attached as Exhibit A to this application.

**V. CONCLUSION**

PacifiCorp respectfully requests that, in accordance with ORS 757.259(2)(e), the Commission authorize the Company to maintain a balancing account related to PacifiCorp's Load Control Program expense and collection of the Load Control Program through Schedule 95.

Respectfully submitted this 8<sup>th</sup> day of March, 2021.

By:

  
Ajay Kumar, OSB #183903  
Senior Attorney  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232

## **Exhibit A**

### Notice of Application

**EXHIBIT A**  
**NOTICE**  
**BEFORE THE PUBLIC UTILITY COMMISSION**  
**OF OREGON**

UM \_\_\_\_\_

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred Accounting  
for a Balancing Account Related to Schedule 95,  
Pilot Program Cost Adjustment.

**NOTICE OF**  
**APPLICATION FOR DEFERRED**  
**ACCOUNTING**

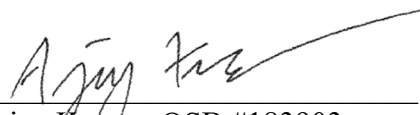
On March 8, 2021, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) filed an application with the Public Utility Commission of Oregon (Commission) for an order authorizing the Company to establish and maintain a balancing account to record the deferral of costs and recovery related to PacifiCorp's Schedule 95, Pilot Program Cost Adjustment. The granting of this application will not authorize a change in rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding. To obtain a copy of the application, contact the following:

Oregon Dockets  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
Email: [oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

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

Respectfully submitted on March 8, 2021.

By:

  
Ajay Kumar, OSB #183903  
Senior Attorney

## CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of PacifiCorp's **Notice of Application for Approval of Deferred Accounting for a Balancing Account Related to Schedule 95, Pilot Program Cost Adjustment** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

### Service List UE 374

BILL EHRLICH (C) (HC) TESLA 3500 DEER CREEK RD PALO ALTO CA 94304 <a href="mailto:wehrlich@tesla.com">wehrlich@tesla.com</a>	STEVE ELZINGA (C) CHARGEPOINT INC 693 CHEMEKETA ST NE SALEM OR 97301 <a href="mailto:steve@shermlaw.com">steve@shermlaw.com</a>
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<b>PACIFICORP</b>	
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<p>ETTA LOCKEY (C)  PACIFIC POWER  825 NE MULTNOMAH ST., STE 2000  PORTLAND OR 97232  <a href="mailto:etta.lockey@pacificorp.com">etta.lockey@pacificorp.com</a></p>	
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<p><b>TESLA INC</b></p>	
<p>KEVIN AUERBACHER (C) (HC)  TESLA, INC.  601 13TH ST NW, 9TH FL NORTH  WASHINGTON DC 20005  <a href="mailto:kauerbacher@tesla.com">kauerbacher@tesla.com</a></p>	<p>JOHN DUNBAR (C) (HC)  DUNBAR LAW LLC  621 SW MORRISON STREET STE 1025  PORTLAND OR 97205  <a href="mailto:jdunbar@dunbarlawllc.com">jdunbar@dunbarlawllc.com</a></p>
<p><b>VITESSE LLC</b></p>	
<p>R BRYCE DALLEY (C)  FACEBOOK INC  2400 S BERTSINGER RD  RIDGFIELD WA 98642  <a href="mailto:rbd@fb.com">rbd@fb.com</a></p>	<p>LIZ FERRELL (C)  FACEBOOK, INC.  1 HACKER WAY  MENLO PARK CA 94205  <a href="mailto:eferrell@fb.com">eferrell@fb.com</a></p>

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Dated this 8<sup>th</sup> day of March, 2021.




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Katie Savarin  
Coordinator, Regulatory Operations