



825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232

November 20, 2023

VIA ELECTRONIC FILING

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

RE: UE 421—Responses to ALJ Bench Requests No. 1-1 through 1-4

Pursuant to Administrative Law Judge (ALJ) Mapes' Bench Request dated November 8, 2023, enclosed for filing in this docket is the response of PacifiCorp to ALJ Bench Requests No. 1-1 through 1-4.

Please direct any questions regarding this filing to Cathie Allen at (503) 813-5934.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew McVee".

Matthew McVee
Vice President, Regulatory Policy and Operations

UE 421 / PacifiCorp
November 20, 2023
Bench Request 1

Bench Request 1

Identify each separate rate adjustment (e.g., schedule, AAC, amortization, or other rate adjustment) proposed to change between now and May 1, 2024, inclusive, specifying the proposed or anticipated effective date, and the proposed or authorized change associated with each, expressed both in dollar and percentage terms.

Response to Bench Request 1

Please refer to Attachment Bench Request 1 which provides a list of PacifiCorp rate changes currently proposed to take place between now and May 1, 2024 along with the requested information. PacifiCorp has other ongoing proceedings that could change rates before May 1, 2024, and may file additional requests to address cost increases or decreases, but are not currently anticipated to do so. At this time, PacifiCorp does not have any rate changes proposed for November 20, 2023 through December 31, 2023. Please note that PacifiCorp anticipates an increase in the amount collected under Schedule 291 (System Benefits Charge), based on the proposed Energy Trust of Oregon budget for 2024 and beginning April 1, 2024.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

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Bench Request 2

Bench Request 2

Provide bill impacts by customer class for any projected increases to customer rates proposed to be effective between now and December 31, 2023, (e.g., ADV 1529/Advice 23-015-Schedule 190-Wildfire Mitigation Plan Cost Recovery Adjustment). Include as part of this response the overall projected bill impact for the typical residential customer for all adjustments proposed during this period.

Response to Bench Request 2

Please refer to the Company's response to Bench Data Request 1. PacifiCorp does not currently anticipate any rate changes to be effective between now and December 1, 2023. The requested effective date for Advice 23-015 previously set to December 13, 2023 has been revised a second time through a filing made on November 17, 2023 to be January 10, 2024.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

Bench Request 3

Refer to the stipulations filed in docket UE 421 (October 6, 2023) and docket UE 420 (September 12, 2023) ("PacifiCorp agrees that if the combined January 1, 2024 rate increase for residential customers from the 2024 TAM, 2022 PCAM, the Renewable Adjustment Clause rate change, and any other rate change exceeds 15 percent, PacifiCorp will seek to delay the rate effective date of revised Schedule 206, the PCAM tariff, until April 1, to keep the rate increase to residential customers below 15 percent.")

- (a) Please confirm which, if any, of the proposed rate adjustments, identified in response to Bench Request 1, will be included in the combined January 1, 2024, rate increase for residential customers for purposes of this provision of the stipulations.
- (b) In the event the combined effect of the January 1, 2024, rate adjustments, excluding the 2022 power cost adjustment, would result in an increase of over 15 percent for residential customers, please address how the company would propose to keep the January 1, 2024, increase below 15 percent.

Response to Bench Request 3

- (a) The four rate changes listed in the Company's response to Bench Request 1, specifically Attachment Bench Request 1, for January 1, 2024 will be included in the combined January 1, 2024 rate increase for residential customers for purposes of that provision of the stipulations. The four rate changes are:
 - Renewable Adjustment Clause (RAC), Docket UE 419
 - Transition Adjustment Mechanism (TAM), Docket UE 420
 - Power Cost Adjustment Mechanism (PCAM), Docket UE 421
 - Schedule 204, Oregon Solar Incentive Program Deferral Adjustment, Advice No. 23-019
- (b) The stipulation agreed to postpone the rate effective date for the residential rate change in the PCAM until April 1, 2024, if the combined effect of the rate adjustments for residential customers identified above exceeded 15 percent. Delaying the increase from the PCAM was expected to be sufficient to keep the combined January 1, 2024 rate increases below 15 percent. However, with the final results of the TAM now known as part of the compliance filing made on November 15, 2023, the combined January 1, 2024 rate change for residential customers will not exceed 15 percent, either with or without the 2022 PCAM. The combined January 1, 2024 residential rate impact of the four rate changes for January 1, 2024 listed above including the PCAM would

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Bench Request 3

be 11.1 percent which would not trigger the residential rate impact provision of the stipulations. Referencing the Company's response to Bench Request 1, specifically Attachment Bench Request 1, the residential rate impact of each of the four rate changes is shown in the last column of Attachment Bench Request 1 and the residential row of Attachment Bench Request Data Response 4, provided with the Company's response to Bench Request 4.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

Bench Request 4

Provide bill impacts by customer class under each of the scenarios set forth below. This should include the changes to the transition adjustment mechanism, power cost adjustment mechanism, and any other rate adjustments anticipated or proposed for effect January 1, 2024. Include as part of these responses the overall projected bill impact for the typical residential customer.

- (a) The overall impact of the rate adjustments proposed for effect January 1, 2024, without applying the provision in the docket No. UE 420 and UE 421 stipulations to limit the January 1, 2024, residential rate increase to 15 percent (i.e., the bill impacts that would result absent this provision of the stipulation).
- (b) The overall impact of the rate adjustments proposed for effect on each January 1, 2024, and April 1, 2024, applying the provision in the docket UE 420 and UE 421 stipulations to limit the January 1, 2024, residential rate increase to 15 percent.
- (c) The overall combined impact of all rate adjustments proposed to be effective now through January 1, 2024, without applying the provision in the docket UE 420 and UE 421 stipulations to limit the January 1, 2024, residential rate increase to 15 percent (i.e., the bill impacts that would result absent this provision of the stipulation).
- (d) The overall combined impact of all rate adjustments proposed to be effective now through January 1, 2024, applying the provision in the docket UE 420 and UE 421 stipulations to limit the January 1, 2024, residential rate increase to 15 percent.

Response to Bench Request 4

- (a) Please refer to Attachment Bench Request 4 which provides the percentage rate impacts by class of each of the four PacifiCorp rate adjustments proposed to become effective January 1, 2024 along with the combined total percentage rate impact for January 1. The four rate adjustments are:
 - Renewable Adjustment Clause (RAC), Docket UE 419
 - Transition Adjustment Mechanism (TAM), Docket UE 420
 - Power Cost Adjustment Mechanism (PCAM), Docket UE 421
 - Schedule 204, Oregon Solar Incentive Program Deferral Adjustment, Advice No. 23-019

The total combined residential rate increase for January 1, 2024 including all four rate changes is 11.1 percent and does not trigger the residential rate

impact provision of the stipulation. Note: the attachment also shows the dollar impact on the monthly bill for the typical residential customer using 900 kilowatt-hours per month (kWh per month). The combined impact for January 1, 2024 is \$12.83 per month.

- (b) Since the combined residential rate impact for January 1, 2024 of all four rate changes is less than 15 percent, the residential rate impact provision of the stipulation is not triggered and the total combined rate impacts by rate schedule shown in Attachment Bench Request Data Response 4 remain accurate. There will be no rate change on April 1, 2024 related to the rate impact provision of the stipulation.
- (c) Please refer to the Company's response to Bench Request 1. No rate changes are anticipated between now and December 31, 2023, therefore the total combined rate impacts by rate schedule shown in Attachment Bench Request Data Response 4 remain accurate. If the January 10, 2024 estimated residential rate increase for the Wildfire Mitigation Plan (WMP) of 2.1 percent is added to the combined January 1, 2024 residential rate increase the total residential rate increase would be 13.2 percent.
- (d) Please refer to the Company's responses to subparts (a) through (c) above.

PacifiCorp
 State of Oregon
 List of Proposed Rate Changes from November 20, 2023 through May 1, 2024

Effective Date	Mechanism/ Schedule	Docket/Advice No.	Approved/ Approval Pending	Order No.	Compliance Advice?	Direction of Rate Change	Overall Known/ Estimated Rate Impact		Residential Known/ Estimated Rate Impact	
							<i>Dollars</i>	<i>Percentage</i>	<i>Dollars</i>	<i>Percentage</i>
January 1, 2024	Renewable Adjustment Clause (RAC)	UE 419	Approved	23-282	Pending	Increase	3.1 million	0.2%	1.2 million	0.2%
	Transition Adjustment Mechanism (TAM)	UE 420	Approved	23-404	23-021	Increase	149.6 million	8.7%	55.8 million	7.5%
	Power Cost Adjustment Mechanism (PCAM)	UE 421	Pending	Pending	Pending	Increase	69.0 million	4.0%	25.8 million	3.5%
	Schedule 204, Oregon Solar Incentive Program Deferral Adjustment	23-019	Pending	N/A	N/A	Decrease	-2.3 million	-0.1%	-0.8 million	-0.1%
						Total Combined January 1		12.8%		11.1%
January 2, 2024	Schedule 91, Low Income Bill Payment Assistance Fund	23-020	Pending	N/A	N/A	Decrease	-4.0 million	-0.2%	-2.3 million	-0.3%
January 10, 2024*	Schedule 190, Wildfire Mitigation Adjustment	23-015	Pending	N/A	N/A	Increase	25.7 million	1.5%	16.1 million	2.1%

* The effective date for Advice 23-015 was revised to January 10, 2024 in a filing update made on Friday, November 17, 2023.

**PacifiCorp
State of Oregon
Estimated Effect of Proposed Rate Changes for January 1, 2024 by Rate Schedule**

	<u>Sch.</u>	<u>RAC</u>	<u>TAM</u>	<u>PCAM</u>	<u>Sch 204 OSIP</u>	<u>January 1, 2024 Total</u>
<u>Residential</u>						
Residential	4	0.2%	7.5%	3.5%	-0.1%	11.1%
<i>Typical 900kWh Residential customer monthly bill impact:</i>		\$0.18	\$8.75	\$4.03	(\$0.13)	\$12.83
<u>Commercial & Industrial</u>						
Gen. Svc. < 31 kW	23	0.2%	6.9%	3.2%	-0.1%	10.2%
Gen. Svc. 31 - 200 kW	28	0.2%	9.0%	4.1%	-0.1%	13.2%
Gen. Svc. 201 - 999 kW	30	0.2%	9.8%	4.5%	-0.2%	14.3%
Large General Service >= 1,000 kW	48	0.2%	11.2%	5.2%	-0.2%	16.4%
Partial Req. Svc. >= 1,000 kW	47	0.2%	11.2%	5.2%	-0.2%	16.4%
Dist. Only Lg Gen Svc >= 1,000 kW	848	0.0%	0.0%	0.0%	0.0%	0.0%
Agricultural Pumping Service	41	0.2%	7.5%	3.4%	-0.1%	11.0%
Total Commercial & Industrial		0.2%	9.7%	4.5%	-0.2%	14.2%
<u>Lighting</u>						
Outdoor Area Lighting Service	15	0.0%	2.4%	1.1%	0.0%	3.5%
Street Lighting Service Comp. Owned	51	0.0%	2.1%	1.0%	0.0%	3.1%
Street Lighting Service Cust. Owned	53	0.2%	3.7%	1.7%	0.0%	5.6%
Recreational Field Lighting	54	0.1%	3.0%	1.4%	0.0%	4.5%
Total Public Street Lighting		0.1%	2.3%	1.1%	0.0%	3.5%
Overall		0.2%	8.7%	4.0%	-0.1%	12.8%