



825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

May 15, 2020

***VIA ELECTRONIC FILING***

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

**Re: UM 1483(10)—PacifiCorp Application for Reauthorization for Deferred Accounting**

Enclosed for filing by PacifiCorp d/b/a Pacific Power is an Application for Reauthorization for Deferred Accounting to defer the costs associated with the photovoltaic feed-in-tariff program required by ORS 757.365. A copy of the enclosed Notice has been served on all parties in docket UM 1483 as indicated on the attached Certificate of Service.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Wilding".

Michael Wilding  
Director, Regulation

Enclosures

cc: Service List UM 1483

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1483(10)**

In the Matter of  
PACIFICORP d/b/a PACIFIC POWER  
Application for Reauthorization for  
Deferred Accounting

**APPLICATION FOR  
REAUTHORIZATION FOR  
DEFERRED ACCOUNTING**

Per ORS 757.259, ORS 757.365(10), and ORS 469A.120(1) and (3), and in accordance with OAR 860-027-0300, PacifiCorp d/b/a Pacific Power applies to the Public Utility Commission of Oregon (Commission) for an order reauthorizing the company to defer the costs and expenses associated with the photovoltaic feed-in tariff pilot program, known as the Oregon Solar Incentive Program, for the 12-month period beginning May 19, 2020 (the Application). Reauthorization to defer the requested costs is necessary to allow PacifiCorp to recover costs associated with compliance with ORS 757.365, as required by ORS 757.365(10).

In support of this Application, PacifiCorp states:

**I. NOTICE**

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

Matthew McVee  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, Oregon 97232  
Email: [matthew.mcvee@pacificorp.com](mailto:matthew.mcvee@pacificorp.com)

In addition, PacifiCorp requests that all information 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, Oregon 97232

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

## II. STATUTORY AND REGULATORY FRAMEWORK

### A. Oregon Solar Incentive Program

In docket AR 538, the Commission adopted rules to establish a solar photovoltaic feed-in tariff pilot program, as required by ORS 757.365.<sup>1</sup> In docket UM 1452, the Commission established volumetric incentive rates for solar photovoltaic energy systems.<sup>2</sup> PacifiCorp is implementing the solar photovoltaic feed-in tariff program (for Pacific Power, the program is known as the Oregon Solar Incentive Program) through Schedules 136 and 137. Additionally, Schedule 204<sup>3</sup> has been adopted for recovery of the costs authorized under the deferral approved in the docket.

### B. Statutory Authority

PacifiCorp files its Application under ORS 757.259, ORS 757.365(10), and ORS 469A.120(1) and (3).<sup>4</sup> As discussed in PacifiCorp's initial Application for Deferred Accounting in this docket, ORS 757.365(10) provides the Commission authority, independent of other statutes, to authorize deferral of costs associated with compliance with ORS 757.365(10). Additionally, ORS 469A.120(1) and (3) addresses costs associated with compliance with the Oregon Renewable Portfolio Standards (RPS). Finally, the Commission should reauthorize deferral under ORS 757.259.<sup>5</sup> The Commission can approve this

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<sup>1</sup> See Order No. 10-200.

<sup>2</sup> See Order Nos. 10-198, 10-304 and 11-089.

<sup>3</sup> The latest approval for cost recovery was through Order No. 17-516 in Docket No. UE 334 for rates effective on and after January 1, 2018.

<sup>4</sup> Order No. 17-305 approved Staff's recommendation to approve reauthorization under all three statutes: ORS 757.259, 757.365(10), and 469A.120(1) and (3).

<sup>5</sup> See, *Re PacifiCorp Application for Deferred Accounting Order* in Docket No. UM 1483 (May 19, 2010) for a discussion of the applicable legal standard.

Application under any of these statutes, and PacifiCorp requests approve under all or any one, or more, in the alternative.

**C. Request for Reauthorization of Deferral**

In this docket, pursuant to Order No. 11-021, the Commission originally authorized deferral of the costs associated with compliance of ORS 757.365 for the 12-month period beginning May 19, 2010.<sup>6</sup> PacifiCorp seeks reauthorization of this deferral for a 12-month period beginning May 19, 2020.

**III. DEFERRAL OF COSTS**

**A. Description of Utility Expense.**

PacifiCorp requests reauthorization to defer costs associated with the Oregon Solar Incentive Program. After PacifiCorp filed its initial application to defer the costs on May 19, 2010, in docket UM 1483, Commission Staff convened two workshops with interested parties on August 18, 2010, and September 21, 2010, to discuss PacifiCorp’s deferral application, along with Portland General Electric Company’s similar deferral application. Through these workshops, the utilities, Commission Staff, and interested stakeholders reached agreement on a number of issues related to the deferrals for solar incentive programs, including the timing of filings, formats and types of costs to be recovered through

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<sup>6</sup> In 2011, the Commission reauthorized, pursuant to Order No. 11-251, the deferral of the costs with compliance of ORS 757.365 for the 12-month period beginning May 19, 2011. In 2012, the Commission reauthorized, pursuant to Order No. 12-370, the deferral of the costs with compliance with ORS 757.365 for the 12-month period beginning May 19, 2012. In 2013, the Commission reauthorized, pursuant to Order No. 13-249, the deferral of the costs with compliance of ORS 757.365 for the 12-month period beginning May 19, 2013. In 2014, the Commission reauthorized, pursuant to Order No. 14-208 the deferral of the costs with compliance of ORS 757.365 for the 12-month period beginning May 19, 2014, Order No. 15-360 reauthorized the deferral of these costs for the 12-month period beginning May 19, 2015, Order No. 16-411 reauthorized the deferral of these costs for the 12-month period beginning May 19, 2016, Order No. 17-305 reauthorized the deferral for the 12-month period beginning May 19, 2017, Order No. 18-227 reauthorized the deferral for the 12-month period beginning May 19, 2018, and Order No. 19-230 reauthorized the deferral for the 12-month period beginning May 19, 2019.

the deferral. The costs to be deferred would include any administrative, marketing, metering, incentive payments and any other costs incurred by PacifiCorp for purposes of implementing the pilot program, consistent with this agreement. For this program year through April 2020, PacifiCorp has deferred approximately \$2.0 million of costs associated with the program.

**B. Reasons for Deferral**

As described above, ORS 757.365 requires the implementation and administration of the Oregon Solar Incentive Program. The statute also provides that prudently incurred costs associated with compliance with the statute are recoverable in rates. Moreover, the renewable energy certificates associated with generation sold to the utility under ORS 757.365 may be used to comply with the Oregon RPS, which also requires cost recovery of prudently incurred costs associated with compliance.<sup>7</sup> Costs associated with compliance with ORS 757.365 are not currently included in rates. Accordingly, reauthorization of the deferral application is necessary to allow for recovery of the costs as contemplated by ORS 757.365(10) and ORS 469A.120(1). Reauthorization of deferred accounting will allow PacifiCorp to continue to match the benefits that customers will be receiving with the costs to the company of providing those benefits.

**C. Proposed Accounting.**

During the period of deferral, PacifiCorp proposes to account for the deferred costs of the Oregon Solar Incentive Program by recording the deferral in Account 182.3, Other Regulatory Assets. In the absence of the Commission’s approval of this Application, PacifiCorp would not incur the cost for the program. Were such costs incurred, however, they would be recorded in Account 908, Customer Assistance Expenses.

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<sup>7</sup> ORS 469A.120(1).

**D. Estimate of Amounts.**

Costs and expenses of the Oregon Solar Incentive Program include the payment of volumetric incentive rates and program administration costs to implement and administer the program. Attachment 2 to PacifiCorp's Advice No. 10-022<sup>8</sup> contains a description of the types of incremental costs, by cost category, to be included in the deferral. PacifiCorp estimates that the costs may range from \$4.5 million to \$4.9 million during the May 19, 2020 through May 18, 2021 deferral period. Changes in the incentive rate established by the Commission, as well as differences between actual and projected generation due to weather conditions, may impact this estimate.

**E. Notice.**

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


**IV. CONCLUSION**

Continued deferral of the costs described in this Application is necessary to allow recovery of prudently incurred costs associated with compliance with ORS 757.365 and the Oregon RPS. PacifiCorp's Application is appropriate under the applicable statutes and meets the requirements of OAR 860-027-0300. PacifiCorp respectfully requests that the Commission reauthorize PacifiCorp to defer costs associated with compliance with ORS 757.365(10), ORS 469A.120(1) and (3), or ORS 757.259.

Respectfully submitted this 15<sup>th</sup> day of May, 2020.

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<sup>8</sup> Advice No. 10-022 approved in Commission Public Meeting on December 28, 2010 effective with service rendered on and after January 1, 2011.

By:   
Matthew D. McVee  
Chief Regulatory Counsel  
PacifiCorp d/b/a Pacific Power

## **EXHIBIT A**



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1483(10)**

In the Matter of  
PACIFICORP d/b/a PACIFIC POWER  
Application for Reauthorization for  
Deferred Accounting

**APPLICATION FOR  
REAUTHORIZATION FOR  
DEFERRED ACCOUNTING**

On May 15, 2020, PacifiCorp d/b/a Pacific Power filed an application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing the use of deferred accounting for expenses associated with a photovoltaic pilot program required by ORS 757.365 the 12-month period beginning May 19, 2020.

PacifiCorp proposes to continue to defer the costs and expenses associated with the implementation of a solar feed-in tariff. Though difficult to estimate at this time, the Company has estimated that the annual deferral amounts may range from \$4.5 million to \$4.9 million during this deferral period. PacifiCorp requests that the deferral continue no longer than 12 months from the date of this filing.


The granting the reauthorization will not authorize a change in rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

Interested persons may obtain a copy of the application by contacting:

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

Any person may submit to the Commission written comment on the application, in accordance with the procedures prescribed by the Commission. The deadline for comments on the application is 25 days from the filing of the application.

Respectfully submitted on May 15, 2020.

By:   
Matthew D. McVee  
Chief Regulatory Counsel  
PacifiCorp d/b/a Pacific Power

## CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Notice of Application on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

UM 1483

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Dated this 15<sup>th</sup> of May, 2020.



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Katie Savarin  
Coordinator, Regulatory Operations