

March 23, 2021

VIA ELECTRONIC FILING

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

RE: UM 1964(3)—PacifiCorp's Application for Reauthorization of Deferred Accounting for a Balancing Account Related to PacifiCorp's Transportation Electrification Program

PacifiCorp d/b/a Pacific Power submits for filing its Application for Reauthorization of Deferred Accounting for a Balancing Account Related to PacifiCorp's Transportation Electrification Program.

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

Matthew McVee
Chief Regulatory Counsel
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
matthew.mcvee@pacificorp.com

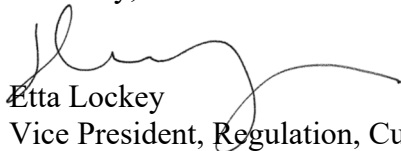
Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com

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

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

Sincerely,


Etta Lockey
Vice President, Regulation, Customer and Community Solutions

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1964(3)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred Accounting
for a Balancing Account Related to PacifiCorp's
Transportation Electrification Program.

**APPLICATION FOR
REAUTHORIZATION OF
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 and continue the deferral of program costs and revenues related to PacifiCorp's Transportation Electrification Program (TE Program).¹ PacifiCorp previously submitted an application for deferral and request for a balancing account in UM 1964 on July 27, 2018, and originally filed for reauthorization on March 24, 2020, and amended on April 22, 2020. The Commission has not yet acted on these filings. PacifiCorp submits this request for reauthorization of deferred accounting for its TE Program for 12 months beginning March 24, 2021.

II. CONTACT INFORMATION

Communications regarding this application should be addressed to:

¹ *In the Matter of PacifiCorp dba Pacific Power Application for Transportation Electrification Programs*, Docket No. UM 1810, Order No. 18-075 (Feb. 27, 2018).

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

Matthew McVee
Chief Regulatory Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: matthew.mcvee@pacificorp.com

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

By email (preferred): 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) 813-5934.

III. BACKGROUND

In compliance with OAR 860-087-0030, PacifiCorp filed an application proposing approval of programs to accelerate transportation electrification on December 27, 2016.² PacifiCorp's TE Program is comprised of three pilot programs: the Public Charging Pilot, the Outreach and Education Pilot and the Demonstration and Development Pilot. In its application, PacifiCorp proposed cost recovery of the TE Program through Schedule 95, Pilot Program Cost Adjustment, along with the use of a balancing account to track actual costs and revenue collections. The Company's proposed TE Program application was approved by the Commission in Order No. 18-075.

On July 27, 2018, PacifiCorp filed an application for approval of the deferred accounting necessary to establish a balancing account to enable the use of a cost-of-service

² *Id* at 2.

automatic adjustment clause. On March 24, 2020, the Company filed an application for reauthorization for deferred accounting for 12 months beginning March 24, 2020. On April 22, 2020, the Company filed an amended application for reauthorization for deferred accounting. PacifiCorp's requests are currently pending before the Commission.

PacifiCorp is submitting this request for reauthorization to obtain approval for the deferred accounting necessary to establish a balancing account to enable the use of a cost-of-service automatic adjustment clause.

IV. DEFERRAL OF COSTS

PacifiCorp respectfully requests reauthorization under ORS 757.259(2)(e) to establish and maintain a balancing account to record costs and credits related to the Company's TE Program, along with related interest at the Modified Blended Treasury Rate, consistent with the treatment of interest rates described in Order No. 08-263 as modified by Order No. 10-279.

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

A. Description of Utility Expense

PacifiCorp proposes to continue maintaining a balancing account to record the costs related to its TE Program, the collection of cost recovery through Schedule 95, the collection of revenues from public charging stations established under the TE Program, the receipt of monetized credits from the Oregon Clean Fuels Program, and related interest. The use of a cost-of-service automatic adjustment clause and balancing account will ensure that PacifiCorp's TE Program cost recovery under Schedule 95 will not under- or over-collect amounts related to the TE Program.

As agreed to by stipulating parties and approved by the Commission in docket UM 1810, Order No. 18-075, as modified by Order No. 19-087, the budget is capped at \$4.64 million during the three-year pilot period.

As outlined below, PacifiCorp has incurred the following costs through 2020 and anticipates the following costs will be incurred in 2021.

Oregon Transportation Electrification Pilots to date					
	2018	2019	2020	2021*	Total
Public Charging Pilot – capital spend	\$67,986.90	\$730,638.74	\$905,974.19	\$330,000.00	\$2,034,599.83
Public Charging Pilot – operation and maintenance (O&M)	\$1,926.43	\$132,579.98	\$107,414.41	\$60,400.00	\$302,320.82
Outreach & Education Pilot – capital spend					\$ -
Outreach & Education Pilot – O&M	\$4,715.80	\$390,768.90	\$199,882.53	\$419,632.77	\$1,015,000.00
Demonstration & Development Pilot – capital spend					\$ -
Demonstration & Development Pilot – O&M	\$8,666.39	\$215,471.05	\$584,276.67	\$876,585.89	\$1,685,000.00
Other [a] – capital spend					\$ -
Other [a] – O&M	\$33,305.22	\$18,840.63	\$14,710.75	\$10,200.00	\$77,056.60
Total	\$116,600.74	\$1,488,299.30	\$1,812,258.55	\$1,696,818.66	\$5,113,977.25

[a] Other includes costs for the attribution model/cost effectiveness framework and a pilot study of system impacts

* 2021 is forecasted all other years are actual

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 fluctuation of rate levels or to match appropriately the costs borne and received by customers. In this application PacifiCorp seeks the use of a balancing account to match the costs borne and benefits received by customers.

C. Proposed Accounting

If this application is approved, PacifiCorp will record deferred TE Program expense amounts by crediting FERC account 906, Customer Service and Informational Expenses, and debiting the TE Program balancing account, in FERC Account 182.3, Other Regulatory Assets. The deferral balance will be reduced monthly by the amount collected under Schedule 95 recovering TE Program costs. In addition, revenues from public charging stations and monetized credits from the Oregon Clean Fuels Program related to the TE Program will be credited to the proposed TE Program balancing account. A carrying charge calculated at the current Modified Blended Treasury rate will be recorded each month on the deferral balance. If this application is denied, the cost of the TE Program will remain in FERC account 906 and the revenues from public charging stations and monetized credits from the Oregon Clean Fuels Program related to the TE Program will be recorded in FERC account 456, Other Electric Revenues.

D. Estimate of Amounts

Please refer to the description of costs in Section A above.

PacifiCorp will file an advice letter for approval to recover the costs associated with the TE Program through Schedule 95, Pilot Program Cost Adjustment. The tariff advice filing will note that the rate schedule will operate as a cost-of-service automatic adjustment clause, to allow for adjustments to rates based on actual over- or under- collected amounts. The proposed rates will be designed to collect initial TE Program costs over a 12-month period. As mentioned above, deferred costs associated with the TE Program will be recorded in the proposed balancing account and will be offset monthly by the amount collected for the TE Program through Schedule 95 along with interest calculated at the Modified Blended Treasury Rate. In addition, revenues collected from the TE Program public charging stations

and monetized credits from the Oregon Clean Fuel Program will be credited to the proposed balancing account. 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. OAR 860-027-0300(4) REQUIREMENTS

A. Entries in the Deferred Account to Date

A description and explanation of the entries in this deferred account is provided in the Description of Utility Expense section.

B. Reason for Continuation of Deferred Accounting

As discussed in this application, continuation of this deferral is necessary to track the ongoing costs and revenues related to PacifiCorp's TE Program.

VI. CONCLUSION

PacifiCorp respectfully requests that, in accordance with ORS 757.259(2)(e), the Commission reauthorize the company to establish and maintain a balancing account related to PacifiCorp's TE Program to record costs, amortization through Schedule 95, charging station revenues, Oregon Clean Fuel Program credits and interest.

Respectfully submitted this 23rd day of March, 2021.


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

EXHIBIT A

EXHIBIT A
NOTICE
BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1964(3)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Reauthorization of Deferred
Accounting Related to PacifiCorp's Transportation
Electrification Program.

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

On March 23, 2021, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) filed an application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing the Company to establish and maintain a balancing account to record the deferral of program costs and revenues related to PacifiCorp's Transportation Electrification Programs. 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

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 23, 2021.

By:



Matthew D. McVee
Chief Regulatory Counsel

CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of PacifiCorp's **Notice of Application for Reauthorization of Deferred Accounting for a Balancing Account Related to PacifiCorp's Transportation Electrification Program** 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 wehrlich@tesla.com	STEVE ELZINGA (C) CHARGEPOINT INC 693 CHEMEKETA ST NE SALEM OR 97301 steve@shermmlaw.com
FRANCESCA WAHL (C) (HC) TESLA 6800 DUMBARTON CIRCLE FREMONT CA 94555 fwahl@tesla.com	LLOYD REED (C) (HC) REED CONSULTING 10025 HEATHERWOOD LANE HIGHLANDS RANCH CO 80126 lloyd.reed@lloydreedconsulting.com
CRYTAL RIVERA (C) (HC) SOMACH SIMMONS & DUNN 500 CAPITOL MALL STE 1000 SACRAMENTO CA 95814 crivera@somachlaw.com	
AWEC	
TYLER C PEPPLER (C) (HC) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com	BRENT COLEMAN (C) (HC) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 blc@dvclaw.com
CALPINE SOLUTIONS	
GREGORY M. ADAMS (C) RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE ID 83702 greg@richardsonadams.com	GREG BASS CALPINE ENERGY SOLUTIONS, LLC 401 WEST A ST, STE 500 SAN DIEGO CA 92101 greg.bass@calpinesolutions.com
KEVIN HIGGINS (C) ENERGY STRATEGIES LLC 215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com	

CHARGEPOINT	
ALEXANDRA LEUMER (C) CHARGEPOINT alexandra.leumer@chargepoint.com	SCOTT DUNBAR (C) KEYES FOX & WIEDMAN LLP 1580 LINCOLN ST, STE 880 DENVER CO 80203 sdunbar@kfwlaw.com
OREGON CITIZENS UTILITY BOARD	
OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 dockets@oregoncub.org	MICHAEL GOETZ (C) (HC) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 mike@oregoncub.org
ROBERT JENKS (C) (HC) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 bob@oregoncub.org	
FRED MEYER	
JUSTIN BIEBER (C) FRED MEYER/ENERGY STRATEGIES LLC 215 SOUTH STATE STREET, STE 200 SALT LAKE CITY UT 84111 jbieber@energystrat.com	KURT J BOEHM (C) BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com
JODY KYLER COHN (C) BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI OH 45202 jkylercohn@bkllawfirm.com	
KWUA	
PAUL S SIMMONS (C) (HC) SOMACH SIMMONS & DUNN, PC 500 CAPITOL MALL, STE 1000 SACRAMENTO CA 95814 psimmons@somachlaw.com	
PACIFICORP	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com	MATTHEW MCVEE (C) PACIFICORP 825 NE MULTNOMAH ST STE 2000 PORTLAND, OR 97232 matthew.mcvee@pacificorp.com

<p>ETTA LOCKEY (C) PACIFIC POWER 825 NE MULTNOMAH ST., STE 2000 PORTLAND OR 97232 etta.lockey@pacificorp.com</p>	
SBUA	
<p>WILLIAM STEELE (C) BILL STEELE AND ASSOCIATES, LLC PO BOX 631151 HIGHLANDS RANCH CO 80164 wa.steele@hotmail.com</p>	<p>DIANE HENKELS (C) SMALL BUSINESS UTILITY ADVOCATES 621 SW MORRISON ST. STE 1025 PORTLAND OR 97205 diane@utilityadvocates.org</p>
SIERRA CLUB	
<p>ANA BOYD (C) (HC) SIERRA CLUB 2101 WEBSTER ST STE 1300 OAKLAND CA 94612 ana.boyd@sierraclub.org</p>	<p>GLORIA D SMITH (C) (HC) SIERRA CLUB LAW PROGRAM 2101 WEBSTER ST STE 1300 OAKLAND CA 94612 gloria.smith@sierraclub.org</p>
<p>CHRISTOPHER M BZDOK (C) (HC) OLSON BZDOK & HOWARD 420 EAST FRONT ST TRAVERSE CITY MI 49686 chris@envlaw.com</p>	
STAFF	
<p>MARIANNE GARDNER (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308-1088 marianne.gardner@state.or.us</p>	<p>SOMMER MOSER (C) PUC STAFF - DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM, OR 97301 sommer.moser@doj.state.or.us</p>
TESLA INC	
<p>KEVIN AUERBACHER (C) (HC) TESLA, INC. 601 13TH ST NW, 9TH FL NORTH WASHINGTON DC 20005 kauerbacher@tesla.com</p>	<p>JOHN DUNBAR (C) (HC) DUNBAR LAW LLC 621 SW MORRISON STREET STE 1025 PORTLAND OR 97205 jdunbar@dunbarlawllc.com</p>
VITESSE LLC	
<p>R BRYCE DALLEY (C) FACEBOOK INC 2400 S BERTSINGER RD RIDGEFIELD WA 98642 rbd@fb.com</p>	<p>LIZ FERRELL (C) FACEBOOK, INC. 1 HACKER WAY MENLO PARK CA 94205 eferrell@fb.com</p>

IRION A SANGER (C) SANGER LAW PC 1041 SE 58TH PLACE PORTLAND OR 97215 irion@sanger-law.com	
WALMART	
VICKI M BALDWIN (C) PARSONS BEHLE & LATIMER 201 S MAIN ST STE 1800 SALT LAKE CITY UT 84111 vbaldwin@parsonsbehle.com	STEVE W CHRISS (C) WAL-MART STORES, INC. 2001 SE 10TH ST BENTONVILLE AR 72716-0550 stephen.chriss@wal-mart.com

Dated this 23rd day of March, 2021.



Katie Savarin
Coordinator, Regulatory Operations