

January 27, 2022

VIA ELECTRONIC MAIL

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

RE: UM 1964(2)–Errata of PacifiCorp’s Application for Approval of Deferred Accounting for a Balancing Account Related to PacifiCorp’s Transportation Electrification Program

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) hereby submits an errata filing to the Application for Approval of Deferred Accounting for a Balancing Account Related to PacifiCorp’s Transportation Electrification Program (Application). Included in this filing is a clean and redline version of the Application reflecting the changes described in more detail below.

On July 18, 2018, PacifiCorp filed the Application requesting approval of deferred accounting related to its Transportation Electrification (TE) Program. On April 22, 2020, the PacifiCorp filed a request for reauthorization to establish and maintain a balancing account related to PacifiCorp’s TE Program to record costs, amortization, charging station revenues, Oregon Clean Fuel Program credits and interest (2020 Reauthorization). PacifiCorp has identified two corrections in its 2020 Reauthorization. First, the Company has identified an inadvertent error regarding the identified interest rate to compute the carrying charge. Specifically, the Application incorrectly identified the modified blended treasury rate instead of the currently authorized rate of return, which is consistent with the treatment of interest rates described in Order No. 08-263 as modified by Order No. 10-279. In the errata, the Company corrects this error by removing references to “the modified blended treasury rate.”

Second, the Application stated that funding of the Company’s TE Program would occur through Schedule 95. However, since the filing of the Application, Schedule 95 was canceled in Advice Letter 21-022 and the TE Program will now be funded through Schedule 291, Systems Benefits Charge. In the errata, the Company replaces references to “Schedule 95” with “Schedule 291.”

UM 1964(2)
Public Utility Commission of Oregon
January 27, 2022

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

Sincerely,

A handwritten signature in blue ink that reads "Shelley McCoy". The signature is written in a cursive, flowing style.

Shelley E. McCoy
Director, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1964(2)

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.

**AMENDED 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) submits this amended application to 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 Program (TE Program). PacifiCorp proposes to record in the balancing account the costs associated with the TE Program as described in the company's application filed per OAR 860-087-0030 and approved by the Commission in Order No. 18-075 in docket UM 1810.¹ In addition, PacifiCorp will record in the balancing account the revenue collected from a tariff rider recovering the cost of the TE Program, and the revenue and credits from charging stations and the Oregon Clean Fuels Program related to the TE Program. 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. The Commission has not yet acted on either filing.

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).

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

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. The company's proposed TE Program application was approved by the Commission in Order No. 18-075. In its application, PacifiCorp proposed cost recovery of the TE Program through

² *Id* at 2.

Schedule 95³, Pilot Program Cost Adjustment, along with the use of a balancing account to track actual costs and revenue collections.

PacifiCorp will be filing a tariff advice to implement cost recovery of the TE Program through Schedule ~~291~~⁹⁵, ~~System Benefits Charge~~~~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 company filed a deferral application 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 on July 27, 2018. PacifiCorp sought reauthorization of the deferral in its filing on March 24, 2020. PacifiCorp is submitting this amended request for reauthorization of the deferral application 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:

³ Since the TE Program was approved, Schedule 95 was canceled in Advice Letter 21-022 and the program that was funded through Schedule 95 is now funded through Schedule 291, System Benefits Charge.

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 29195, 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 29195 will not under- or over-collect amounts related to the TE Program.

The following costs related to the TE Program were agreed to by stipulating parties and approved by the Commission in UM 1810.

**PacifiCorp TE Program – Total Budget
(\$000s)**

	2017	2018	2019	Total
Public Charging Pilot	\$50.0	\$780.0	\$1,020.0	\$1,850.0
Outreach & Education Pilot	\$177.5	\$330.0	\$330.0	\$837.5
Demonstration & Development Pilot	\$295.0	\$695.0	\$695.0	\$1,685.0
Other [a]	\$57.5	\$105.0	\$105.0	\$267.5
Total	\$580.0	\$1,910.0	\$2,150.0	\$4,640.0

[a] Other includes costs for the attribution model/cost effectiveness framework and a pilot study of system impacts of residential electric vehicles. See Order No. 18-075, Appendix A at 6.

PacifiCorp notes that the Public Charging Pilot total budget includes operations and maintenance costs, along with costs related to charging station equipment and installation and program administration that will be classified as capital expenses.⁴

PacifiCorp notes that at the time of the TE Program application, these costs were anticipated to occur from fourth quarter of 2017 through the end of 2019. Due to a longer than expected procedural schedule in UM 1810, these costs began to occur in mid-2018. As

⁴ Order No. 18-075, Appendix A at 2.

outlined below, PacifiCorp has incurred the following costs through 2019 and anticipates the following costs will be incurred in 2020.

Oregon Transportation Electrification Pilots to date				
	2018	2019	2020	Total
Public Charging Pilot – capital spend	\$ 67,986.90	\$ 730,638.74	\$ 258,908.75	\$ 1,057,534.39
Public Charging Pilot – O&M	\$ 1,926.43	\$132,579.98	\$ 1,612.91	\$ 136,119.32
Outreach & Education Pilot – capital spend				\$ -
Outreach & Education Pilot – O&M	\$ 4,715.80	\$ 390,768.90	\$ 4,950.05	\$ 400,434.75
Demonstration & Development Pilot – capital spend				\$ -
Demonstration & Development Pilot – O&M	\$ 8,666.39	\$ 215,471.05	\$ 20,833.26	\$ 244,970.70
Other [a] – capital spend				\$ -
Other [a] – O&M	\$ 33,305.22	\$ 18,840.63	\$ -	\$ 52,145.85
Total	\$ 116,600.74	\$ 1,488,299.30	\$ 286,304.97	\$ 1,891,205.01

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

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 ~~29195~~ 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 Company's current ~~Modified Blended Treasury~~authorized rate of return 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 ~~29195, System Benefits Charge~~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 ~~29195~~ 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

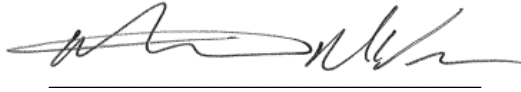
A copy of the Notice of Application and a list of persons served with the notice are attached as Exhibit A to this application.

V. 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 ~~29195~~, charging station revenues, Oregon Clean Fuel Program credits and interest.

Respectfully submitted this 22nd day of April, 2020.

By:



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

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OF OREGON**

UM 1964(2)

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Schedule 95³, Pilot Program Cost Adjustment, along with the use of a balancing account to track actual costs and revenue collections.

PacifiCorp will be filing a tariff advice to implement cost recovery of the TE Program through Schedule 291, System Benefits Charge. 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 company filed a deferral application 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 on July 27, 2018. PacifiCorp sought reauthorization of the deferral in its filing on March 24, 2020. PacifiCorp is submitting this amended request for reauthorization of the deferral application 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.

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E. Notice


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Respectfully submitted this 22nd day of April, 2020.

By:



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