

March 23, 2022

***VIA ELECTRONIC FILING***

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

**RE: UM 1964(4)—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](mailto:oregondockets@pacificorp.com)

Carla Scarsella  
Deputy General Counsel  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[carla.scarsella@pacificorp.com](mailto:carla.scarsella@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 Jennifer Angell, Regulatory Project Manager, at (503) 331-4414.

Sincerely,

  
Shelley McCoy  
Director, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1964(4)**

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).<sup>1</sup> PacifiCorp previously submitted an application for deferral and request for a balancing account in UM 1964 on July 27, 2018,<sup>2</sup> and filed for reauthorization on March 24, 2020,<sup>3</sup> and March 23, 2021.<sup>4</sup> On March 22, 2022, PacifiCorp filed a motion to consolidate these previously filed deferral applications with the Company's recent general rate case, docket UE 399. PacifiCorp submits this request for

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

<sup>2</sup> On January 27, 2022, PacifiCorp filed an errata to correct the interest rates used to compute the carrying charge and replaced the reference to Schedule 95 to Schedule 291.

<sup>3</sup> On April 22, 2020, an amended application was filed. On January 27, 2022, PacifiCorp filed an errata to correct the interest rates used to compute the carrying charge and replaced the reference to Schedule 95 to Schedule 291.

<sup>4</sup> On January 27, 2022, PacifiCorp filed an errata to correct the interest rates used to compute the carrying charge and replaced the reference to Schedule 95 to Schedule 291.

reauthorization of deferred accounting for its TE Program for 12 months beginning March 24, 2022.

## II. CONTACT INFORMATION

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)

Carla Scarsella  
Deputy General Counsel  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
Email: [carla.scarsella@pacificorp.com](mailto:carla.scarsella@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 Jennifer Angell, Regulatory Project Manager, at (503) 331-4414.

## 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.<sup>5</sup> 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<sup>6</sup>,

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<sup>5</sup> *Id* at 2.

<sup>6</sup> 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.

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 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. On March 23, 2021, the Company filed an application for reauthorization for deferred accounting for 12 months beginning March 24, 2021. On January 27, 2022, the Company filed errata to the March 24, 2020 and March 24, 2021 applications to correct the interest rate to compute the carrying charge and to reflect that funding of the TE Program would occur through Schedule 291. On March 22, 2022, PacifiCorp filed a motion to consolidate these previously filed deferral applications in this docket with the Company's recent general rate case, docket UE 399.

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 consistent with the treatment of interest rates described in Order No. 08-263 as modified by Order No. 10-279.

#### **IV. OAR 860-027-0300(3) REQUIREMENTS**

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

#### **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 291, 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. In docket UE 399, PacifiCorp's recently filed general rate case, the Company has proposed amortizing the amounts accrued through December 31, 2021. Amounts incurred in 2022 and thereafter will be recovered through Schedule 291.

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.

Through December 31, 2021, PacifiCorp has deferred \$2,600,000 (including interest) for program-related activity including public charging capital spend and operations and maintenance offset by charging station revenue, outreach and education capital spend and operations and maintenance, demonstration capital spend and operations and maintenance and other miscellaneous costs. PacifiCorp expects to defer approximately \$65,000 in 2022.

#### **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 291 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 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.

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 291 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 291, charging station revenues, Oregon Clean Fuel Program credits and interest.

Respectfully submitted this 23<sup>rd</sup> day of March, 2022.

By:   
Carla Scarsella  
Deputy General Counsel  
PacifiCorp d/b/a Pacific Power

## **Exhibit A**



**EXHIBIT A**  
**NOTICE**  
**BEFORE THE PUBLIC UTILITY COMMISSION**  
**OF OREGON**  
**UM 1964(4)**

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, 2022, 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](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 23, 2022.

By:



Carla Scarsella  
Deputy General Counsel

## CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of PacifiCorp's **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

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<b>STAFF</b>	
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VICKI M BALDWIN (C) PARSONS BEHLE & LATIMER 201 S MAIN ST STE 1800 SALT LAKE CITY UT 84111 <a href="mailto:vbaldwin@parsonsbehle.com">vbaldwin@parsonsbehle.com</a>	STEVE W CHRISS (C) WAL-MART STORES, INC. 2001 SE 10TH ST BENTONVILLE AR 72716-0550 <a href="mailto:stephen.chriss@wal-mart.com">stephen.chriss@wal-mart.com</a>

Dated this 23<sup>rd</sup> day of March, 2022.




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Mary Penfield  
Adviser, Regulatory Operations

## CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of PacifiCorp's **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 399

<b>PACIFICORP</b>	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 <a href="mailto:oregondockets@pacificorp.com">oregondockets@pacificorp.com</a>	AJAY KUMAR (C) (HC) PACIFICORP 825 NE MULTNOMAH ST STE 2000 PORTLAND, OR 97232 <a href="mailto:ajay.kumar@pacificorp.com">ajay.kumar@pacificorp.com</a>
<b>STAFF</b>	
MATTHEW MULDOON (C) (HC) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM OR 97308 <a href="mailto:matt.muldoon@state.or.us">matt.muldoon@state.or.us</a>	SOMMER MOSER (C) (HC) PUC STAFF - DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM, OR 97301 <a href="mailto:sommer.moser@doj.state.or.us">sommer.moser@doj.state.or.us</a>
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Dated this 23<sup>rd</sup> day of March, 2022.

A handwritten signature in black ink, appearing to read 'Mary Penfield', written over a light blue rectangular background.

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Mary Penfield  
Adviser, Regulatory Operations