

December 14, 2023

VIA ELECTRONIC FILING

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

Re: UM 2224(2)—PacifiCorp’s Application for Reauthorization of Deferred Accounting for Costs and Revenues Associated with the Transportation Electrification Charge in House Bill 2165

PacifiCorp d/b/a Pacific Power submits for filing its Application for Reauthorization of Deferred Accounting for Costs and Revenues Associated with the Transportation Electrification Charge in House Bill 2165.

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

Carla Scarsella
Deputy General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: carla.scarsella@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 Street, Suite 2000
Portland, OR 97232

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

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2224(2)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred
Accounting for Costs and Revenues Associated
with the Transportation Electrification Charge
in House Bill 2165

**APPLICATION FOR
REAUTHORIZATION OF DEFERRED
ACCOUNTING**

I. INTRODUCTION

In accordance with Oregon Revised Statutes (ORS) 757.259(2)(e) and Oregon Administrative Rule (OAR) 860-027-0300, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits this application to the Public Utility Commission of Oregon (Commission) for an order reauthorizing deferred accounting to track the costs and revenues associated with the Transportation Electrification (TE) charge established by House Bill (HB) 2165 (TE Charge Costs) for the 12 months beginning January 7, 2024. The TE charge was approved by the Commission effective January 1, 2022, and is collected through the System Benefits Charge, Schedule 291.¹

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

Carla Scarsella
Deputy General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: carla.scarsella@pacificorp.com

¹ See PacifiCorp Advice Letter 21-022 filed November 15, 2021, effective January 1, 2022.

In addition, the Company 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, Regulatory Affairs Manager, at (503) 813-5934.

III. BACKGROUND

In May 2021, the Governor of Oregon signed into law HB 2165. Section 2 (2) of the bill states:

An electric company that makes sales of electricity to 25,000 or more retail electricity consumers in this state shall collect, through monthly meter charges, an amount from each retail electricity consumer served through the distribution system owned and operated by the electric company, regardless of whether the retail electricity consumer purchases the electricity from the electric company. The total amounts collected under this section must be set to one quarter of one percent of the total revenues collected by the electric company from all retail electricity consumers.

The law went into effect on January 1, 2022. On November 15, 2021, PacifiCorp filed Advice Letter 21-022 to begin collecting the TE charge through the System Benefits Charge, Schedule 291, effective January 1, 2022. The Commission approved the Company's filing on December 28, 2021.

On January 7, 2022, PacifiCorp filed an application requesting authorization to defer the TE Charge Costs for the 12-month period beginning January 7, 2022. The Commission approved the application on June 2, 2022, in Order No. 22-199.

On January 6, 2023, PacifiCorp filed an application requesting authorization to defer the TE Charge Costs for the 12-month period beginning January 7, 2023. The Commission approved the application on August 9, 2023, in Order No. 23-288.

IV. DEFERRAL OF COSTS

In this application, PacifiCorp requests reauthorization to continue deferral of the TE Charge Costs for the 12-month period beginning on January 7, 2024. As required by OAR 860-027-0300(3) and (4), PacifiCorp provides the following:

A. Description of Utility Expense

HB 2165 Section 2 requires that the total amounts collected under this law be set to one quarter of one percent of the total revenues collected by the electric company from all retail electricity consumers. Section 3 requires that the funds collected must be expended by the electric company to support and integrate TE and must be consistent with a budget approved by the Commission. Section 3 also requires that expenditures made by an electric company must be made on elements contained within the electric company's TE plan² accepted by the Commission pursuant to ORS 757.357.

B. Reasons for Deferral

As discussed above, PacifiCorp requests reauthorization to defer certain costs and revenues associated with implementing and administering the TE charge required by HB 2165. ORS 757.259(2)(e) allows the deferral of identifiable utility expenses in order to minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately the costs borne and benefits received by customers. Commission approval of PacifiCorp's application will support the continued use of an automatic adjustment clause

² The Commission approved PacifiCorp's final 2023 TE Plan. *See, In the Matter of PacifiCorp, dba Pacific Power, Oregon Transportation Electrification Plan*, Docket No. UM 2056, Order No. 23-257 (July 13, 2023).

and associated balancing account to track the costs and revenues from the program separate from PacifiCorp's other costs and revenues. Granting this application will minimize the frequency of rate changes and match appropriately the costs borne by, and benefits received by customers.

PacifiCorp's application is consistent with the Commission's previous approval of deferred accounting applications.

C. Proposed Accounting

If this application is approved, PacifiCorp proposes to record deferred amounts to Federal Energy Regulatory Commission account 182.3, Other Regulatory Assets. This account will accrue interest at the Commission-authorized rate for deferred accounts.

D. Estimate of Amounts

HB 2165 provides that the funding for transportation electrification programs will be one quarter of one percent of revenues. Schedule 291 is designed to collect approximately \$3.2 million annually for the TE charge.³

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.

F. Entries in the Deferred Account to Date

Exhibit B of the Application provides the entries in the deferred account to date.

³ Current rate approved in Advice No. 21-022/ADV 1344. PacifiCorp did not adjust the amount collected for the TE charge when it filed to update the rate for Schedule 291 in Advice No. 23-004.


G. Reason for Continuation of Deferred Accounting

As discussed in this application, continuation of this deferral is necessary to track certain costs and revenues associated with implementing and administering the TE charge required by HB 2165.

V. CONCLUSION

For the reasons set forth above, in accordance with ORS 757.259(2)(e), PacifiCorp respectfully requests reauthorization for a deferred account for 12 months beginning on January 7, 2024, to track the TE Charge Costs.

Respectfully submitted this 14th day of December 2023.

By: 
Carla Scarsella
Deputy General Counsel

Attorney for PacifiCorp d/b/a Pacific Power

Exhibit A

Notice of Application

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2224(2)**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred
Accounting for Costs and Revenues Associated
with the Transportation Electrification Charge
in House Bill 2165


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

On December 14, 2023, PacifiCorp d/b/a Pacific Power filed an application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing deferred accounting to track the costs and revenues associated with the Transportation Electrification charge established by House Bill 2165. 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. To obtain a copy of the application, contact the following:

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

Any person may submit written comments to the Commission regarding the application within 25 days of the date of this filing.

Respectfully submitted on December 14, 2023.

By: 
Carla Scarsella
Deputy General Counsel

CERTIFICATE OF SERVICE

I certify that a true and correct copy of **PacifiCorp's Notice of Application for Reauthorization of Deferred Accounting** was served on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

Service List UE 399

PACIFICORP	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com	KATHERINE A MCDOWELL (C) MCDOWELL RACKNER & GIBSON PC 419 SW 11TH AVE., SUITE 400 PORTLAND, OR 97205 katherine@mrg-law.com
CARLA SCARSELLA (C) PACIFICORP 825 NE MULTNOMAH ST STE 2000 PORTLAND, OR 97232 carla.scarsella@pacificorp.com	
STAFF	
JOHANNA RIEMENSCHNEIDER (C) PUC STAFF - DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM, OR 97301-4796 johanna.riemenschneider@doj.state.or.us	MATTHEW MULDOON (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308 matt.muldoon@state.or.us
AWEC	
BRENT COLEMAN (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY, SUITE 450 PORTLAND, OR 97201 blc@dvclaw.com	JESSE O GORSUCH (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND, OR 97201 jog@dvclaw.com
TYLER C PEPPLER (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND, OR 97201 tcp@dvclaw.com	

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CUB	
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OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@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	
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MARIE P BARLOW NEWSUN ENERGY LLC 390 SW COLUMBIA ST STE 120 BEND OR 97702 mbarlow@newsunenergy.net	
NIPPC	
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OREGON FARM BUREAU	
PAUL S SIMMONS (C) OREGON FARM BUREAU FEDERATION 550 CAPITOL MALL STE 1000 SACREAMENTO, CA 95814 psimmons@somachlaw.com	
SBUA	
GRANT HART (C) SMALL BUSINESS UTILITY ADVOCATES grant@utilityadvocates.org	MARY ANNE COOPER (C) OREGON FARM BUREAU FEDERATION 1320 CAPITOL ST NE STE 200 SALEM, OR 97301 maryanne@oregonfb.org
WILLIAM STEELE (C) BILL STEELE AND ASSOCIATES, LLC PO BOX 631151 HIGHLANDS RANCH, CO 80164 w.steele1@icloud.com	DIANE HENKELS (C) SMALL BUSINESS UTILITY ADVOCATES 621 SW MORRISON ST. STE 1025 PORTLAND, OR 97205 diane@utilityadvocates.org

VITESSE	
DENNIS BARTLETT (C) META PLATFORMS, INC. 1 HACKER WAY MENLO PARK, CA 94025 dbart@meta.com	
IRION A SANGER (C) SANGER LAW PC 4031 SE HAWTHORNE BLVD PORTLAND, OR 97214 irion@sanger-law.com	LIZ FERRELL (C) META PLATFORMS, INC. 1 HACKER WAY MENLO PARK, CA 94025 eferrell@meta.com
WALMART	
VICKI M BALDWIN (C) PARSONS BEHLE & LATIMER 201 S MAIN ST STE 1800 SALT LAKE CITY, UT 84111 vbaldwin@parsonsbehle.com	
ALEX KRONAUER (C) WALMART alex.kronauer@walmart.com	STEVE W CHRISS (C) WAL-MART STORES, INC. 2001 SE 10TH ST BENTONVILLE, AR 72716-0550 stephen.chriss@wal-mart.com

Dated this 14th day of December, 2023.



Santiago Gutierrez
Coordinator, Regulatory Operations

Exhibit B

Actg Pd	Beg Balance	Sch 291 Collections	Spend							OR Company Owned Chargers					Sale of OR DEQ Credits	Interest	End Balance			
			OR Non Residential Charging Pilot Program	OR Residential Charging Pilot Program	OR Outreach & Education Charging Pilot Program	Stakeholder Engagement	Public Infrastructure	Program & Incentive	OR Fleet Make Ready	Nominal Revenue	Chargepoint CPI Fee	Franchise Fee	OR Public Purchase Charge	EV Cost of Charging Station						
FY 2023	1	\$ (2,248,938.29)	\$ (313,012.12)	\$ 469.50	\$ 5,622.19	\$ 128,460.79	\$ 4,790.00	\$ 7,873.75	\$ 48,320.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (13,671.06)	\$ (2,380,085.24)
	2	\$ (2,380,085.24)	\$ (299,719.60)	\$ 13,286.00	\$ 33,722.00	\$ 76,374.91	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (14,622.35)	\$ (2,571,044.28)
	3	\$ (2,571,044.28)	\$ (295,720.91)	\$ 47,154.00	\$ 56,818.34	\$ 9,514.31	\$ -	\$ 1,970.00	\$ 6,675.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (15,745.48)	\$ (2,760,379.02)
	4	\$ (2,760,379.02)	\$ (259,956.83)	\$ 25,197.00	\$ 43,229.74	\$ 25,659.59	\$ 1,890.50	\$ -	\$ 10,687.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (97,559.50)	\$ (17,095.99)	\$ (3,028,327.01)
	5	\$ (3,028,327.01)	\$ (233,247.76)	\$ 9,854.00	\$ 20,528.45	\$ 102,117.30	\$ -	\$ 1,523.55	\$ 34,238.60	\$ -	\$ (5,589.97)	\$ 391.31	\$ 391.29	\$ 83.85	\$ 623.05	\$ -	\$ -	\$ -	\$ (18,144.95)	\$ (3,115,558.29)
	6	\$ (3,115,558.29)	\$ (238,538.54)	\$ 21,655.66	\$ 38,288.33	\$ 46,889.60	\$ -	\$ -	\$ -	\$ -	\$ (5,933.74)	\$ 415.32	\$ 415.35	\$ 89.00	\$ 669.15	\$ -	\$ -	\$ -	\$ (18,860.08)	\$ (3,270,468.24)
	7	\$ (3,270,468.24)	\$ (262,639.41)	\$ 19,280.00	\$ 17,555.00	\$ 66,416.65	\$ -	\$ 1,286.55	\$ 23,184.00	\$ -	\$ (8,191.81)	\$ 573.36	\$ 573.42	\$ 122.88	\$ 888.77	\$ -	\$ -	\$ -	\$ (19,792.31)	\$ (3,431,211.13)
	8	\$ (3,431,211.13)	\$ (287,028.19)	\$ 13,459.50	\$ 24,914.00	\$ 34,468.05	\$ 8,478.50	\$ 1,026.62	\$ 21,574.45	\$ -	\$ (9,745.60)	\$ 682.27	\$ 682.19	\$ 146.19	\$ 1,081.63	\$ -	\$ -	\$ -	\$ (20,890.63)	\$ (3,642,362.16)
	9	\$ (3,642,362.16)	\$ (253,460.79)	\$ 20,087.00	\$ 56,915.99	\$ 23,417.91	\$ -	\$ 2,275.00	\$ -	\$ 2,700.00	\$ (10,220.25)	\$ 715.34	\$ 715.42	\$ 153.30	\$ 1,112.79	\$ -	\$ -	\$ -	\$ (22,038.83)	\$ (3,819,989.27)
	10	\$ (3,819,989.27)	\$ (226,408.55)	\$ 142,986.65	\$ 16,783.24	\$ 47,684.14	\$ -	\$ 2,667.12	\$ -	\$ -	\$ (8,281.38)	\$ 579.58	\$ 579.69	\$ 124.22	\$ 917.69	\$ -	\$ -	\$ -	\$ (22,696.51)	\$ (3,865,053.38)
	11	\$ (3,865,053.38)	\$ (255,390.02)	\$ 34,645.00	\$ 28,372.03	\$ 43,077.88	\$ -	\$ 26,344.89	\$ -	\$ 4,212.00	\$ (8,573.29)	\$ 600.19	\$ 600.14	\$ 128.61	\$ 946.46	\$ -	\$ -	\$ -	\$ (23,267.59)	\$ (4,013,357.08)
		YTD TOTAL	\$ (2,925,122.72)	\$ 348,074.31	\$ 342,749.31	\$ 604,081.13	\$ 15,159.00	\$ 44,967.48	\$ 144,679.55	\$ 6,912.00	\$ (56,536.04)	\$ 3,957.37	\$ 3,957.50	\$ 848.05	\$ 6,239.54	\$ (97,559.50)	\$ (206,825.77)			