

December 28, 2023

VIA ELECTRONIC FILING

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

Re: UM 2265(1)—PacifiCorp’s Application for Reauthorization of Deferred Accounting for Costs Related to the Demand Response Programs Approved in Schedule 106

PacifiCorp d/b/a Pacific Power submits for filing its Application for Reauthorization of Deferred Accounting for Costs Related to the Demand Response Programs Approved in Schedule 106.

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
Email: oregondockets@pacificorp.com

Ajay Kumar
Assistant General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: ajay.kumar@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, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2265(1)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred
Accounting for Costs Related to the Demand
Response Programs Approved in Schedule 106.

**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 the Company to maintain a balancing account to record the deferral of program costs related to demand response programs approved by the Commission under Tariff Schedule 106. PacifiCorp respectfully requests authorization for the 12 months beginning on January 1, 2024.

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

Ajay Kumar
Assistant General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: ajay.kumar@pacificorp.com

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

On December 14, 2022, PacifiCorp filed an application requesting Commission authorization to establish and maintain a balancing account for all demand response programs approved by the Commission under Schedule 106. PacifiCorp's Schedule 106 enables multiple demand response programs that are approved by the Commission, in which eligible customers can participate. These voluntary programs are part of the continuing implementation of resources identified in PacifiCorp's integrated resource plans. The following lists the demand response programs that have been approved under Schedule 106 to date.

Demand Response Program	Approved
Irrigation	May 5, 2022 (Advice 22-004 / ADV 1383)
Commercial and Industrial	November 16, 2022 (Advice 22-011 / ADV 1436)
Residential	May 16, 2023 (Advice 23-010 / ADV 1496)

For administrative efficiency and to ensure all demand response program costs approved under Schedule 106 are tracked under a single deferral, PacifiCorp proposed transferring all unamortized amounts for its irrigation pilot program previously deferred under UM 2158 through December 31, 2022, to this deferral.

The Company also confirmed that the deferred amounts associated with its demand response programs would be recovered through Schedule 291 in a future Commission

proceeding.¹ The Commission approved the Company's application on March 23, 2023, in Order No. 23-115.

IV. DEFERRAL OF COSTS

In this application, PacifiCorp respectfully requests reauthorization under ORS 757.259(2)(e) to continue deferral of program costs related to demand response programs approved by the Commission under Schedule 106 for the 12-month period beginning January 1, 2024. As required by OAR 860-027-0300(3) and (4), PacifiCorp provides the following:

A. Description of Utility Expense

PacifiCorp respectfully requests authorization under ORS 757.259(2)(e) to establish and maintain a balancing account to record costs and revenues associated with implementing demand response programs approved by the Commission under Schedule 106. PacifiCorp anticipates that it will incur costs associated with the irrigation, commercial and industrial, and other demand response programs that may be approved by the Commission under Schedule 106. These costs will include vendor costs, customer incentives, customer outreach/advertising, evaluation, measurement and verification, and utility staffing directly attributable to managing these programs.

B. Reasons for Deferral

ORS 757.259(2)(e) allows the deferral of utility expenses or revenues where necessary to match appropriately the costs borne by and benefits received by customers. This request seeks to track the costs associated with its demand response programs for recovery through Schedule 291 in a future Commission proceeding.

¹ In advice filing 22-004 and 22-001, the Company indicated its intent to utilize Schedule 291 (System Benefit Charge) for the recovery of costs associated with both the Irrigation and Commercial and Industrial demand response programs.

C. Proposed Accounting

If this application is approved, PacifiCorp would continue 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

The following table provides an estimate of the costs that will be deferred under the deferral requested in this application through 2026. As noted in the original request for authorization of this deferral account, this table includes all irrigation demand response program costs previously tracked under the UM 2158 deferral.

Program	2021*	2022**	2023	2024	2025	2026	Totals
Irrigation Pilot	\$302,869	\$81,785					\$384,654
Irrigation		\$276,035	\$610,042	\$3,152,477	\$2,856,283	\$2,913,216	\$9,808,054
Commercial & Industrial		\$-	\$511,279	\$6,121,068	\$6,121,068	\$6,105,098	\$18,858,512
Residential		\$-	\$273,488	\$1,786,093	\$2,103,261	\$2,237,344	\$6,400,187
Total	\$302,869	\$357,820	\$1,394,809	\$11,059,638	\$11,080,612	\$11,255,658	\$35,451,407

* Year-end balance

** Irrigation Pilot is sum of March, April, May 2022. 2022 Irrigation costs are sum of expenses from June – December.

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 provides the most recent entries in the deferred account to date of the application.

G. Reason for Continuation of Deferred Accounting

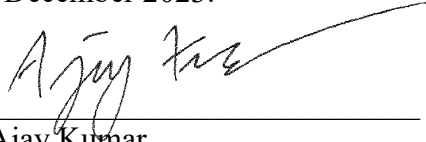
As discussed in this application, continuation of this deferral is necessary to track the costs and revenues associated with implementing demand response programs approved by the Commission under Schedule 106.

V. CONCLUSION

PacifiCorp respectfully requests that, in accordance with ORS 757.259(2)(e), the Commission reauthorize the Company to maintain a balancing account to defer costs associated with demand response program approved by the Commission under Schedule 106 for the 12 months beginning January 1, 2024.

Respectfully submitted this 28th day of December 2023.

By:



Ajay Kumar
Assistant General Counsel
PacifiCorp d/b/a Pacific Power

Exhibit A

Notice

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2265(1)

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
Application for Approval of Deferred
Accounting for Related to the Demand
Response Programs Approved in Schedule 106

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

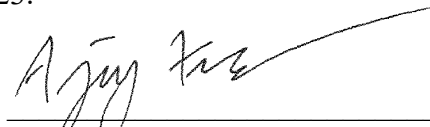
On December 28, 2023, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) filed an application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing deferred accounting for the program costs related to demand response programs approved by the Commission under Tariff Schedule 106. The authorization 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 28, 2023.

By:



Ajay Kumar
Assistant 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

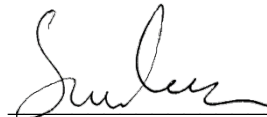
PACIFICORP	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com	KATHERINE A MCDOWELL (C) MCDOWELL RACKNER & GIBSON PC 419 SW 11TH AVE., SUITE 400 PORTLAND, OR 97205 katherine@mrg-law.com
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WILLIAM 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	
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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 28th day of December, 2023.



Santiago Gutierrez
Coordinator, Regulatory Operations

Exhibit B

Acct. 186035

	<u>Beginning Balance</u>	<u>Program Costs</u>	<u>Rate Recovery</u>	<u>Carrying Charge</u>	<u>Ending Balance</u>
January	478,923.69	41,780.59	(13,478.84)	978.00	508,203.44
February	508,203.44	3,995.00	(12,879.44)	999.00	500,318.00
March	500,318.00	117,429.58	(12,705.77)	1,096.00	606,137.81
April	606,137.81	157.88	(209,214.08)	995.00	398,076.61
May	398,076.61	158,954.84	(187,169.96)	762.00	370,623.49
June	370,623.49	231,419.23	(191,431.48)	775.00	411,386.24
July	411,386.24	97,510.54	(210,744.91)	704.00	298,855.87
August	298,855.87	32,550.76	(230,474.33)	396.00	101,328.30
September	101,328.30	88,894.88	(203,422.17)	87.00	(13,111.99)
October	(13,111.99)	45,964.62	(181,199.72)	(160.00)	(148,507.09)
November	(148,507.09)	818,640.75	(204,925.40)	314.00	465,522.26
YTD 2023		\$ 1,637,298.67	\$ (1,657,646.08)	\$ 6,946.00	