

June 14, 2023

VIA ELECTRONIC FILING

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

RE: LC 82 – PacifiCorp Errata Filing for PacifiCorp's 2023 Clean Energy Plan and Clean Energy Data Templates

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) hereby submits the attached Errata to its May 31, 2023, 2023 Clean Energy Plan and June 2, 2023, Clean Energy Plan Data Templates.

The Company determined there was a numerical error in the 2023 Clean Energy Plan on page 25 in table 6 and in the preceding paragraph referencing the table. For convenience, both a red-line and clean version of the corrected page 25 are enclosed.

The Company also determined there were errors in the Clean Energy Plan Data Templates on pages 27 and 57. On page 27 the data in the columns labeled Natural Gas and Coal should be swapped, and on page 57 the last five column headers were missing. Replacement pages are also enclosed.

Informal inquiries may be directed to Stephanie Meeks, Regulatory Manager, at (503) 813-5867.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosure

2023 Clean Energy Plan

Page 25 Table 6

In addition to tracking Oregon-allocated CO₂ emissions, for its CEP PacifiCorp proposes a metric for percent renewables/non-emitting resource mix. Table 6 indicates that PacifiCorp’s 2021 Oregon-allocated fuel mix contained 24.725.1 percent renewable and non-emitting percentage of electricity used to serve Oregon retail customers. Renewable energy includes biomass, geothermal, solar and wind generation where the company maintains the renewable energy credits. Non-emitting energy represents hydroelectric generation.

Table 6 – Oregon Allocated Renewable/Non-emitting Resources (%)

Source	2021 Oregon Fuel Mix
Renewable	<u>19.920.2</u> %
Non-emitting	4.8.9%
Total	<u>24.75.1</u> %

Oregon-allocated CO₂ emissions for the portfolios analyzed within the CEP are provided in Table 15 of Chapter VI Resource Planning. The company’s portfolio analyses indicate that the CEP portfolio, the CBRE portfolio, the small-scale Renewable (SSR) sensitivity portfolio and the No Purchases portfolio are expected to reduce CO₂ emissions relative to the 2023 IRP Preferred Portfolio. On an Oregon allocated basis, CO₂ emissions for each of these portfolios ranges between 2.1 percent and 16.2 percent lower than CO₂ emissions for the 2023 IRP Preferred portfolio. Please refer to Chapter IV Resource Planning for additional portfolio detail.

Energy Equity

Energy equity is the concept that all members of society should be able to afford and have access to a necessary and basic supply of energy. Energy burdened households spend a disproportionate amount of their income on home energy costs. Tracking energy burden by census tract provides an indicator of energy equity for communities in PacifiCorp’s Oregon service regions.

Energy burden is average annual housing energy costs divided by average annual household income. PacifiCorp will aim to mitigate and not disproportionately allocate costs to highly impacted communities and vulnerable populations. PacifiCorp defines a customer as experiencing high energy burden when they spend six percent or more of their income on home energy costs. This threshold is based on the definition of “high” energy burden used by the American Council for an Energy-Efficient Economy (ACEEE).¹⁴

For its CEP, PacifiCorp has established the Interim CBI of Decrease Proportion of Households Experiencing High Energy Burden. The company’s energy burden estimates by census tract rely on the Department of Energy’s Low-Income Energy Affordability Data (LEAD) Tool.¹⁵ The

¹⁴ Drenhobl, Ariel, Ross, Lauren, and Ayala, Roxana. *How High Are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burden across the United States*. (ACEEE; September 2020) (available online: <https://www.aceee.org/sites/default/files/pdfs/u2006.pdf>).

¹⁵ Additional information regarding the LEAD Tool Methodology available at www.openai.org.

In addition to tracking Oregon-allocated CO₂ emissions, for its CEP PacifiCorp proposes a metric for percent renewables/non-emitting resource mix. Table 6 indicates that PacifiCorp’s 2021 Oregon-allocated fuel mix contained 25.1 percent renewable and non-emitting percentage of electricity used to serve Oregon retail customers. Renewable energy includes biomass, geothermal, solar and wind generation where the company maintains the renewable energy credits. Non-emitting energy represents hydroelectric generation.

Table 6 – Oregon Allocated Renewable/Non-emitting Resources (%)

Source	2021 Oregon Fuel Mix
Renewable	20.2%
Non-emitting	4.9%
Total	25.1%

Oregon-allocated CO₂ emissions for the portfolios analyzed within the CEP are provided in Table 15 of Chapter VI Resource Planning. The company’s portfolio analyses indicate that the CEP portfolio, the CBRE portfolio, the small-scale Renewable (SSR) sensitivity portfolio and the No Purchases portfolio are expected to reduce CO₂ emissions relative to the 2023 IRP Preferred Portfolio. On an Oregon allocated basis, CO₂ emissions for each of these portfolios ranges between 2.1 percent and 16.2 percent lower than CO₂ emissions for the 2023 IRP Preferred portfolio. Please refer to Chapter IV Resource Planning for additional portfolio detail.

Energy Equity

Energy equity is the concept that all members of society should be able to afford and have access to a necessary and basic supply of energy. Energy burdened households spend a disproportionate amount of their income on home energy costs. Tracking energy burden by census tract provides an indicator of energy equity for communities in PacifiCorp’s Oregon service regions.

Energy burden is average annual housing energy costs divided by average annual household income. PacifiCorp will aim to mitigate and not disproportionately allocate costs to highly impacted communities and vulnerable populations. PacifiCorp defines a customer as experiencing high energy burden when they spend six percent or more of their income on home energy costs. This threshold is based on the definition of “high” energy burden used by the American Council for an Energy-Efficient Economy (ACEEE).¹⁴

For its CEP, PacifiCorp has established the Interim CBI of Decrease Proportion of Households Experiencing High Energy Burden. The company’s energy burden estimates by census tract rely on the Department of Energy’s Low-Income Energy Affordability Data (LEAD) Tool.¹⁵ The

¹⁴ Drenhobl, Ariel, Ross, Lauren, and Ayala, Roxana. *How High Are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burden across the United States*. (ACEEE; September 2020) (available online: <https://www.aceee.org/sites/default/files/pdfs/u2006.pdf>).

¹⁵ Additional information regarding the LEAD Tool Methodology available at www.openai.org.

Clean Energy Plan Data Templates

Pages 27 and 57

