

September 1, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-1166

Re: UE 400—PacifiCorp Errata Filing

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) hereby submits the attached Errata to the Reply Testimony (PAC/500) of Mr. Michael G. Wilding and (PAC/600) of Mr. Ramon Mitchell in the above-referenced docket.

Following submission of an errata in the 2021 Power Cost Adjustment Mechanism, docket UE 407, the Company determined a correction was needed in Mr. Wilding's reply testimony in the Company's 2023 Transition Adjustment Mechanism, docket UE 400. This Errata corrects a graph in Mr. Wilding's reply testimony (PAC/500, Wilding/5, Figure 1) that reflects the changes submitted in an errata filing that was made in PacifiCorp's 2021 Power Cost Adjustment Mechanism docket UE 407.

Following submission of reply testimony in the Company's general rate case docket UE 399, the Company determined a technical correction was needed in Mr. Mitchell's testimony. This Errata corrects a miscalculation in Confidential Table 6 (PAC/600, Mitchell/62, Confidential Table 6). For convenience, both a red-line and clean version of the corrected testimony are enclosed.

Please direct informal questions to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Shelley McCoy
Director, Regulation

Enclosure

Docket No. UE 400
Exhibit PAC/500
Witness: Michael G. Wilding

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PACIFICORP

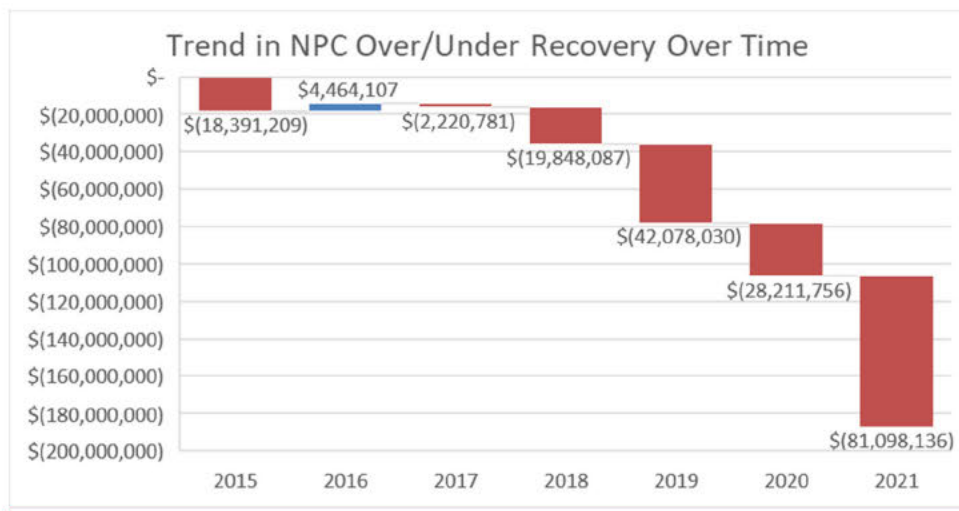
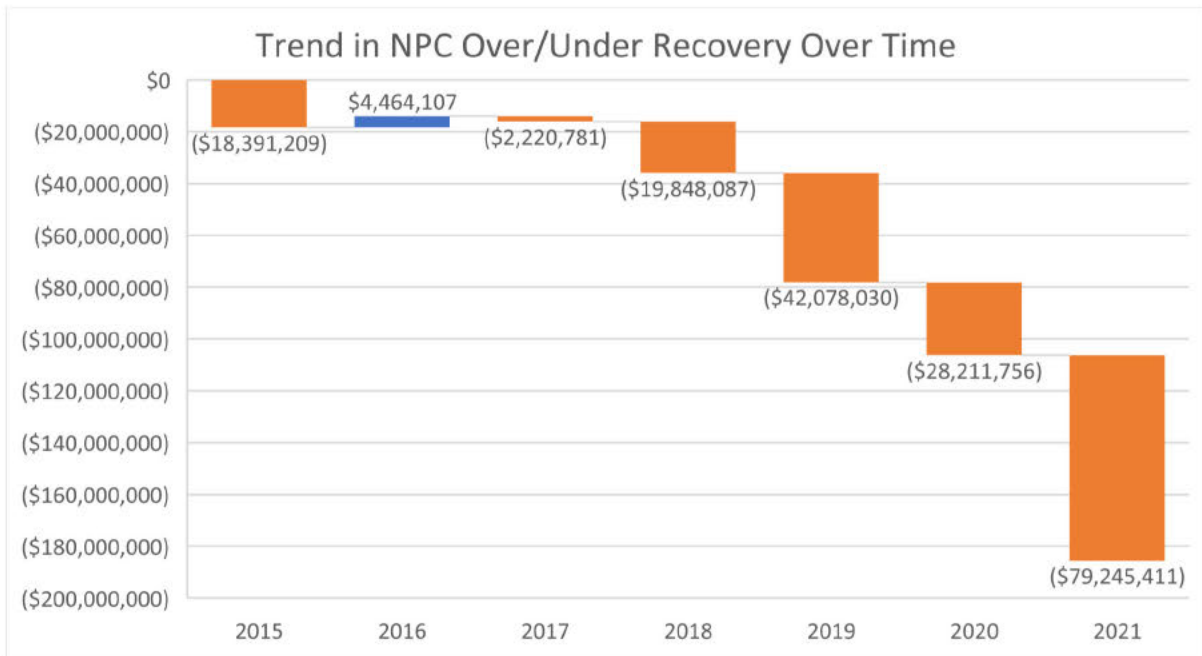
REDLINE

Errata Reply Testimony of Michael G. Wilding

September 2022

1
2

FIGURE 1
Oregon NPC Collected in Rates versus Actual NPC³



3
4
5

TABLE 1
Oregon NPC Collected in Rates versus Actual NPC³

Year	NPC Collected Through Rates	Actual NPC	Over/(Under) Recovery of NPC (\$)	Over/(Under) Recovery of NPC (%)
------	-----------------------------	------------	-----------------------------------	----------------------------------

³ The calculation of 2016 actual NPC used for the analysis performed in this testimony does not include certain coal costs that were excluded in the TAM. The exclusion of these costs from actual NPC shows a small over-recovery of NPC in 2016. If these costs were included in actual NPC, it would show a small under-recovery in 2016.

Docket No. UE 400
Exhibit PAC/500
Witness: Michael G. Wilding

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PACIFICORP

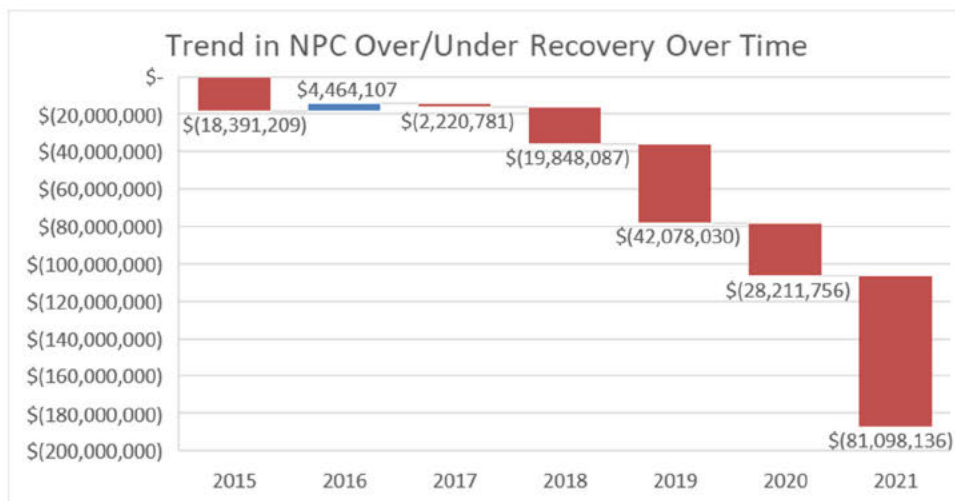
CLEAN

Errata Reply Testimony of Michael G. Wilding

September 2022

1
2

FIGURE 1
Oregon NPC Collected in Rates versus Actual NPC³



3
4

TABLE 1
Oregon NPC Collected in Rates versus Actual NPC³

Year	NPC Collected Through Rates	Actual NPC	Over/(Under) Recovery of NPC (\$)	Over/(Under) Recovery of NPC (%)
2015	\$343,993,011	\$362,384,220	\$(18,391,209)	(5)%
2016	\$347,055,570	\$342,591,463	\$4,464,107	1%
2017	\$340,640,219	\$342,861,000	\$(2,220,781)	(1)%
2018	\$334,683,850	\$354,531,937	\$(19,848,087)	(6)%
2019	\$340,850,405	\$382,928,436	\$(42,078,030)	(11)%
2020	\$307,368,806	\$335,580,562	\$(28,211,756)	(8)%
2021	\$281,150,581	\$360,395,991	\$(79,245,411)	(22)%

Note: Beginning in 2017, PTCs have been included in the TAM and NPC.

³ The calculation of 2016 actual NPC used for the analysis performed in this testimony does not include certain coal costs that were excluded in the TAM. The exclusion of these costs from actual NPC shows a small over-recovery of NPC in 2016. If these costs were included in actual NPC, it would show a small under-recovery in 2016.

REDACTED

Docket No. UE 400

Exhibit PAC/600

Witness: Ramon Mitchell

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PACIFICORP

REDACTED

Errata Reply Testimony of Ramon Mitchell

September 2022

1

Confidential Table 62 **G. Planned Outage Schedule**

3 **Q. Please describe the Company's proposal to refine how it models planned outages**
4 **in the TAM.**

5 A. The Company proposes replacing normalized outage assumptions with actual
6 budgeted and/or planned outages to more accurately reflect the planned outages that
7 are expected during the rate year.

8 **Q. Is the Company's proposal consistent with how NPC is forecast for other Oregon**
9 **utilities?**

10 A. Yes. It is my understanding that both Idaho Power and Portland General Electric
11 forecast outages based on utility planning, rather than using a historical four-year
12 average.⁶⁸ PacifiCorp's proposal therefore aligns its NPC forecasting methodology
13 with that used by other utilities in Oregon.

⁶⁸ For example, PGE's Schedule 125 states that its annual power cost update filing includes an update for "projected planned plant outages." In docket UM 1355, the Commission approved a stipulation for Idaho Power that allowed it to "continue to forecast its planned outages." *In re Investigation into Forecasting Forced Outage Rates for Electric Generating Units*, Docket No. UM 1355, Order No. 10-414, App. C at 7 (Oct. 22, 2010).