

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UE 407**

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER, ) OREGON CITIZENS' UTILITY  
 ) BOARD'S SUPPLEMENTAL EXHIBITS  
Application for Approval of an Automatic )  
Adjustment Clause for Recovery of Costs )  
Associated with the Company's Wildfire )  
Protection Plan. )  
\_\_\_\_\_ )

Pursuant to Administrative Law Judge (“ALJ”) Mapes’ January 31, 2023 Memorandum, the Oregon Citizens’ Utility Board’s (“CUB”) submits these supplemental exhibits. At the time CUB’s cross-examination statement and exhibits were filed, CUB was awaiting a response to Data Request (“DR”) 1 to PacifiCorp in the above-captioned matter. CUB has now received responses to DR 1, and attaches them here for inclusion in the administrative record. The Stipulating Parties have all stipulated to CUB’s submission of the following exhibits:

- CUB/201 – PacificCorp’s narrative response to CUB DR 1;
- CUB/202 – PacifiCorp’s response Attach CUB 1a-1 to CUB DR 1;
- CUB/203 – PacifiCorp’s response Attach CUB 1a-2 to CUB DR 1;
- CUB/204 – PacifiCorp’s response Attach CUB 1b-1 to CUB DR 1; and
- CUB/205 – PacifiCorp’s response Attach CUB 1b-2 to CUB DR 1.

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The aforementioned exhibits are attached to this filing. CUB is submitting a contemporaneously filed Motion to Admit these exhibits to the administrative record.

Dated this 17<sup>th</sup> day of February, 2023.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael P. Goetz".

Michael P. Goetz, OSB #141465  
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UE 407 / PacifiCorp  
February 15, 2023  
CUB Data Request 1

### **CUB Data Request 1**

Please refer to PAC/400/McVee/5, lines 8 12.

- (a) Please provide a list of all deferrals including those that had been re-authorized) and automatic adjustment clauses that PacifiCorp had in use before the Public Utility Commission of Oregon as of Nov. 29, 2007. This request includes automatic adjustment clause mechanisms that may not have been actively litigated at the time (i.e., if the Company had a n automatic adjustment clause like the mechanism at issue in this proceeding, please provide it in the list even if costs were not actively litigated).
- (b) Please provide a list of all deferrals (including those that have been re-authorized) and automatic adjustment clauses that PacifiCorp has in use before the Public Utility Commission of Oregon as of the date of PacifiCorp s response to this data request. This request includes automatic adjustment clause mechanisms that may not be actively litigated at the time (i.e., the Company has the Renewable Adjustment Clause (from SB 838, even though it currently does not have an active RAC filing.

### **Response to CUB Data Request 1**

- (a) The Company objects to this request as overly burdensome and seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, the Company responds as follows:

Please refer to Attachment CUB 1a-1 which provides a list of deferrals that may have been in place as of November 29, 2007. PacifiCorp made a good faith effort to review deferral applications posted on the Public Utility Commission of Oregon's (OPUC) website, but due to the historical nature of the information, this list may not be complete. A full review of the docket history was not performed and there is no assurance that all deferrals are identified in this response.

Please refer to Attachment CUB 1a-2 which provides a list of adjustment schedules that were in place in 2007 and 2008 and may have been before the Commission before the end of 2007. In an effort to provide as complete a list as possible, PacifiCorp is providing all adjustment schedules without agreeing that these are automatic adjustment clause mechanisms.

- (b) Please refer to Attachment CUB 1b-1 for a list of current deferrals for which PacifiCorp has sought approval from the Commission. Please note that not all deferrals listed have been approved.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

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CUB Data Request 1

Please refer to Attachment CUB 1b-2 which provides a list of adjustment schedules that are in place as of the date of this response. In an effort to provide as complete a list as possible, PacifiCorp is providing all adjustment schedules without agreeing that these are automatic adjustment clause mechanisms.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

**List of Deferrals as of November 29, 2007**

<b>Docket</b>	<b>Description</b>	<b>Date of Initial Filing</b>
UM 958	In the Matter of the Application of PacifiCorp for Authorization to Defer Costs Related to Implementing Senate Bill 1149	11/23/1999
UM 1102	In the Matter of PacifiCorp Application for Deferred Accounting Order Regarding Intervenor Funding Grants	8/7/2003
UM 1229	In the Matter of Pacific Power & Light Company, dba PacifiCorp Application for a Deferred Accounting Order Regarding Certain Tax Expenses	9/8/2006
UM 1285	In the Matter of PacifiCorp dba Pacific Power Application for a Deferred Accounting Order Regarding the Costs Associated with an Independent Evaluator of the Company's Draft 2012 Request for Proposals	11/9/2006

## EFFECTIVE IN 2007

SCHEDULE	DESCRIPTION	PURPOSE
Schedule 91	Low Income Bill Payment Assistance Fund	The purpose of this Schedule is to collect funds for electric low-income bill payment assistance as specified in Oregon Laws.
Schedule 92	Klamath Rate Reconciliation Adjustment	Adjustment to balance revenue changes due to the implementation of transition rates for Klamath Basin irrigation customers. The Klamath Basin Irrigation and Drainage pumping transition rate period was enacted into law by the 2005 legislature through Senate Bill 81 and set forth in ORS 757.227. Consistent with Order No. 06-172 (Docket UE 170) and as clarified in Order No. 06-440, the seven year transition period to standard tariff for these customers concluded on April 16, 2013. Klamath basin irrigation customers were served under the standard irrigation rates in Schedule 41, Agricultural Pumping Service as of April 17, 2013.
Schedule 93	Transaction and Deferred Tax Adjustment	Amortization of the rate credits associated with the Administrative and General costs and the West Valley lease, as agreed to in the MidAmerican Energy Holdings Company transaction and approved in Order No. 06-352.
Schedule 95	Miscellaneous Deferred Accounts Credit	Per Docket No UE 170, Order No 05-1050, the OPUC approved the consolidation of the remaining balances of certain inactive Oregon-specific regulatory assets and liabilities to be consolidated into one new balancing account under Tariff Schedule 95. The remaining balances of future regulatory assets and liabilities will be included in this account and the tariff adjusted as appropriate.
Schedule 97	Intervenor Funding Adjustment	This schedule is for amortization of intervenor funding payments.
Schedule 98	Adjustment Associated with the Pacific Northwest Electric Power Planning and Conservation Act (BPA Columbia River Benefits Credit)	Provides residential and other qualifying customers with a direct pass-through of monetary benefits received from the Bonneville Power Administration (BPA) under the Residential Exchange Program (REP) in accordance with a Residential Exchange Program Settlement Implementation Agreement (REPSIA), Contract No. 11PB-12466. The Public Utility Commission of Oregon (Commission) authorized PacifiCorp to execute the REPSIA in Order No. 11-113 (entered April 11, 2011), Docket No. UM 926.  The Commission previously authorized PacifiCorp to implement a balancing account for tracking the receipt of benefits from BPA and passing through the benefits to customers under Schedule 98. The balancing account may contain both positive and negative balances.
Schedule 101	Municipal Exaction Adjustment	This schedule makes known local municipal exactions, imposed on the Company by municipalities and billed separately by the Company to Customers within the jurisdiction's limits.
Schedule 103	Multnomah County Business Income Tax Recovery (MCBIT)	To recover from Consumers in Multnomah County the Multnomah County Business Income Tax (MCBIT) paid by the Company in accordance with Chapter 12 of the Multnomah County Code and OAR 860-022-0045.
Schedule 290	Public Purpose Charge	To collect nonbypassable public purpose charges from retail electricity Consumers pursuant to Oregon Administrative Rule (OAR) 860-038-0480 and Oregon Revised Statute (ORS) 757.612.
Schedule 291	Residential Consumer SB1149 Adjustment	This schedule recovers additional costs associated with the implementation of Senate Bill 1149 as authorized by the Commission in Order 00-039. These costs include those directly related to the development of Service Options for Residential Consumers as well as those related to general implementation of SB 1149 as allocated to Residential Consumers.
Schedule 292	Small Non Residential Consumer SB1149 Adjustment	This Schedule recovers additional costs associated with the implementation of Senate Bill 1149 as authorized by the Commission in Order 00-039. These costs include those directly related to the development of Service Options for Small Nonresidential Consumers as well as those related to general implementation of SB 1149 as allocated to Small Nonresidential Consumers. The costs also include adjustments related to Schedule 291, Transition Adjustment. Any difference between the estimated market value of resources used for purposes of calculating the Transition Adjustment and their actual market value of the resources as reflected in market transactions will accrue to the balance in the Schedule.

Schedule 293	Large Non Residential Consumer SB1149 Adjustment	This Schedule recovers additional costs associated with the implementation of Senate Bill 1149 as authorized by the Commission in Order 00-039. These costs include those directly related to the development of Service Options for Large Nonresidential Consumers as well as those related to general implementation of SB 1149 as allocated to Large Nonresidential Consumers. These costs include 10% surcharge related to the Returning Service Payment in Schedule 200 not paid by Daily Standard Offer Customers during the first quarter during which Direct Access Service is offered. The costs also include adjustments related to Schedule 294, Transition Adjustment. Any difference between the estimated market value of resources used for purposes of calculating the Transition Adjustment and the actual market value of the resources as reflected in market transaction will accrue to the balance in the Schedule.
Schedule 296	Direct Access Shopping Incentive Deferred Account Surcharge	Schedule 296 recovers the costs associated with the Company's Schedule 781, Direct Access Shopping Incentive Adjustment.

**NEW IN 2008**

<b>SCHEDULE</b>	<b>DESCRIPTION</b>	
Schedule 102	Income Tax Adjustment (SB 408)	The purpose of this schedule is to implement the automatic adjustment required by ORS 757.268 and implemented by the Commission in OAR 860-022-0041.
Schedule 103	Multnomah County Business Income Tax Adjustment related to SB 408	Added to the MCBIT tariff was SB408 adjustment to establish the automatic adjustment clause and balancing account required by OAR 860-022-041.
Schedule 297	Energy Conservation Charge	To fund or implement cost-effective energy conservation measures pursuant to the Oregon Renewable Energy Act, SB 838 (2007), Section 46.

**List of Deferrals as of February 13, 2023**

<b>Docket</b>	<b>Description</b>	<b>Date of Initial Filing</b>
UM 1102	Intervenor Funding Grants	8/2/2003
UM 1483	Oregon Solar Incentive Program (OSIP) Costs	5/19/2010
UM 1693	Net Power Cost Variances - Power Cost Adjustment Mechanism	5/15/2014
UM 1764	Annual Regulatory Fees	3/11/2016
UM 1797	Renewable Energy Certificate Purchases	9/9/2016
UM 1964	Transportation Electrification Plan	7/27/2018
UM 1981	Community Solar Start-Up Costs	11/27/2018
UM 1983	Multnomah County Income Tax (MCBIT) Expense	11/27/2018
UM 2013	Wildfire Mitigation Costs	5/14/2019
UM 2027	Energy Storage	6/17/2019
UM 2063	COVID-19 Costs	3/20/2020
UM 2116	Wildfire Damage & Restoration Costs	9/14/2020
UM 2134	Cedar Springs 2	12/10/2020
UM 2138	Metro Business Profit Tax	12/21/2020
UM 2142	Cholla Unity 4 Property Taxes	12/24/2020
UM 2158	Schedule 95, Pilot Program Cost Adjustment	3/8/2021
UM 2159	Wildfire Risk Mitigation Measures and Vegetation Management	3/11/2021
UM 2161	Deer Creek Mine Royalty Payment Costs	3/19/2021
UM 2167	Pryor Mountain REC Revenues	5/13/2021
UM 2185	Pension Settlement	7/27/2021
UM 2186	TB Flats	7/27/2021
UM 2189	Insurance Premiums	8/12/2021
UM 2189	Pre-filed Emergency Deferral Account	9/3/2021
UM 2200	Residential and Non-Residential 2021 Transportation Electrification Pilots (Advice No. 21-016)	10/20/2021
UM 2220	Distribution System Planning	1/3/2022
UM 2221	Wildfire Protection Plan	1/5/2022
UM 2222	House Bill 2021 - Utility Community Benefits and Impacts Advisory Group (UCBIAG)	1/6/2022
UM 2223	House Bill 2475 - Low-Income Discount Costs and Revenues	1/6/2022
UM 2224	House Bill 2165 - Transportation Electrification Charge	1/7/2022
UM 2238	House Bill 2475 - Low Income Bill Discount Administrative Costs	3/29/2022
UM 2265	Schedule 106 Demand Response Programs	12/14/2022
UM 2269	Oregon Independent Evaluator and 3rd Party Expert for RFPs	12/27/2022
UM 2275	Washington Climate Commitment Act (Chehalis Dispatch)	2/3/2023



**Current adjustment schedules February 13, 2023**

<b>SCHEDULE</b>	<b>DESCRIPTION</b>	<b>PURPOSE</b>
Schedule 91	Low Income Bill Payment Assistance Fund	The purpose of this Schedule is to collect funds for electric low-income bill payment assistance as specified in Oregon Laws 2021, Ch. 536, §2
Schedule 92	Low Income Discount Cost Recovery Adjustment	The purpose of this Schedule is, in accordance with ORS 757.695, to collect funds for the electric low-income discount as specified in Schedule 7. This discount is enabled by House Bill 2475 (2021 regular sessions) which modified ORS 757.230 to allow for differentiated rates for “low-income customers and other economic, social equity, or environmental justice factors that affect affordability for certain classes of utility customers.” This adjustment schedule is implemented as an automatic adjustment clause as provided for in ORS 757.210.
Schedule 93	Independent Evaluator Cost Adjustment	This schedule recovers the costs for the Oregon independent evaluator for requests for proposals under the competitive bidding guidelines, pursuant to Order No. 06-446. As of 2/13/2023, the adjustment rate for all schedules is 0.000¢ per kWh, for all kWh
Schedule 96	Property Sales Balancing Account Adjustment	This schedule is for amortization of the property sales balancing account. As of 2/13/2023, the adjustment rate is 0.000¢ per kWh,
Schedule 97	Intervenor Funding Adjustment	This schedule is for amortization of intervenor funding payments. As of 2/13/2023, the adjustment rate for all schedules is 0.000¢ per kWh, for all kWh
Schedule 98	Adjustment Associated with the Pacific Northwest Electric Power Planning and Conservation Act (BPA Columbia River Benefits Credit)	Provides residential and other qualifying customers with a direct pass-through of monetary benefits received from the Bonneville Power Administration (BPA) under the Residential Exchange Program (REP) in accordance with a Residential Exchange Program Settlement Implementation Agreement (REPSIA), Contract No. 11PB-12466. The Public Utility Commission of Oregon (Commission) authorized PacifiCorp to execute the REPSIA in Order No. 11-113 (entered April 11, 2011), Docket No. UM 926.  The Commission previously authorized PacifiCorp to implement a balancing account for tracking the receipt of benefits from BPA and passing through the benefits to customers under Schedule 98. The balancing account may contain both positive and negative balances.
Schedule 101	Municipal Exaction Adjustment	This schedule makes known local municipal exactions, imposed on the Company by municipalities and billed separately by the Company to Customers within the jurisdiction’s limits
Schedule 103	Multnomah County Business Income Tax Recovery	To recover from Consumers in Multnomah County the Multnomah County Business Income Tax (MCBIT) paid by the Company in accordance with Chapter 12 of the Multnomah County Code and OAR 860-022-0045.

Schedule 202	Renewable Adjustment Clause (Supply Service Adjustment)	<p>This schedule recovers, between rate cases, the costs to construct or otherwise acquire facilities that generate electricity from renewable energy sources and for associated electricity transmission.</p> <p>This adjustment is to recover the actual and forecasted revenue requirement associated with the prudently incurred costs of resources, including associated transmission, that are eligible under Senate Bill 838 (2007) and in service as of the date of the proposed rate change. The revenue requirement includes the actual return of and grossed up return on capital costs of the renewable energy source and associated transmission at the currently authorized rate of return, forecasted operation and maintenance costs, forecasted property taxes, forecasted energy tax credits, and other forecasted costs not captured in the Transition Adjustment Mechanism (TAM). The revenue requirement for Oregon will be calculated using the forecasted inter-jurisdictional allocation factors based on the same 12-month period used in the TAM.</p>
Schedule 203	Renewable Resource Deferral Adjustment (Supply Service Adjustment)	This schedule recovers the costs deferred for renewable resources as authorized by the Commission.
Schedule 204	Oregon Solar Incentive Program Deferral (Supply Service Adjustment)	This schedule recovers the costs deferred for the Oregon Solar Incentive Program as authorized in Docket UM 1483.
Schedule 207	Community Solar Start-Up Cost Recovery Adjustment	This schedule recovers costs incurred for the start-up of the State of Oregon's Community Solar Program including the costs associated with the State of Oregon's Program Administrator, Low Income Facilitator and the Company's prudently incurred costs associated with implementing the program that are not otherwise recovered in rates. The recovery of these costs is authorized by ORS 757.386 (7)(c) and OAR 860-088-0160. This adjustment schedule is implemented as an automatic adjustment clause as provided under ORS 757.210 to allow recovery of operations and maintenance start-up costs as soon as the cost data is approved by the Commission.
Schedule 290	Public Purpose Charge	To collect nonbypassable public purpose charges from retail electricity Consumers pursuant to Oregon Administrative Rule (OAR) 860-038-0480 and Oregon Revised Statute (ORS) 757.612.
Schedule 291	System Benefits Charge	To fund programs which provide a system benefit including planning and pursuit of cost-effective energy efficiency resources pursuant to Oregon Laws 2021, Ch. 547, §2, support and integrate transportation electrification pursuant to Oregon Laws 2021, Ch. 95, §2, and other programs approved by the Commission