

November 2, 2023

#### VIA ELECTRONIC FILING

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

RE: Advice No. 23-019—Schedule 204 – Oregon Solar Incentive Program Deferral Supply Service Adjustment

In compliance with ORS 757.205, OAR 860-022-0025, OAR 860-022-0030, and ORS 757.210, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) encloses for filing proposed tariff pages associated with Tariff P.U.C. OR No. 36, which sets forth all rates, tolls, charges, rules, and regulations applicable to electric service in the State of Oregon. The Company respectfully requests an effective date of January 1, 2024.

Sheet Number	Schedule	Title
Twelfth Revision of Sheet No. 204	Schedule 204	Oregon Solar Incentive Program
		Deferral Supply Service Adjustment

#### **Purpose**

The purpose of this filing is to revise the rates in Schedule 204 to amortize the deferral balance relating to docket UM 1483 associated with the Company's costs for the Oregon Solar Incentive Program (OSIP) deferred during the 12 months ended September 30, 2023. The Company has reviewed rates for this purpose annually; the last filing was effective January 1, 2022.

#### **Proposal**

During the OSIP program year, the Company deferred approximately \$3.2 million, excluding interest, for the 12 months ended September 30, 2023. The deferral includes costs for program administration, incentive payments, and meter costs. The total deferral balance also reflects offsetting credits for customer charges and an avoided energy value. In addition, a residual

<sup>&</sup>lt;sup>1</sup> Docket No. UM 1483(12) was filed on May 18, 2022, with a deferral period of 12 months beginning May 19, 2022, and was approved in Order No. 22-486. Docket No. UM 1483(13) was filed on May 18, 2023, with a deferral period of 12 months beginning May 19, 2023, and is pending before the Commission.

<sup>&</sup>lt;sup>2</sup> Advice No. 10-022 was approved at the December 28, 2010, Public Meeting. Advice No. 11-019 was approved at the December 20, 2011, Public Meeting. Advice No. 12-019 was approved at the January 29, 2013, Public Meeting. Advice No. 13-019 was approved at the Public Meeting on January 21, 2014. Advice No. 14-012 was approved at the Public Meeting on December 16, 2014; continuation of amortization at the rates set in Advice No. 14-012 was approved in Docket No. UE 302 at the Public Meeting on January 26, 2016. Advice 16-014 was approved at the Public Meeting on December 20, 2016. Docket No. UE 334 was approved at the Public Meeting on December 18, 2017. Docket No. UE 351/Advice 18-007 was approved at the Public Meeting on December 18, 2018. Advice No. 19-016 was approved at the Public Meeting on December 17, 2019. Docket No. UE 383 was approved at the Public Meeting on December 15, 2020. Advice No. 21-021 was approved at the Public Meeting on December 14, 2021.

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credit balance of approximately \$0.8 million relating to 2022 program cost amortization has reduced the balance that PacifiCorp is seeking to amortize in this filing. The total amount, including interest, proposed to be amortized in rates is \$2.6 million which is a \$2.3 million decrease from the amount currently in rates.

As PacifiCorp has previously stated, the earnings test set forth in ORS 757.259(5) is not applicable to the requested deferral amortization because PacifiCorp applied for deferral under ORS 757.365(10) or, in the alternative, ORS 469A.120,<sup>3</sup> neither of which subject deferral amortization to the three percent cap set forth in ORS 757.259(6). However, the requested deferral amortization is less than three percent of the Company's earnings, as required by ORS 757.259(6). Thus, while PacifiCorp takes the position that the costs associated with this mandatory program are not subject to the three percent cap on amortization of deferred costs under ORS 757.259(6), the deferral amortization is, in fact, less than three percent of the Company's earnings.

To support this supplemental filing and meet the requirements of OAR 860-022-0025 and OAR 860-022-0030, the Company submits proposed Schedule 204 along with the following attachments:

<u>Attachment A</u>: OSIP Deferral Adjustment Schedule 204 Proposed Rates and Revenues <u>Attachment B</u>: Estimated Effect of Proposed Price Change

Consistent with the previously approved rate spread for the OSIP deferral adjustment, the proposed rate spread is based on the spread of present generation revenues. The rate spread is shown in Attachment A along with proposed rates.

As shown on Attachment B, the filing results in an overall rate decrease of \$2.3 million, or 0.1 percent. This proposed change will affect approximately 652,000 customers. The average residential customer using 900 kilowatt-hours per month would see a monthly bill decrease of \$0.13 as a result of this change.

It is respectfully requested that all data requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center

**PacifiCorp** 

825 NE Multnomah, Suite 2000

Portland, OR 97232

<sup>&</sup>lt;sup>3</sup> PacifiCorp also applied under the general deferral statute, ORS 757.259 in the event the Commission found that neither ORS 757.365 nor ORS 469A.120 provided grounds for deferral.

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

Sincerely,

Matthew McVee

Vice President, Regulatory Policy and Operations

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Enclosures





#### OREGON SCHEDULE 204

## OREGON SOLAR INCENTIVE PROGRAM DEFERRAL SUPPLY SERVICE ADJUSTMENT

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#### **Purpose**

This schedule recovers the costs deferred for the Oregon Solar Incentive Program as authorized in Docket UM 1483.

#### **Applicable**

To all Residential consumers and Nonresidential consumers.

#### **Energy Charge**

The adjustment rate is listed below by Delivery Service Schedule.

Delivery Service Schedule	<u>Charge</u>	
4	0.017 cents per kWh	(R)
5	0.017 cents per kWh	(R)
15	0.012 cents per kWh	
23, 723	0.016 cents per kWh	(R)
28, 728	0.016 cents per kWh	(R)
30, 730	0.015 cents per kWh	(R)
41, 741	0.015 cents per kWh	(R)
47, 747	0.014 cents per kWh	(R)
48, 748	0.014 cents per kWh	(R)
51, 751	0.012 cents per kWh	
53, 753	0.012 cents per kWh	
54, 754	0.012 cents per kWh	

### **Attachment A**

## OSIP Deferral Adjustment Schedule 204 Proposed Rates and Revenues

PACIFIC POWER

Calculation of Proposed Oregon Solar Incentive Program Deferral Adjustment - Schedule 204

#### FORECAST 12 MONTHS ENDED DECEMBER 31, 2024

				_	Proposed Schedule 204 OSIP				
Line No.	Description	Sch No.	MWh*	Generation Rate Spread	Rate (¢/kWh)	Revenues (\$000)			
	(1)	(2)	(3)	(4)	(5)	(6)			
	Residential								
1	Residential	4	5,829,081	37.4%	0.017	\$991			
2	<b>Total Residential</b>		5,829,081			\$991			
	Commercial & Industrial								
3	Gen. Svc. < 31 kW	23	1,166,351	7.0%	0.016	\$187			
4	Gen. Svc. 31 - 200 kW	28	2,084,027	12.4%	0.016	\$333			
5	Gen. Svc. 201 - 999 kW	30	1,325,081	7.7%	0.015	\$199			
6	Large General Service >= 1,000 kW	48	6,123,426	33.9%	0.014	\$857			
7	Partial Req. Svc. >= 1,000 kW	47	32,263		0.014	\$5			
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	0		-	\$0			
9	Agricultural Pumping Service		237,644	1.4%	0.015	\$36			
10	Total Commercial & Industrial		10,968,792			\$1,616			
	<u>Lighting</u>								
11	Outdoor Area Lighting Service	15	2,054		0.012	\$0			
12	Street Lighting Service Comp. Owned	51	7,381		0.012	\$1			
13	Street Lighting Service Cust. Owned	53	7,519		0.012	\$1			
14	Recreational Field Lighting	54	1,394		0.012	\$0			
15	<b>Total Lighting</b>		18,348	0.1%	0.012	\$2			
16	Subtotal		16,816,221	100.0%	=	\$2,609			
17	Emplolyee Discount					(\$1)			
18	<b>Total Sales with Employee Discount</b>				=	\$2,609			

<sup>\*</sup> Includes lighting tariff MWh

# Attachment B Estimated Effect of Proposed Price Change

## PACIFIC POWER ESTIMATED EFFECT OF PROPOSED PRICE CHANGE ON REVENUES FROM ELECTRIC SALES TO ULTIMATE CONSUMERS DISTRIBUTED BY RATE SCHEDULES IN OREGON FORECAST 12 MONTHS ENDED DECEMBER 31, 2024

					Present Revenues (\$000)		Proposed Revenues (\$000)			Change					
Line		Sch	No. of		Base		Net	Base		Net	Base R		Net Ra		Line
No.	Description	No	Cust	MWh	Rates	Adders <sup>1</sup>	Rates	Rates	Adders <sup>1</sup>	Rates	(\$000)	<b>%</b> 2	(\$000)	<b>%</b> 2	No.
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
							(5) + (6)			(8) + (9)	(8) - (5)	(11)/(5)	(10) - (7)	(13)/(7)	
	Residential														
1	Residential	4	540,041	5,829,081	\$737,548	\$24,132	\$761,681	\$737,548	\$23,316	\$760,865	\$0	0.0%	(\$816)	-0.1%	1
2	Total Residential		540,041	5,829,081	\$737,548	\$24,132	\$761,681	\$737,548	\$23,316	\$760,865	\$0	0.0%	(\$816)	-0.1%	2
	Commercial & Industrial														
3	Gen. Svc. < 31 kW	23	85,313	1,166,351	\$149,483	\$5,551	\$155,034	\$149,483	\$5,400	\$154,883	\$0	0.0%	(\$152)	-0.1%	3
4	Gen. Svc. 31 - 200 kW	28	10,587	2,084,027	\$186,116	\$23,424	\$209,541	\$186,116	\$23,132	\$209,249	\$0	0.0%	(\$292)	-0.1%	4
5	Gen. Svc. 201 - 999 kW	30	872	1,325,081	\$105,890	\$13,822	\$119,712	\$105,890	\$13,636	\$119,526	\$0	0.0%	(\$186)	-0.2%	5
6	Large General Service >= 1,000 kW	48	182	6,123,426	\$435,177	\$23,061	\$458,238	\$435,177	\$22,265	\$457,442	\$0	0.0%	(\$796)	-0.2%	6
7	Partial Req. Svc. >= 1,000 kW	47	6	32,263	\$4,320	\$121	\$4,441	\$4,320	\$117	\$4,437	\$0	0.0%	(\$4)	-0.2%	7
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	1	0	\$1,219	\$308	\$1,527	\$1,219	\$308	\$1,527	\$0	0.0%	\$0	0.0%	8
9	Agricultural Pumping Service	41	7,913	237,644	\$30,384	(\$2,250)	\$28,134	\$30,384	(\$2,281)	\$28,103	\$0	0.0%	(\$31)	-0.1%	9
10	Total Commercial & Industrial		104,874	10,968,792	\$912,589	\$64,037	\$976,626	\$912,589	\$62,577	\$975,166	\$0	0.0%	(\$1,460)	-0.2%	10
	Lighting														
11	Outdoor Area Lighting Service	15	5,703	8,050	\$788	\$275	\$1,063	\$788	\$275	\$1,063	\$0	0.0%	\$0	0.0%	11
12	Street Lighting Service Comp. Owned	51	1,121	21,063	\$2,715	\$1,044	\$3,759	\$2,715	\$1,044	\$3,759	\$0	0.0%	\$0	0.0%	12
13	Street Lighting Service Cust. Owned	53	292	7,519	\$392	\$237	\$629	\$392	\$237	\$629	\$0	0.0%	\$0	0.0%	13
14	Recreational Field Lighting	54	100	1,394	\$88	\$56	\$143	\$88	\$56	\$143	\$0	0.0%	\$0	0.0%	14
15	<b>Total Public Street Lighting</b>		7,215	38,026	\$3,983	\$1,611	\$5,594	\$3,983	\$1,611	\$5,594	\$0	0.0%	\$0	0.0%	15
16	Subtotal		652,131	16,835,899	\$1,654,120	\$89,781	\$1,743,901	\$1,654,120	\$87,505	\$1,741,625	\$0	0.0%	(\$2,276)	-0.1%	16
17	Emplolyee Discount		975	13,481	(\$419)	(\$14)	(\$433)	(\$419)	(\$13)	(\$433)	\$0		\$0		17
17	Paperless Credit				(\$2,072)	• /	(\$2,072)	(\$2,072)	. ,	(\$2,072)	\$0		\$0		17
18	AGA Revenue				\$3,521		\$3,521	\$3,521		\$3,521	\$0		\$0		18
19	COOC Amortization				\$1,767		\$1,767	\$1,767		\$1,767	\$0		\$0		19
20	Total Sales with AGA		652,131	16,835,899	\$1,656,916	\$89,767	\$1,746,683	\$1,656,916	\$87,491	\$1,744,408	\$0	0.0%	(\$2,276)	-0.1%	20

Excludes effects of the Low Income Bill Payment Assistance Charge (Sch. 91), Low Income Discount Cost Recovery Adjustment (Sch. 92), BPA Credit (Sch. 98), Public Purpose Charge (Sch. 290) and System Benefits Charge (Sch. 291).

<sup>&</sup>lt;sup>2</sup> Percentages shown for Schedules 48 and 47 reflect the combined rate change for both schedules