

May 5, 2022

# VIA ELECTRONIC FILING

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

### Re: Advice No. 22-006—Schedule 94—Wildfire Mitigation and Vegetation Management Cost Recovery Adjustment

In accordance with ORS 757.205, ORS 757.210, and OAR 860-022-0025 and -0030, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits for filing the following proposed tariff page associated with Tariff P.U.C. OR No. 36 which sets forth all rates, tolls, charges, rules, and regulations applicable to electric service in Oregon. The purpose of this filing is to update Schedule 94—Wildfire Mitigation and Vegetation Management (WMVM) Cost Recovery Adjustment (Schedule 94). The WMVM mechanism was adopted in Order No. 20-473 and implementation of Schedule 94 was subsequently approved in Advice No. 21-015 to recover incremental costs authorized for recovery through the WMVM mechanism. In accordance with Order No. 20-473, PacifiCorp respectfully requests an effective date of November 5, 2022.

Sheet No.	<u>Tariff</u>	<u>Title</u>
First Revision Sheet No. 94	Schedule 94	Wildfire Mitigation and Vegetation
		Management Cost Recovery Adjustment

To support this filing and meet the requirements of OAR 860-022-0025 and OAR 860-022-0230, Pacific Power submits the tariff sheet listed above along with the following exhibits:

- 1. Exhibit A Calculation of Proposed Rates
- 2. Exhibit B Estimated Effect of Proposed Rate Change
- 3. Exhibit C 2021 Earnings Test

### **Background**

In Order No. 20-473, the Commission authorized PacifiCorp to recover deferred operations and maintenance (O&M) costs and the revenue requirement for incremental wildfire mitigation capital projects placed in service during the prior year. This filing includes projects placed in service from January 1, 2021 through December 31, 2021. The Commission also directed PacifiCorp to include the following information in the annual filing:

1. Vegetation management and wildfire mitigation O&M expenditures associated with the amount recovered in base rates;

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- 2. Total incremental vegetation management O&M expenditures;
- 3. Total incremental wildfire mitigation O&M expenditures;
- 4. Total incremental wildfire mitigation capital expenditures; and,
- 5. Narrative description of the effect, if any, that the earnings test and performance metrics have on the recovery of incremental costs.

PacifiCorp addresses each of these requirements below.

# Wildfire Mitigation and Vegetation Management O&M

In Order No. 20-473 PacifiCorp was authorized to recover \$30.0 million, Oregon allocated, for wildfire mitigation and vegetation management O&M expenditures. PacifiCorp incurred total-company actual O&M expenditures of \$44.6 million (\$43.6 million Oregon allocated) as outlined in Table 1 below. These costs include the base vegetation management program work (which had increases due to general inflationary pressures and low resource availability) in addition to wildfire mitigation program elements associated with situational awareness, asset inspections, and response to weather events during fire season. The largest portion of that increase is due to increased vegetation management work and general cost escalation and inflationary pressures. Different than the wildfire mitigation spending, which reflects an increase in scope to accomplish additional work within high-risk areas, this spend has been identified due to the increase in costs experienced in 2021 to accomplish the core work of the program, such as tree trimming and routine tree removal. Increased labor costs have been experienced as the market for vegetation management workers has become more competitive. This has not only increased the base labor costs for the vegetation management program but has also increased costs for labor premiums to attract additional travel crews to the area.

# Wildfire Mitigation Capital Investments Placed In-Service

In Order No. 20-473 PacifiCorp was authorized to include incremental wildfire mitigation capital expenditures in the WMVM mechanism. All wildfire mitigation capital expenditures in 2021 are considered incremental as none of these investments have been included in rates. Total capital investments placed in service in 2021 are outlined in Table 1 below and include the installation of line reclosers, transmission relay replacements, installation of weather stations, line rebuilds to covered conductor, and purchase of wildfire equipment/vehicles. The application and benefits of these wildfire mitigation investments are further explained in the Company's 2022 Wildfire Protection Plan (WPP) that was recently approved by the Commission in docket UM 2207. While the 2022 WPP discusses the work to be done in 2022, it explains these multi-year efforts in more detail. In 2021, PacifiCorp completed the installation/replacement of 33 line reclosers, replaced three transmission relays, installed three weather stations, and completed two miles of line rebuilds to covered conductor. PacifiCorp also purchased four Utility Vehicles for line patrols and facilities inspection purposes.

	Total
	Company
	(\$ millions)
Wildfire Mitigation and Veg Management O&M	
Vegetation Management Program Work – Distribution	\$42.3
Vegetation Management Program Work – Transmission	\$1.3
Distribution Line Inspections in Fire High Consequence	\$0.6
Area zones	\$0.0
Weather Stations and Weather Monitoring	\$0.2
Fire Weather Operational Response	\$0.1
Vegetation Analytics and Mapping	\$0.1
O&M Total Spend	\$44.6
Wildfire Mitigation Capital	
Installation of Line Reclosers	1.64
Transmission Relay Replacements	1.57
Installation of Weather Stations	0.37
Line rebuilds to Covered Conductor	0.33
Purchase of Wildfire Equipment / Vehicles	0.14
Capital Total	\$4.05

# Table 1: Summary of WMVM O&M and Capital InvestmentJanuary 1, 2021 through December 31, 2021

# **Review of Performance Metrics**

Per Order No. 20-476, "the performance metrics will be applied using the results of Safety Staff's audit, available in September or October, just prior to the November rate-effective date."<sup>1</sup> The impact of the performance metrics on the overall recovery of incremental costs will be reviewed when the results of the Safety Staff audit are available.

# Earnings Test

Per Order No. 20-476, recovery of the first \$6.645 million of incremental capital and O&M expenditures are subject to performance metrics and the corresponding earnings test as set forth below.

Performance Metric (Number of Violations)	Earnings Test (Return on Equity)
0 - 74	None
75 - 149	8.5%
150 - 199	8.0%
200+	7.5%

Additionally, "costs beyond the first incremental \$6.645 million will be subject to an earnings test set at the company's ROE as authorized in this proceeding, except in the event that violations occur at or above Level II and at least one violation occurs in a FHCA zone, in which case the earnings test would use the authorized ROE minus 50 basis points."

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PacifiCorp has recently completed its December 2021 Oregon Results of Operations, including the earnings test calculation for the Power Cost Adjustment Mechanism. The Company proposes using this same earnings test return on equity (ROE) for the WMVM as it reflects Type 1 results without weather adjustments. This earnings test provided as Exhibit C, shows PacifiCorp earned a 5.177 percent ROE for 2021, well below the most restrictive earnings test for recovery under the WMVM.

### **Revenue Requirement and Proposed Change to Schedule 94**

As shown in Table 2 below, the overall impact of the Oregon-allocated incremental WMVM costs incurred in 2021 is a rate increase of \$14.3 million. The proposed change will affect approximately 646,000 customers. The overall rate increase to customers is approximately 1.1 percent. A residential customer using 900 kilowatt-hours per month will see a monthly bill increase of approximately \$1.33 per month as a result of this change.

	Wildfire Mitig	ation &	/egetation Ma	anagement				
	12 ME Dec 2021 Test Period							
	Total 12	ME Dec 20	121 Test Period	u Oregon				
	Company	Factor	Factor %	Allocated				
Capital Investment								
Distribution	1,908,948	OR	100.0000%	1,908,948				
Transmission	1,588,307	SG	26.0226%	413,319				
General - System	407,792	SO	27.1865%	110,864				
General - Situs	140,390	OR	100.0000%	140,390				
Depreciation Reserve								
Distribution	(15,805)	OR	100.0000%	(15,805				
Transmission	(11,088)	SG	26.0226%	(2,885				
General - System	(6,550)	SO	27.1865%	(1,781)				
General - Situs	(2,964)	OR	100.0000%	(2,964)				
Accumulated DIT Balance								
Distribution	(7,509)	OR	100.0000%	(7,509)				
Transmission	(9,052)	SG	26.0226%	(2,355)				
General - System	(9,652)	SO	27.1865%	(2,624)				
General - Situs	(3,127)	OR	100.0000%	(3,127)				
Working Capital	102,956	SG	26.0226%	26,792				
Net Rate Base	4,082,647			2,561,263				
	8.69%			8.69%				
Pre-Tax Return on Rate Base	354,620			222,472				
Operation & Maintenance								
Transmission	1,300,000	SG	26.0226%	338,294				
Distribution	13,300,000	OR	100.0000%	13,300,000				
Depreciation								
Distribution	15,805	OR	100.0000%	15,805				
Transmission	11,088	SG	26.0226%	2,885				
General - System	6,550	SO	27.1865%	1,781				
General - Situs	2,964	OR	100.0000%	2,964				
Property Taxes								
Rev. Reqt. Before Franchise Tax & Bad Debt	14,991,028			13,884,202				
Franchise Taxes (2.366%)	366,340			339,292				
Bad Debt Expense (0.336%)	51,986			48,148				
Resource Suppliers Tax (0.129%)	19,974			18,499				
PUC Fee (0.350%)	54,192			50,191				
Total Revenue Requirement	15,483,520			14,340,332				

### **Table 2: Revenue Requirement**

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The Company requests that all formal information requests regarding this advice filing 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 questions regarding this advice filing may be directed to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely, Shilly McCoy

Shelley McCoy Director, Regulation

Enclosures

**Proposed Tariff Change** 



# OREGON SCHEDULE 94

# WILDFIRE MITIGATION AND VEGETATION MANAGEMENT COST RECOVERY ADJUSTMENT

Page 1

(I)

(I)

#### Purpose

The purpose of this schedule is to implement the wildfire mitigation and vegetation management cost recovery mechanism consistent with Order No. 20-473.

#### Applicable

To all Residential and Nonresidential Consumers.

#### **Monthly Billing**

All bills calculated in accordance with Schedules contained in the presently effective Tariff will have applied an amount equal to the product of all kWh multiplied by the following applicable rate as listed by Delivery Service schedule.

Schedule 4	0.145 ¢ per kWh
Schedule 5	0.145 ¢ per kWh
Schedule 15	1.110 ¢ per kWh
Schedule 23, 723	0.168 ¢ per kWh
Schedule 28, 728	0.078 ¢ per kWh
Schedule 30, 730	0.056 ¢ per kWh
Schedule 41. 741	0.181 ¢ per kWh
Schedule 47, 747	0.036 ¢ per kWh
Schedule 48, 748, 848	0.036 ¢ per kWh
Schedule 51, 751	1.066 ¢ per kWh
Schedule 53, 752	0.136 ¢ per kWh
Schedule 54, 754	0.176 ¢ per kWh

# Exhibit A

#### PACIFIC POWER State of Oregon Proposed Wildfire Mitigation and Vegetation Management Cost Recovery Adjustment - Schedule 94

#### FORECAST 12 MONTHS ENDED DECEMBER 31, 2023

					Present	Distribtion	Proposed	WMVM
Line		Sch	No. of	Distribution	Distribtion	Rate		
No.	Description	No.	Cust	MWh*	Revenues	Spread	Rates	Revenues
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	<u>Residential</u>							
1	Residential	4	535,059	5,633,856	\$257,562	56.970%	0.145	\$8,169
2	Total Residential		535,059	5,633,856	\$257,562			\$8,169
	Commercial & Industrial							
3	Gen. Svc. < 31 kW	23	84,329	1,137,011	\$60,110	13.296%	0.168	\$1,910
4	Gen. Svc. 31 - 200 kW	28	10,462	1,992,271	\$49,074	10.855%	0.078	\$1,554
5	Gen. Svc. 201 - 999 kW	30	797	1,281,581	\$22,730	5.028%	0.056	\$718
6	Large General Service >= 1,000 kW	48	190	3,555,464	\$39,937		0.036	\$1,280
7	Partial Req. Svc. >= 1,000 kW	47	6	29,109	\$1,712	9.612%	0.036	\$10
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	1	286,471	\$1,805		0.036	\$103
9	Agricultural Pumping Service	41	7,997	263,565	\$15,064	3.332%	0.181	\$477
10	Total Commercial & Industrial		103,782	8,545,471	\$190,434			\$6,052
	Lighting							
11	Outdoor Area Lighting Service	15	5,809	2,108	\$737	0.163%	1.110	\$23
12	Street Lighting Service Comp. Owned	51	1,108	8,373	\$2,812	0.622%	1.066	\$89
13	Street Lighting Service Cust. Owned	53	314	11,452	\$489	0.108%	0.136	\$16
14	Recreational Field Lighting	54	102	1,141	\$63	0.014%	0.176	\$2
15	Total Public Street Lighting		7,333	23,074	\$4,102			\$130
16	Subtotal		646,174	14,202,402	\$452,097	100.000%		\$14,352
17	Employee Discount		966	13,030	(\$142)		(0.036)	(\$5)
18	Total		646,174	14,202,402	\$451,955		:	\$14,347

\* Includes Distribution Only consumer MWh and lighting tariff MWh.

# Exhibit B

#### 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, 2023

		Pre	Pro			Pres	ent Revenues (\$0	)00)	Propo	sed Revenues (\$	000)		Cha	nge		
Line		Sch	Sch	No. of		Base		Net	Base		Net	Base R		Net Ra		Line
No.	Description	No.	No.	Cust	MWh	Rates	Adders <sup>1</sup>	Rates	Rates	Adders <sup>1</sup>	Rates	(\$000)	% <sup>2</sup>	(\$000)	% <sup>2</sup>	No.
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	
								(6) + (7)			(9) + (10)	(9) - (6)	(12)/(6)	(11) - (8)	(14)/(8)	
	Residential															
1	Residential	4	4	535,059	5,633,856	\$597,063	\$9,738	\$606,801	\$597,063	\$17,907	\$614,970	\$0	0.0%	\$8,169	1.4%	1
2	Total Residential			535,059	5,633,856	\$597,063	\$9,738	\$606,801	\$597,063	\$17,907	\$614,970	\$0	0.0%	\$8,169	1.4%	2
	Commercial & Industrial															
3	Gen. Svc. < 31 kW	23	23	84,329	1,137,011	\$124,438	\$1,015	\$125,453	\$124,438	\$2,925	\$127,363	\$0	0.0%	\$1,910	1.5%	3
4	Gen. Svc. 31 - 200 kW	28	28	10,462	1,992,271	\$163,732	\$9,197	\$172,929	\$163,732	\$10,751	\$174,483	\$0	0.0%	\$1,554	0.9%	4
5	Gen. Svc. 201 - 999 kW	30	30	797	1,281,581	\$94,197	\$4,696	\$98,893	\$94,197	\$5,414	\$99,611	\$0	0.0%	\$718	0.7%	5
6	Large General Service >= 1,000 kW	48	48	190	3,555,464	\$224,400	(\$15,394)	\$209,007	\$224,400	(\$14,114)	\$210,287	\$0	0.0%	\$1,280	0.6%	6
7	Partial Req. Svc. >= 1,000 kW	47	47	6	29,109	\$3,974	(\$120)	\$3,854	\$3,974	(\$109)	\$3,865	\$0	0.0%	\$10	0.6%	7
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	848	1	0	\$1,805	\$10	\$1,815	\$1,805	\$113	\$1,918	\$0	0.0%	\$103	5.7%	8
9	Agricultural Pumping Service	41	41	7,997	263,565	\$29,194	(\$3,645)	\$25,549	\$29,194	(\$3,168)	\$26,026	\$0	0.0%	\$477	1.9%	9
10	Total Commercial & Industrial			103,782	8,259,000	\$641,740	(\$4,241)	\$637,499	\$641,740	\$1,812	\$643,552	\$0	0.0%	\$6,052	1.0%	10
	Lighting															
11	Outdoor Area Lighting Service	15	15	5,809	8,260	\$915	\$74	\$989	\$915	\$98	\$1,013	\$0	0.0%	\$23	2.4%	11
12	Street Lighting Service Comp. Owned	51	51	1,108	23,893	\$3,498	\$387	\$3,885	\$3,498	\$476	\$3,974	\$0	0.0%	\$89	2.3%	12
13	Street Lighting Service Cust. Owned	53	53	314	11,452	\$657	\$210	\$867	\$657	\$225	\$882	\$0	0.0%	\$16	1.8%	13
14	Recreational Field Lighting	54	54	102	1,141	\$82	\$27	\$108	\$82	\$29	\$110	\$0	0.0%	\$2	1.9%	14
15	Total Public Street Lighting			7,333	44,746	\$5,151	\$698	\$5,849	\$5,151	\$828	\$5,979	\$0	0.0%	\$130	2.2%	15
16	Subtotal			646,174	13,937,602	\$1,243,954	\$6,196	\$1,250,150	\$1,243,954	\$20,547	\$1,264,501	\$0	0.0%	\$14,352	1.2%	16
17	Employee Discount			966	13,030	(\$341)	(\$6)	(\$346)	(\$341)	(\$10)	(\$351)	\$0		(\$5)		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			646,174	13,937,602	\$1,248,901	\$6,190	\$1,255,091	\$1,248,901	\$20,537	\$1,269,438	\$0	0.0%	\$14,347	1.1%	20

<sup>1</sup> Excludes effects of the Low Income Bill Payment Assistance Charge (Sch. 91), BPA Credit (Sch. 98), Public Purpose Charge (Sch. 290) and System Benefits Charge (Sch. 291).

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

# Exhibit C

# PACIFICORP PACIFICURP State of Oregon Actual, Adjusted & Normalized Results of Operations - 2020 Protocol Results of Operations December 2021 EXCLUDING TYPE 1 ADJUSTMENTS FOR NORMALIZING HYDRO & WEATHER

	(1) Unadjusted Results	(2) Type 1 Adjustments	(3) Total Adjusted Acutal Results	(4) Type 1 NPC Adjustments	(5) Total Adjusted Actual Results Less Type 1 NPC Adjustments
1 Operating Revenues:					
2 General Business Revenues	1,251,099,183	(13,932,239)	1,237,166,944	5,847,440	1,243,014,384
3 Interdepartmental 4 Special Sales	- 48,684,161		- 48,684,161		- 48,684,161
5 Other Operating Revenues	67,900,532	(1.752.551)	66,147,982		66,147,982
6 Total Operating Revenues	1,367,683,876	(15,684,790)	1,351,999,086	5,847,440	1,357,846,526
7					
8 Operating Expenses:					
9 Steam Production	236,357,759	3,782,726	240,140,485	-	240,140,485
10 Nuclear Production 11 Hydro Production	- 4,969,712	- 6,776,671	- 11,746,383		- 11,746,383
12 Other Power Supply	306,509,656	(17,995,652)	288,514,004	18,638,888	307,152,892
13 Transmission	62,244,254	(391,337)	61,852,917		61,852,917
14 Distribution	90,345,072	(11,427)	90,333,644	-	90,333,644
15 Customer Accounting	21,131,768	(12,577)	21,119,191	-	21,119,191
16 Customer Service & Info	5,191,665	10,054	5,201,719	-	5,201,719
17 Sales	- 54,240,476	- (2,090,819)	- 50 140 657		-
18 Administrative & General xx	04,240,470	(2,090,019)	52,149,657	-	52,149,657
19 Total O&M Expenses	780,990,362	(9,932,360)	771,058,001	18,638,888	789,696,889
20 Depreciation	263,260,145	28,146,535	291,406,680	-	291,406,680
21 Amortization	19,269,830	(4,102,209)	15,167,621	-	15,167,621
22 Taxes Other Than Income	80,455,030	-	80,455,030		80,455,030
23 Income Taxes - Federal	(48,861,943)	(3,287,473)	(52,149,417)	(2,564,911)	(54,714,328)
24 Income Taxes - State	(1,039,808)	(744,522)	(1,784,330)	(580,881)	(2,365,211)
25 Income Taxes - Def Net 26 Investment Tax Credit Adj.	22,401,135	(565,888)	21,835,247	-	21,835,247
27 Misc Revenue & Expense	- (354,111)	356,686	- 2,575		2,575
xx	(001,111)	000,000	2,010		2,010
28 Total Operating Expenses: 29	1,116,120,640	9,870,768	1,125,991,408	15,493,095	1,141,484,503
30 Operating Rev For Return:	251,563,236	(25,555,558)	226,007,679	(9,645,655)	216,362,024
31 32 Rate Base:					
33 Electric Plant In Service	8,733,680,486	(34,749,428)	8,698,931,058	_	8,698,931,058
34 Plant Held for Future Use	9,562,956	(9,562,956)	-	-	-
35 Misc Deferred Debits	186,382,617	(112,612,446)	73,770,171		73,770,171
36 Elec Plant Acq Adj	1,811,970	-	1,811,970	-	1,811,970
37 Pensions	10,833,104	(10,833,104)	-		-
38 Prepayments 39 Fuel Stock	14,561,730 50,706,706		14,561,730 50,706,706		14,561,730 50,706,706
40 Material & Supplies	83,712,816	-	83,712,816	_	83,712,816
41 Working Capital	14,639,024	(131,991)	14,507,033	146,441	14,653,474
42 Weatherization Loans	-		-	-	-
43 Misc Rate Base		-	-	-	-
XX	0.405.004.400	(407 000 005)	0 000 004 400	110 111	0.000.447.004
44 Total Electric Plant: 45	9,105,891,408	(167,889,925)	8,938,001,483	146,441	8,938,147,924
46 Rate Base Deductions:					
47 Accum Prov For Deprec	(2,872,034,835)	(438,803,015)	(3,310,837,850)		(3,310,837,850)
48 Accum Prov For Amort	(206,212,385)	-	(206,212,385)	_	(206,212,385)
49 Accum Def Income Tax	(631,364,534)	27,217,689	(604, 146, 846)	-	(604,146,846)
50 Unamortized ITC	(52,044)	-	(52,044)	-	(52,044)
51 Customer Adv For Const	(35,087,653)	9,777,658	(25,309,995)		(25,309,995)
52 Customer Service Deposits	- (404 505 074)	-	-	-	- (400 506 206)
53 Misc Rate Base Deductions 54	(481,525,374)	51,998,977	(429,526,396)	-	(429,526,396)
55 Total Rate Base Deductions 56	(4,226,276,826)	(349,808,691)	(4,576,085,516)	-	(4,576,085,516)
57 Total Rate Base:	4,879,614,582	(517,698,615)	4,361,915,966	146,441	4,362,062,407
58 59 Return on Rate Base	5.155%		5.181%		4.960%
xx 60 Return on Equity	5.551%	0.050%	5.600%		5.177%

Unadjusted results do not include the impacts of accelerated Oregon Coal-Fired Steam Plant Depreciation and inclusion of Jim Bridger and Trapper Mine rate base additions which are included as Type 1 adjustments.
Type 1 adjustments involve normalization for out of period historic and unusual items that occur during the test period.
Type 1 adjustments in column (4) exclude adjustments for weather and hydro normalization