

September 28, 2023

VIA ELECTRONIC FILING

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

RE: ADV 1529/Advice 23-015—Schedule 190—Wildfire Mitigation Plan Cost Recovery Adjustment – Supplemental Filing

On June 30, 2023, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) filed Advice 23-015 to update the rates in Schedule 190 – Wildfire Mitigation Plan Cost Recovery Adjustment. While preparing a response to a Public Utility Commission of Oregon Staff (Staff) information request on the Company’s filing, PacifiCorp discovered that approximately \$1.8 million, total company, of the intangible (software) costs were duplicated in the Company’s original filing. Removal of these duplicate capital costs reduces the revenue requirement by approximately \$65,000 on an Oregon-allocated basis. As shown in Table 1 below, the Company’s total request for recovery should be \$47.37 million, rather than \$47.43 million as stated in its original filing. At the request of Staff, PacifiCorp is submitting this supplemental filing to update the request to \$47.37 million. With the change noted in Table 1, this request results in an increase over the Schedule 190 amount currently in rates of \$25.7 million.

**Table 1
 Revised Total 2023 Wildfire Mitigation Plan
 Automatic Adjustment Clause**

	Revised Filing		Original Filing
	Total Company	Oregon Allocated	Oregon Allocated
Incremental Capital Costs	20,336,019	8,228,691	
Annual Revenue Requirement	2,172,355	877,127	942,580
2022 Outstanding Deferral Balance		27,903,607	27,903,607
2023 Incremental WMP O&M		18,586,716	18,586,716
Total 2023 WMP AAC		47,368,450	47,432,903

PacifiCorp submits the following updated tariff sheet reflecting this change and respectfully requests a November 5, 2023 rate effective date consistent with the terms of the Stipulation adopted in Order No. 23-173.¹ The proposed revision to the Tariff Index from the initial filing is not affected by this update and remains as originally proposed.

<u>Sheet No.</u>	<u>Tariff</u>	<u>Title</u>
Thirty-third Revision of Sheet No. INDEX-3		Tariff Index
First Revision of Sheet No. 190	Schedule 190	Wildfire Mitigation Plan Cost Recovery Adjustment

To support this filing and meet the requirements of OAR 860-022-0025 and OAR 860-022-0230, and the Stipulation adopted in Order No. 23-173, PacifiCorp submits the tariff sheets listed above along with the following Attachment(s):

1. Attachment A – Calculation of Proposed Rates
2. Attachment B – Estimated Effect of Proposed Rate Change

The proposed change will affect approximately 652,000 customers. The effect of the proposed change is an annual rate increase of approximately \$25.7 million or 1.5 percent. If approved, a residential customer using 900 kWh per month would see a bill increase of \$2.52 per month as a result of this change.

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

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

¹ Per formal rulemaking and OAR 860-300-0020, the Wildfire Protection Plan (WPP) is now referred to as the Wildfire Mitigation Plan (WMP). Accordingly, PacifiCorp proposes in this filing to update the name of the recovery tariff to refer to the Wildfire Mitigation Plan instead of the Wildfire Protection Plan.

PROPOSED TARIFF SHEETS

+Schedule No.

SUPPLY SERVICE	
200	Base Supply Service
201	Net Power Costs – Cost-Based Supply Service
210	Portfolio Time-of-Use Supply Service
211	Portfolio Renewable Usage Supply Service
212	Portfolio Fixed Renewable Energy– Supply Service
213	Portfolio Habitat Supply Service
220	Standard Offer Supply Service
230	Emergency Supply Service
247	Partial Requirements Supply Service
276R	Large General Service/Partial Requirements Service – Economic Replacement Power Rider Supply Service
ADJUSTMENTS	
90	Summary of Effective Rate Adjustments
91	Low Income Bill Payment Assistance Fund
92	Low Income Discount Cost Recovery Adjustment
93	Independent Evaluator Cost Adjustment
94	Wildfire Mitigation and Vegetation Management Cost Recovery Adjustment
96	Property Sales Balancing Account Adjustment
97	Intervenor Funding Adjustment Cost Recovery Adjustment
98	Adjustment Associated with the Pacific Northwest Electric Power Planning and Conservation Act
101	Municipal Exaction Adjustment
103	Multnomah County Business Income Tax Recovery
190	Wildfire Mitigation Plan Cost Recovery Adjustment (C)
192	Deferred Accounting Adjustment
194	Replaced Meter Deferred Amounts Adjustment
198	Deer Creek Mine Closure Deferred Amounts Adjustment
202	Renewable Adjustment Clause – Supply Service Adjustment
203	Renewable Resource Deferral – Supply Service Adjustment
204	Oregon Solar Incentive Program Deferral – Supply Service Adjustment
205	TAM Adjustment for Other Revenues
206	Power Cost Adjustment Mechanism – Adjustment
207	Community Solar Start-Up Cost Recovery Adjustment
270	Renewable Energy Rider – Optional
271	Energy Profiler Online – Optional
272	Renewable Energy Rider – Optional Bulk Purchase Option
290	Public Purpose Charge
291	System Benefits Charge
294	Transition Adjustment
295	Transition Adjustment – Three-Year Cost of Service Opt-Out
296	Transition Adjustment – Five-Year Cost of Service Opt-Out
299	Rate Mitigation Adjustment

WILDFIRE MITIGATION PLAN COST RECOVERY ADJUSTMENT
Purpose

The purpose of this schedule is to implement cost recovery related to the Company's wildfire mitigation plan automatic adjustment clause consistent with OAR 860-300-0080 and ORS 757.210 and Order No. 23-173.

(C)

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	0.477 ¢ per kWh
Schedule 5	0.477 ¢ per kWh
Schedule 15	2.637 ¢ per kWh
Schedule 23, 723	0.536 ¢ per kWh
Schedule 28, 728	0.205 ¢ per kWh
Schedule 30, 730	0.137 ¢ per kWh
Schedule 41, 741	0.566 ¢ per kWh
Schedule 47, 747	0.087 ¢ per kWh
Schedule 48, 748, 848	0.087 ¢ per kWh
Schedule 51, 751	2.561 ¢ per kWh
Schedule 53, 752	0.322 ¢ per kWh
Schedule 54, 754	0.403 ¢ per kWh

(I)

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Attachment A – Calculation of Proposed Rates

PACIFIC POWER
State of Oregon
Proposed Wildfire Mitigation Plan Cost Recovery Adjustment - Schedule 190

FORECAST 12 MONTHS ENDED DECEMBER 31, 2024

Line No.	Description	Sch No.	No. of Cust	Distribution MWh*	Present Distribution Revenues	Distribution Rate Spread	Proposed WMP	
							Rates	Revenues
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<u>Residential</u>								
1	Residential	4	540,041	5,829,081	\$318,437	58.732%	0.477	\$27,805
2	Total Residential		540,041	5,829,081	\$318,437			\$27,805
<u>Commercial & Industrial</u>								
3	Gen. Svc. < 31 kW	23	85,313	1,166,351	\$71,508	13.189%	0.536	\$6,252
4	Gen. Svc. 31 - 200 kW	28	10,587	2,084,027	\$48,965	9.031%	0.205	\$4,272
5	Gen. Svc. 201 - 999 kW	30	872	1,325,081	\$20,829	3.842%	0.137	\$1,815
6	Large General Service >= 1,000 kW	48	182	6,123,426	\$61,136	11.791%	0.087	\$5,327
7	Partial Req. Svc. >= 1,000 kW	47	6	32,263	\$1,575		0.087	\$28
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	1	270,182	\$1,219		0.087	\$235
9	Agricultural Pumping Service	41	7,913	237,644	\$15,391	2.839%	0.566	\$1,345
10	Total Commercial & Industrial		104,874	11,238,974	\$220,622			\$19,275
<u>Lighting</u>								
11	Outdoor Area Lighting Service	15	5,703	2,054	\$620	0.114%	2.637	\$54
12	Street Lighting Service Comp. Owned	51	1,121	7,381	\$2,163	0.399%	2.561	\$189
13	Street Lighting Service Cust. Owned	53	292	7,519	\$277	0.051%	0.322	\$24
14	Recreational Field Lighting	54	100	1,394	\$64	0.012%	0.403	\$6
15	Total Public Street Lighting		7,215	18,348	\$3,125			\$273
16	Subtotal		652,131	17,086,403	\$542,184	100.000%		\$47,353
17	Employee Discount		975	13,481	(\$177)		(0.119)	(\$16)
18	Total		652,131	17,086,403	\$542,007			\$47,337

* Includes Distribution Only consumer MWh and lighting tariff MWh.

Attachment B – Estimated Effect of Proposed Rate 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

Line No.	Description	Sch No.	No. of Cust	MWh	Present Revenues (\$000)			Proposed Revenues (\$000)			Change				Line No.
					Base Rates	Adders ¹	Net Rates	Base Rates	Adders ¹	Net Rates	Base Rates		Net Rates		
					(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(8) - (5)	(11)/(5)	(10) - (7)	(13)/(7)	(14)	
Residential															
1	Residential	4	540,041	5,829,081	\$737,548	\$24,132	\$761,681	\$737,548	\$40,221	\$777,769	\$0	0.0%	\$16,088	2.1%	1
2	Total Residential		540,041	5,829,081	\$737,548	\$24,132	\$761,681	\$737,548	\$40,221	\$777,769	\$0	0.0%	\$16,088	2.1%	2
Commercial & Industrial															
3	Gen. Svc. < 31 kW	23	85,313	1,166,351	\$149,483	\$5,551	\$155,034	\$149,483	\$9,086	\$158,568	\$0	0.0%	\$3,534	2.3%	3
4	Gen. Svc. 31 - 200 kW	28	10,587	2,084,027	\$186,116	\$23,424	\$209,541	\$186,116	\$25,446	\$211,562	\$0	0.0%	\$2,022	1.0%	4
5	Gen. Svc. 201 - 999 kW	30	872	1,325,081	\$105,890	\$13,822	\$119,712	\$105,890	\$14,603	\$120,493	\$0	0.0%	\$782	0.7%	5
6	Large General Service >= 1,000 kW	48	182	6,123,426	\$435,177	\$23,061	\$458,238	\$435,177	\$25,388	\$460,565	\$0	0.0%	\$2,327	0.5%	6
7	Partial Req. Svc. >= 1,000 kW	47	6	32,263	\$4,320	\$121	\$4,441	\$4,320	\$133	\$4,454	\$0	0.0%	\$12	0.5%	7
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	1	0	\$1,219	\$308	\$1,527	\$1,219	\$411	\$1,629	\$0	0.0%	\$103	6.7%	8
9	Agricultural Pumping Service	41	7,913	237,644	\$30,384	(\$2,250)	\$28,134	\$30,384	(\$1,504)	\$28,880	\$0	0.0%	\$746	2.7%	9
10	Total Commercial & Industrial		104,874	10,968,792	\$912,589	\$64,037	\$976,626	\$912,589	\$73,563	\$986,151	\$0	0.0%	\$9,525	1.0%	10
Lighting															
11	Outdoor Area Lighting Service	15	5,703	8,050	\$788	\$275	\$1,063	\$788	\$297	\$1,085	\$0	0.0%	\$23	2.1%	11
12	Street Lighting Service Comp. Owned	51	1,121	21,063	\$2,715	\$1,044	\$3,759	\$2,715	\$1,124	\$3,839	\$0	0.0%	\$80	2.1%	12
13	Street Lighting Service Cust. Owned	53	292	7,519	\$392	\$237	\$629	\$392	\$247	\$639	\$0	0.0%	\$10	1.6%	13
14	Recreational Field Lighting	54	100	1,394	\$88	\$56	\$143	\$88	\$58	\$146	\$0	0.0%	\$2	1.6%	14
15	Total Public Street Lighting		7,215	38,026	\$3,983	\$1,611	\$5,594	\$3,983	\$1,726	\$5,709	\$0	0.0%	\$115	2.1%	15
16	Subtotal		652,131	16,835,899	\$1,654,120	\$89,781	\$1,743,901	\$1,654,120	\$115,509	\$1,769,629	\$0	0.0%	\$25,728	1.5%	16
17	Employee Discount		975	13,481	(\$419)	(\$14)	(\$433)	(\$419)	(\$23)	(\$443)	\$0		(\$9)		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	\$115,486	\$1,772,402	\$0	0.0%	\$25,719	1.5%	20

¹ Excludes effects of the Low Income Bill Payment Assistance Fund (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).

² Percentages shown for Schedules 48 and 47 reflect the combined rate change for both schedules