

January 3, 2024

***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 – Fourth 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.<sup>1</sup> On September 28, 2023, the Company submitted a supplemental filing with a correction to the requested amount and on October 20, 2023, and November 17, 2023, the Company filed additional supplemental filings requesting to extend the effective date ultimately to January 10, 2024. During this period, PacifiCorp has been working with Staff in their review of this filing. Those discussions have led PacifiCorp to revise the requested recovery in this advice letter as detailed below. After reaching an agreement with Staff, PacifiCorp is submitting this fourth supplemental filing to update the request to \$46.50 million. With the change noted in Table 1, this request results in an increase over the Schedule 190 amount currently in rates of \$24.9 million.

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

	4 <sup>th</sup> Supplemental Filing		Revised	Original
	Total Company	Oregon Allocated	Oregon Allocated	Oregon Allocated
Incremental Capital Costs	(2,827,852)	381,783	8,228,691	8,721,806
<b>Annual Revenue Requirement</b>	<b>(238,908)</b>	<b>47,427</b>	<b>877,127</b>	<b>942,580</b>
<b>2022 Outstanding Deferral Balance</b>		<b>27,867,357</b>	<b>27,903,607</b>	<b>27,903,607</b>
<b>2023 Incremental WMP O&amp;M</b>		<b>18,586,716</b>	<b>18,586,716</b>	<b>18,586,716</b>
<b>Total 2023 WMP AAC</b>		<b>46,501,500</b>	<b>47,368,450</b>	<b>47,432,903</b>

<sup>1</sup> 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.

PacifiCorp submits the following updated tariff sheets reflecting this change and respectfully requests to maintain the January 10, 2024 rate effective date requested in its November 17, 2023 supplemental filing.

<b><u>Sheet No.</u></b>	<b><u>Tariff</u></b>	<b><u>Title</u></b>
Thirty-third Revision of Sheet No. INDEX-3	Index	Table of Contents - Schedules
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):

- Attachment A – Calculation of Proposed Rates
- 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 \$24.9 million or 1.4 percent. If approved, a residential customer using 900 kWh per month would see a bill increase of \$2.45 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

Enclosures

## Proposed Tariffs

**+Schedule No.**

<b>SUPPLY SERVICE</b>	
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
<b>ADJUSTMENTS</b>	
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
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

(C)

**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	0.469 ¢ per kWh
Schedule 5	0.469 ¢ per kWh
Schedule 15	2.589 ¢ per kWh
Schedule 23, 723	0.526 ¢ per kWh
Schedule 28, 728	0.202 ¢ per kWh
Schedule 30, 730	0.135 ¢ per kWh
Schedule 41, 741	0.556 ¢ per kWh
Schedule 47, 747	0.085 ¢ per kWh
Schedule 48, 748, 848	0.085 ¢ per kWh
Schedule 51, 751	2.515 ¢ per kWh
Schedule 53, 752	0.317 ¢ per kWh
Schedule 54, 754	0.395 ¢ per kWh

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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)
<b><u>Residential</u></b>								
1	Residential	4	540,041	5,829,081	\$318,437	58.732%	0.469	\$27,338
2	<b>Total Residential</b>		540,041	5,829,081	\$318,437			\$27,338
<b><u>Commercial &amp; Industrial</u></b>								
3	Gen. Svc. < 31 kW	23	85,313	1,166,351	\$71,508	13.189%	0.526	\$6,135
4	Gen. Svc. 31 - 200 kW	28	10,587	2,084,027	\$48,965	9.031%	0.202	\$4,210
5	Gen. Svc. 201 - 999 kW	30	872	1,325,081	\$20,829	3.842%	0.135	\$1,789
6	Large General Service >= 1,000 kW	48	182	6,123,426	\$61,136	11.791%	0.085	\$5,205
7	Partial Req. Svc. >= 1,000 kW	47	6	32,263	\$1,575		0.085	\$27
8	Dist. Only Lg Gen Svc >= 1,000 kW	848	1	270,182	\$1,219		0.085	\$230
9	Agricultural Pumping Service	41	7,913	237,644	\$15,391	2.839%	0.556	\$1,321
10	<b>Total Commercial &amp; Industrial</b>		104,874	11,238,974	\$220,622			\$18,917
<b><u>Lighting</u></b>								
11	Outdoor Area Lighting Service	15	5,703	2,054	\$620	0.114%	2.589	\$53
12	Street Lighting Service Comp. Owned	51	1,121	7,381	\$2,163	0.399%	2.515	\$186
13	Street Lighting Service Cust. Owned	53	292	7,519	\$277	0.051%	0.317	\$24
14	Recreational Field Lighting	54	100	1,394	\$64	0.012%	0.395	\$6
15	<b>Total Public Street Lighting</b>		7,215	18,348	\$3,125			\$268
16	<b>Subtotal</b>		652,131	17,086,403	\$542,184	100.000%		\$46,523
17	Employee Discount		975	13,481	(\$177)		(0.117)	(\$16)
18	<b>Total</b>		652,131	17,086,403	\$542,007			\$46,508

\* 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 <sup>1</sup>	Net Rates	Base Rates	Adders <sup>1</sup>	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)	(5) + (6)	(8) + (9)
<b>Residential</b>															
1	Residential	4	540,041	5,829,081	\$737,548	\$24,132	\$761,681	\$737,548	\$39,754	\$777,303	\$0	0.0%	\$15,622	2.1%	1
2	<b>Total Residential</b>		540,041	5,829,081	\$737,548	\$24,132	\$761,681	\$737,548	\$39,754	\$777,303	\$0	0.0%	\$15,622	2.1%	2
<b>Commercial &amp; Industrial</b>															
3	Gen. Svc. < 31 kW	23	85,313	1,166,351	\$149,483	\$5,551	\$155,034	\$149,483	\$8,969	\$158,452	\$0	0.0%	\$3,417	2.2%	3
4	Gen. Svc. 31 - 200 kW	28	10,587	2,084,027	\$186,116	\$23,424	\$209,541	\$186,116	\$25,383	\$211,500	\$0	0.0%	\$1,959	0.9%	4
5	Gen. Svc. 201 - 999 kW	30	872	1,325,081	\$105,890	\$13,822	\$119,712	\$105,890	\$14,577	\$120,467	\$0	0.0%	\$755	0.6%	5
6	Large General Service >= 1,000 kW	48	182	6,123,426	\$435,177	\$23,061	\$458,238	\$435,177	\$25,266	\$460,443	\$0	0.0%	\$2,204	0.5%	6
7	Partial Req. Svc. >= 1,000 kW	47	6	32,263	\$4,320	\$121	\$4,441	\$4,320	\$133	\$4,453	\$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	\$405	\$1,624	\$0	0.0%	\$97	6.4%	8
9	Agricultural Pumping Service	41	7,913	237,644	\$30,384	(\$2,250)	\$28,134	\$30,384	(\$1,528)	\$28,856	\$0	0.0%	\$722	2.6%	9
10	<b>Total Commercial &amp; Industrial</b>		104,874	10,968,792	\$912,589	\$64,037	\$976,626	\$912,589	\$73,205	\$985,793	\$0	0.0%	\$9,167	0.9%	10
<b>Lighting</b>															
11	Outdoor Area Lighting Service	15	5,703	8,050	\$788	\$275	\$1,063	\$788	\$296	\$1,084	\$0	0.0%	\$22	2.0%	11
12	Street Lighting Service Comp. Owned	51	1,121	21,063	\$2,715	\$1,044	\$3,759	\$2,715	\$1,120	\$3,835	\$0	0.0%	\$76	2.0%	12
13	Street Lighting Service Cust. Owned	53	292	7,519	\$392	\$237	\$629	\$392	\$247	\$639	\$0	0.0%	\$10	1.5%	13
14	Recreational Field Lighting	54	100	1,394	\$88	\$56	\$143	\$88	\$58	\$145	\$0	0.0%	\$2	1.5%	14
15	<b>Total Public Street Lighting</b>		7,215	38,026	\$3,983	\$1,611	\$5,594	\$3,983	\$1,721	\$5,704	\$0	0.0%	\$110	2.0%	15
16	<b>Subtotal</b>		652,131	16,835,899	\$1,654,120	\$89,781	\$1,743,901	\$1,654,120	\$114,680	\$1,768,800	\$0	0.0%	\$24,899	1.4%	16
17	Employee Discount		975	13,481	(\$419)	(\$14)	(\$433)	(\$419)	(\$23)	(\$442)	\$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	<b>Total Sales with AGA</b>		652,131	16,835,899	\$1,656,916	\$89,767	\$1,746,683	\$1,656,916	\$114,657	\$1,771,573	\$0	0.0%	\$24,890	1.4%	20

<sup>1</sup> 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).

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