

August 22, 2025

VIA ELECTRONIC FILING

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

Re: UM 1930 – PacifiCorp's Comments on Staff's Draft Proposal for Expansion of Carveout Capacity

PacifiCorp d/b/a Pacific Power's (PacifiCorp or the Company) respectfully submits these comments in response to Oregon Public Utility Commission Staff's (Staff) draft proposal for expansion of carveout capacity.

Introduction

On May 21, 2025, Staff shared their draft proposal for expansion of Community Solar Program (CSP or Program) carveout capacity and requested comments in response. On June 11, 2025, Staff hosted a workshop, which PacifiCorp participated in, to provide an overview of their proposal. Staff's proposal includes adding an additional 30 megawatts (MW) of carve-out capacity for PacifiCorp and adding an additional 20 MW of carve-out capacity for Portland General Electric (PGE). On Wednesday, August 6, 2025, Staff held an additional workshop to provide additional detail on the methodology used to calculate the cost of 50 MW of proposed expanded capacity. Staff's new estimate is that this expansion would result in approximately \$93 million in additional ratepayer burden. The Company respectfully disagrees with Staff's recommendations and responds to its recommendation below.

I. PacifiCorp opposes the expansion of the carve-out capacity

PacifiCorp remains focused on providing affordable and reliable service to customers. An expansion of the carve-out capacity will result in higher costs for customers and a pass-through of benefits to developers. Staff's August 6, 2025, PowerPoint presentation submitted to this docket demonstrates that the community solar resources are uneconomic when compared to current Public Utility Regulatory Policies Act (PURPA) avoided costs rates and the Energy Trust of Oregon's 2025 savings estimates. PacifiCorp is concerned that expanding the carve-out capacity at current community solar compensation levels will result in impacts to customer affordability that outweigh the benefits a small number of customers would receive.

In the time between the two workshops hosted, Staff increased their calculation of ratepayer impact from \$75 million to \$93 million. Presumably, since 60 percent of the additional carve-out capacity is proposed to be allocated to PacifiCorp service area, 60 percent of the estimated \$93 million ratepayer impact, or roughly \$56 million, will be shouldered by PacifiCorp customers.

This is simply too large of an impact to customers, in particular low-income customers not participating in the Program.

II. If the Program is expanded, PacifiCorp requests that expansion of carve-out capacity use the same approach as provided in Order 17-232.¹

Staff's proposed 30 MW expansion of carve-out capacity in PacifiCorp's service area is based on Staff's estimate of there being 33.1 MW of carve-out-eligible projects in development and 5.9 MW of unallocated carve-out capacity, which leaves 27.2 MW of deficit.

PacifiCorp's initial program capacity of 64.2 MW was based on 2.5 percent of the 2016 Oregon peak load. Using this same approach, but using 2024 Oregon peak load, rather than 2016, would result in a program capacity of 72.7 MW, or an increase of 8.1 MW in program capacity over initial program capacity. The currently proposed increase of 30 MW for PacifiCorp is exorbitantly high.

III. If the Program is expanded, PacifiCorp requests that allocation of carve-out capacity be the representative of utilities' share of load.

Staff fails to provide a satisfactory explanation for why PacifiCorp should expand its capacity by an additional 10 MW compared to PGE. PacifiCorp's 2023 Oregon Peak is 2,924 MW, while that same year PGE experienced a peak of 4,498 MW², representing a 39:61 ratio. Staff's proposed allocation of the carve-out capacity of 30 MW for PacifiCorp and 20 MW for PGE equates to a 60:40 ratio - a flip-flop of the apportionment that matches each utilities' size. Staff's count of interested developers does not justify this inappropriate mismatch. There is no reason why PacifiCorp's customer affordability should be more negatively impacted than PGE from this expansion. At a minimum, this would suggest that Staff's proposed ratio for carve out capacity for the utilities should be swapped. In other words, the burden associated with the required procurement of these uneconomic resources should be proportionally shared by all Oregon ratepayers — and not fall disproportionately on PacifiCorp customers.

Conclusion

For the reasons laid out above, PacifiCorp respectfully requests that the Commission does not adopt the proposed expansion of carve-out capacity and to apply the same treatment to each electric utility in future matters. Thank you for your consideration of this matter.

¹ *In the Matter of Rule Regarding Community Solar Projects*, Docket No. AR 603, Order No. 17-232 (June 29, 2017).

² Portland General Electric, PGE Quick Facts, <https://portlandgeneral.com/about/info/quick-facts>.

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Sincerely,

A handwritten signature in black ink, appearing to read "R. Meredith", with a stylized flourish at the end.

Robert Meredith
Director, Regulation