

February 1, 2024

VIA ELECTRONIC FILING

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

Re: UE 400—PacifiCorp's Motion to Amend Order No. 22-389

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Motion to Amend Order No. 22-389.

If you have any questions about this filing, please contact Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 400

In the Matter of
PACIFICORP d/b/a PACIFIC POWER,
2023 Transition Adjustment Mechanism

**MOTION TO AMEND
ORDER NO. 22-389**
Expedited Consideration Requested

I. INTRODUCTION

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company), consistent with ORS 756.568, respectfully requests the Public Utility Commission of Oregon (Commission) amend Order No. 22-389. Order No. 22-389 directed PacifiCorp to hold a workshop prior to filing the 2025 Transition Adjustment Mechanism (TAM) regarding the execution of a coal supply agreement (CSA) at the Hunter generating facility. PacifiCorp now requests that the Commission modify this order to allow for this workshop to be held before April 1, 2024, instead of the filing date of the 2025 TAM. This modification will allow PacifiCorp to provide TAM parties with the latest information regarding the Company’s fueling plans for the Hunter generating facility in calendar year 2025.

II. BACKGROUND

The TAM is PacifiCorp’s annual filing to update its net power costs in rates and to set the transition adjustments for customers who choose direct access during the open enrollment window in November. On March 1, 2022, PacifiCorp filed its 2023 TAM, which included testimony detailing the level of coal costs included in fuel expense. On August 11, 2022, PacifiCorp, the Staff of the Public Utility Commission of Oregon (Staff), the Citizens’ Utility Board (CUB), the Alliance of Western Energy Consumers (AWEC), Sierra Club, Klamath

Water Users Association/Oregon Farm Bureau Federation (KWUA), Vitesse, LLC, and Calpine Energy Solutions, LLC (Calpine Solutions) filed a settlement resolving all the issues in the 2023 TAM, docket UE 400. On October 25, 2022, the Commission issued Order 22-389 adopting the settlement.¹ Through this order, the Commission required that PacifiCorp hold a workshop:

Due to the complexity of the issues associated with the Hunter CSA, we direct PacifiCorp to hold a workshop with Staff and parties within a reasonable time after PacifiCorp's execution of the CSA and prior to the 2025 TAM.²

III. PROPOSED MODIFICATION

PacifiCorp respectfully requests that the Commission modify Order No. 22-389 to provide for the following:

- 1) Allow PacifiCorp to hold the workshop with parties on the Hunter CSA prior to April 1, 2024 instead of prior to filing the 2025 TAM.

Under the TAM guidelines in a year where PacifiCorp does not file a general rate case, the Company is required to file the TAM by April 1.³ However, the Company is expected to file a general rate case this year and is seeking to file the TAM concurrently with that general rate case on or about February 14, 2024. However, PacifiCorp is also in the process of determining how to fuel the Hunter Generating facility for calendar year 2025 and this process will not be concluded with enough time to schedule and have a workshop with parties prior to February 14, 2024. As a result, the Company is requesting to be able to have the workshop on the same timeline as if the 2025 TAM were a stand-alone TAM filing and

¹ *In the Matter of PacifiCorp, dba Pacific Power, 2023 Transition Adjustment Mechanism*, Docket No. UE 400, Order No. 22-389 at 1 (Oct 25, 2022).

² *Id.* at 7.

³ *In the Matter of PacifiCorp, d/b/a Pacific Power, 2009 Transition Adjustment Mechanism Schedule 200, Cost-Based Supply Service*, Docket No. UE 199, Order No. 09-274, Appendix A at 13 (Jul. 16, 2009) (“If the TAM is filed on a stand-alone basis, it will be filed no later than April 1”).

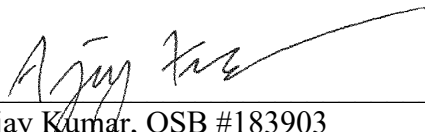
hold the workshop prior to April 1, 2024. This will allow PacifiCorp to provide parties with the latest information regarding fueling the Hunter Generating Facility on a timeline that will still provide sufficient time for parties to review the TAM filing. PacifiCorp has contacted and is authorized to represent that the following parties take no position or do not oppose the modifications proposed in this motion: CUB, AWEC, Sierra Club, KWUA, Vitesse, LLC, and Calpine Solutions. PacifiCorp has contacted Staff and they have indicated support for the motion. Consistent with OAR 860-001-0420, PacifiCorp is requesting expedited consideration and that responses to this motion be filed by February 5, 2024, so that the Commission may issue an order by February 9, 2024.

IV. CONCLUSION

For the reasons described in this motion, PacifiCorp respectfully requests the Commission adopt the modifications to Order No. 22-389 proposed in this filing to hold a workshop on coal supply agreements for the Hunter generating facility by April 1, 2024.

Respectfully submitted this 1st day of February, 2024.

By:



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