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February 25, 2019

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: UM 1810—PacifiCorp's Motion to Amend Order No. 18-075

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Motion to Amend Order No. 18-075.

If you have questions about this filing, please contact Ariel Son at (503) 813-5410.

Sincerely,

Etta Lockey
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1810

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Applications for Transportation
Electrification Programs

**MOTION TO AMEND
ORDER NO. 18-075**

I. INTRODUCTION

PacifiCorp d/b/a PacifiCorp (PacifiCorp) respectfully requests the Public Utility Commission of Oregon (Commission) amend Order No. 18-075 consistent with ORS 756.568. Given the timing of the proceeding, the use of the specific program years 2017–2019 inadvertently truncates the duration of PacifiCorp’s transportation electrification pilot programs. PacifiCorp therefore proposes the following modifications to ensure that the transportation electrification pilot programs are allowed to continue for their full three-year term contemplated by the parties to the proceeding.

II. BACKGROUND

In accordance with Senate Bill (SB) 1547, PacifiCorp filed its initial transportation electrification applications on December 27, 2016, proposing three pilot programs anticipated to accelerate transportation electrification in PacifiCorp’s Oregon service territory. In February 2017, Commission Staff requested additional information to expedite the review process. In response, PacifiCorp filed a supplemental application on April 12, 2017. On May 31, 2017, PacifiCorp hosted a settlement conference where intervening parties expressed support for, concerns with, and suggestions for improvement of various aspects of PacifiCorp’s proposed pilot programs. This resulted in a stipulation that was filed on

August 11, 2017, that resolved all matters in the proceeding (Stipulation). The Commission adopted and modified the Stipulation on February 27, 2018.

Due to the longer-than-expected procedural process in this docket, the use of the specific program years 2017-2019 instead of generic program years one through three in the Stipulation inadvertently truncates the duration of PacifiCorp's transportation electrification pilot programs. Implementation of the order as currently drafted would result in transportation pilot programs with a duration of one year rather than three-year pilot programs as contemplated during the pendency of the proceeding.

III. PROPOSED MODIFICATION

To allow for adequate time to implement PacifiCorp's programs and accommodate data collection for evaluating the programs, PacifiCorp proposes the following modifications to the approved stipulation.¹ The updated language is highlighted in bold:

2. Program expenses will be capped at \$1.85 million during **the first three years** of the pilot period. The Company clarifies that only the Equipment and Installation line item in the proposed budget and a portion of the Program Administration directly attributable to bringing the charging pods into service will be treated as capital expenses. All other program costs will be treated as operations and maintenance (O&M) items.

PacifiCorp proposes that Paragraph 7 of the original Stipulation be modified to read as follows (the updated language is highlighted in bold):

¹*In the Matter of PacifiCorp dba Pacific Power Application for Transportation Electrification Programs*, Docket No. UM 1810 (consolidated), Order No. 18-075, Appendix A (Feb. 27, 2018).

7. Program expenses during the **three-year** pilot period will be capped at \$1.105 million, less a reduction of 50 percent of the Company's initial proposed budgets for Customer Communications and Community Events, which the Stipulating Parties agree will be used as described in item 17 below.

PacifiCorp proposes that Paragraph 9 of the original Stipulation be modified to read as follows (the updated language is highlighted in bold):

9. Program expenses will be capped at \$1.685 million during the **three-year pilot** period. The Company clarifies that all line items in the proposed program expenses are O&M items.

PacifiCorp proposes that Paragraph 21 of the original Stipulation is modified to read as follows (the updated language is highlighted in bold):

21. PacifiCorp will provide progress **updates** on all transportation electrification pilot programs and pilots to the Commission by March 31, 2019 **and March 31, 2020**.

PacifiCorp proposes that Paragraph 22 of the original Stipulation is modified to read as follows (the updated language is highlighted in bold):

22. PacifiCorp will provide a report to the Commission on all pilot activities, including the results of program evaluation activities, by June 30, **2021**.

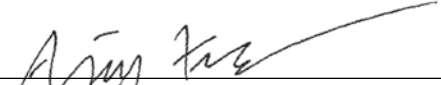
PacifiCorp is authorized to represent that the following parties that signed the stipulation find the modifications acceptable: Staff of the Public Utility Commission of Oregon, Citizens' Utility Board, Siemens, Greenlots, Chargepoint, and Forth. PacifiCorp is unaware of any other party in UM 1810 that opposes this motion.

IV. CONCLUSION

For the reasons described in this motion, PacifiCorp respectfully requests the Commission adopt the modifications proposed in Order No. 18-075 in order to prevent the early truncation of PacifiCorp's transportation electrification pilot programs.

Respectfully submitted this 25th day of February, 2019.

By:



Ajay Kumar
Attorney
PacifiCorp