



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

March 24, 2020

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: UM 1964(2)—PacifiCorp's Supplement to Application for Deferred Accounting for a Balancing Account Related to PacifiCorp's Transportation Electrification Program

PacifiCorp d/b/a Pacific Power submits for filing for reauthorization of its Application for Approval of Deferred Accounting for a Balancing Account Related to PacifiCorp's Transportation Electrification Program.

PacifiCorp respectfully requests that all communications related to this filing be addressed to:

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
oregondockets@pacificorp.com

Matthew McVee
Chief Regulatory Counsel
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
matthew.mcvee@pacificorp.com


Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

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

Sincerely,



Etta Lockey
Vice President, Regulation

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1964(2)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred Accounting
for a Balancing Account Related to PacifiCorp's
Transportation Electrification Program.

**APPLICATION FOR
REAUTHORIZATION OF
DEFERRED ACCOUNTING**

I. INTRODUCTION

In accordance with Oregon Revised Statutes (ORS) 757.259(2)(e) and Oregon Administrative Rules (OAR) 860-027-0300, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) submits this application to the Public Utility Commission of Oregon (Commission) for an order reauthorizing the Company to establish and maintain a balancing account to record the deferral of program costs and revenues related to PacifiCorp's Transportation Electrification Program (TE Program). PacifiCorp proposes to record in the balancing account the costs associated with the TE Program as described in the Company's application filed per OAR 860-087-0030 and approved by the Commission in Order No. 18-075 in docket UM 1810.¹ In addition, PacifiCorp will record in the balancing account the revenue collected from a tariff rider recovering the cost of the TE Program, and the revenue and credits from charging stations and the Oregon Clean Fuels Program related to the TE Program. PacifiCorp previously submitted an application for deferral and request for a balancing account in UM 1964 on July 28, 2028, but the Commission has not yet acted on that filing.

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

II. NOTICE

Communications regarding this application should be addressed to:

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: oregondockets@pacificorp.com

Matthew McVee
Chief Regulatory Counsel
PacifiCorp
825 NE Multnomah Street, Suite 1800
Portland, OR 97232
Email: matthew.mcvee@pacificorp.com

In addition, PacifiCorp requests that all data requests regarding this application be sent to the following:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

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

III. BACKGROUND

In compliance with OAR 860-087-0030, PacifiCorp filed an application proposing approval of programs to accelerate transportation electrification on December 27, 2016, with a supplemental application and supporting testimony filed on April 12, 2017.² PacifiCorp's TE Program is comprised of three pilot programs: the Public Charging Pilot, the Outreach and Education Pilot and the Demonstration and Development Pilot. The Company's proposed TE Program application was approved by the Commission in Order No. 18-075. In its application, PacifiCorp proposed cost recovery of the TE Program through Schedule 95,

² *Id* at 2.

Pilot Program Cost Adjustment, along with the use of a balancing account to track actual costs and revenue collections.

PacifiCorp will be filing a tariff advice filing to implement cost recovery of the TE Program through Schedule 95, Pilot Program Cost Adjustment. The tariff advice filing will note that the rate schedule will operate as a cost-of-service automatic adjustment clause, to allow for adjustments to rates based on actual over- or under-collected amounts. The Company filed a deferral application to obtain approval for the deferred accounting necessary to establish a balancing account to enable the use of a cost-of-service automatic adjustment clause on July 28, 2018 and filed a supplement to its application on March 20, 2020 to clarify that it is only proposing to defer non-capital expenses. PacifiCorp is submitting this request for reauthorization of the deferral application to obtain approval for the deferred accounting necessary to establish a balancing account to enable the use of a cost-of-service automatic adjustment clause.

IV. DEFERRAL OF COSTS

PacifiCorp respectfully requests reauthorization under ORS 757.259(2)(e) to establish and maintain a balancing account to record costs and credits related to the Company's TE Program, along with related interest at the Modified Blended Treasury Rate, consistent with the treatment of interest rates described in Order No. 08-263 as modified by Order No. 10-279.

As required by OAR 860-027-0300(3), PacifiCorp provides the following:

A. Description of Utility Expense

PacifiCorp proposes to continue maintaining a balancing account to record the costs related to its TE Program, the collection of cost recovery through Schedule 95, the collection

of revenues from public charging stations established under the TE Program, the receipt of monetized credits from the Oregon Clean Fuels Program, and related interest. The use of a cost-of-service automatic adjustment clause and balancing account will ensure that PacifiCorp's TE Program cost recovery under Schedule 95 will not under- or over-collect amounts related to the TE Program.

The following costs related to the TE Program were agreed to by stipulating parties and approved by the Commission in UM 1810.

**PacifiCorp TE Program – Total Budget
(\$000s)**

	2017	2018	2019	Total
Public Charging Pilot	\$50.0	\$780.0	\$1,020.0	\$1,850.0
Outreach & Education Pilot	\$177.5	\$330.0	\$330.0	\$837.5
Demonstration & Development Pilot	\$295.0	\$695.0	\$695.0	\$1,685.0
Other [a]	\$57.5	\$105.0	\$105.0	\$267.5
Total	\$580.0	\$1,910.0	\$2,150.0	\$4,640.0

[a] Other includes costs for the attribution model/cost effectiveness framework and a pilot study of system impacts of residential electric vehicles. See Order No. 18-075, Appendix A at 6.

PacifiCorp notes that the Public Charging Pilot total budget includes costs related to charging station equipment and installation and program administration that will be classified as capital expenses.³ As previously discussed, for purposes of this deferral, PacifiCorp is only requesting authorization to defer non-capital related costs.

PacifiCorp notes that at the time of the TE Program application, these costs were anticipated to occur from the fourth quarter of 2017 through the end of 2019. Due to a longer than expected procedural schedule in UM 1810, these costs began to occur in mid-2018. As outlined below, PacifiCorp has incurred the following costs through 2019 and anticipates the following costs will be incurred in 2020.

³ Order No. 18-075, Appendix A at 2.

	2018	2019	2020	Additional Stations	Total
Public Charging Pilot – O&M	\$1,926	\$132,580	\$95,931	\$115,000	\$345,437
Outreach & Education Pilot – O&M	\$4,716	\$390,769	\$609,515		\$1,005,000
Demonstration & Development Pilot	\$8,666	\$215,471	\$1,460,863		\$1,685,000
Other [a] – O&M	\$33,305	\$18,841	\$47,854		\$100,000
Total	\$48,613	\$757,661	\$2,214,163	\$115,000	\$3,135,437

B. Reasons for Deferral

ORS 757.259(2)(e) allows the deferral of identifiable utility expenses in order to minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately the costs borne and received by customers. In this application PacifiCorp seeks the use of a balancing account to match the costs borne and benefits received by customers.

C. Proposed Accounting

If this application is approved, PacifiCorp will record deferred TE Program expense amounts by crediting FERC account 906, Customer Service and Informational Expenses, and debiting the TE Program balancing account, in FERC Account 182.3, Other Regulatory Assets. The deferral balance will be reduced monthly by the amount collected under Schedule 95, recovering TE Program costs. In addition, revenues from public charging stations and monetized credits from the Oregon Clean Fuels Program related to the TE Program will be credited to the proposed TE Program balancing account. A carrying charge calculated at the current Modified Blended Treasury rate will be recorded each month on the deferral balance. If this application is denied, the cost of the TE Program will remain in FERC account 906 and the revenues from public charging stations and monetized credits from the Oregon Clean Fuels Program related to the TE Program will be recorded in FERC account 456, Other Electric Revenues.

D. Estimate of Amounts

Please refer to the estimation of amounts and description of costs in Section A above.

E. Notice

A copy of the Notice of Application and a list of persons served with the notice are attached as Exhibit A to this application.

V. CONCLUSION

PacifiCorp respectfully requests that, in accordance with ORS 757.259(2)(e), the Commission reauthorize the Company to establish and maintain a balancing account related to PacifiCorp's TE Program to record costs, amortization through Schedule 95, charging station revenues, Oregon Clean Fuel Program credits and interest.

Respectfully submitted this 24th day of March, 2020.

By:



Matthew McVee
Chief Regulatory Counsel
PacifiCorp d/b/a Pacific Power

EXHIBIT A
NOTICE
BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1964(2)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Reauthorization of Deferred
Accounting Related to PacifiCorp's Transportation
Electrification Program.

**NOTICE OF
APPLICATION FOR
REAUTHORIZATION OF
DEFERRED ACCOUNTING**

On March 24, 2020, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) filed an application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing the Company to establish and maintain a balancing account to record the deferral of program costs and revenues related to PacifiCorp's Transportation Electrification Programs. The granting of this application will not authorize a change in rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding. To obtain a copy of the application, contact the following:

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: oregondockets@pacificorp.com

Any person who wishes to submit written comments to the Commission must do so within 25 days of the date of PacifiCorp's application.

Respectfully submitted on March 24, 2020.

By:



Matthew D. McVee
Chief Regulatory Counsel