



April 19, 2023

VIA ELECTRONIC FILING

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Docket UE-230172—Refiling PacifiCorp’s General Rate Proceeding

In accordance with communications received from the Administrative Law and Policy Director of the Washington Utilities and Transportation Commission (Commission), PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) submits for filing and approval by the Commission, proposed new tariff sheets applicable to electric service supplied by the Company in the state of Washington. PacifiCorp is refiling the entire March 17, 2023 filing to now include the revisions that were filed on April 4, 2023, in a clean format along with separate redlines to clearly identify changes to revised documents, along with an updated Attachment C index of testimony, exhibits, and workpapers. The proposed new tariff sheets are contained in Exhibit No. RMM-11r accompanying this filing. In accordance with WAC 480-07-510(2), the proposed new tariff sheets are also provided in legislative format.

In accordance with Washington Engrossed Substitute Senate Bill 5295, codified at RCW 80.28.425, PacifiCorp is proposing a two-year rate plan. The filing is based on a historical test period of the 12 months ended June 30, 2022, adjusted for known and measurable changes. Consistent with Commission precedent, the Company’s net power costs are based on the pro forma period of the calendar year 2024, which corresponds to the rate effective period.

By the enclosed tariff sheets, PacifiCorp requests an increase in revenues of approximately \$26.8 million from Washington operations for the first rate year. For the second rate year, the requested increase is approximately \$27.9 million. Under the Company’s proposal, the average residential customer using 1,200 kilowatt-hours per month would see a \$12.11 increase in the first year, followed by a \$9.34 increase in the second year.

A summary of the relief requested, the reasons PacifiCorp is seeking this relief, and an overview of the topics covered by each of PacifiCorp’s witnesses is provided in the pre-filed direct testimony of Matthew D. McVee, Exhibit No. MDM-1T, which is included in this filing. In compliance with WAC 480-07-510(1), the Company has enclosed an original and five paper copies of PacifiCorp’s pre-filed direct testimony and exhibits supporting this general rate case filing. Electronic copies of all files are provided in accordance with WAC 480-07-140(5).

Per the instructions of the Administrative Law and Policy Director of the Commission, PacifiCorp now includes a refiling of the entire March 17, 2023 filing to include the revisions that had been previously filed on April 4, 2023. This filing contains a clean revised version of all the changes that

were previously filed on April 4, and a version of only the pages containing revisions marked in red text with additions underlined (double-underlined for uniform resource locators (URL)) and strikethroughs for deletions. Additionally, PacifiCorp has noted when there were no substantive changes, but simply pagination changes in the testimony. The revised testimony and supplemental exhibits do not alter the Company's rate case in any substantive way.

The revised tariff sheets are contained in Exhibit No. RMM-11r accompanying this filing. In accordance with WAC 480-07-510(2), the proposed new tariff sheets are also provided in legislative format. PacifiCorp's proposed tariff schedules are dated May 19, 2023, as directed.

Here is a brief description of the revised components of this filing:

- Revision sheets for the following witness testimonies:
 - o Ann E. Bulkley—Exhibit AEB-1Tr—replacement pages to include full URLs for publicly available documents, and one replacement page for pagination changes.
 - o Jayson Branch—Exhibit JB-1CTr—replacement pages to include full URLs for publicly available documents, and one replacement page for pagination changes. Please note that the replacement pages do not contain confidential information, and therefore can replace both the confidential and redacted versions.
 - o Nikki L. Koblaha—Exhibit NLK-1Tr—single replacement page to include full URL for a publicly available document.
 - o Ryan D. McGraw—Exhibit RDM-1CTr—replacement table of contents page to include list of supplemental exhibits, replacement pages to include full URLs for publicly available documents, replacement pages to include references to supplemental exhibits, and one replacement page for pagination changes. One page contains confidential information and will be provided in confidential and redacted versions.
 - o Ramon J. Mitchell—Exhibit RJM-1CTr—single replacement page to clarify another state Commission's reference and provide one additional citation.
 - o Rick T. Link—Exhibit RTL-1CTr—replacement table of contents page to include one supplemental exhibit, replacement pages to include full URLs for publicly available documents, one replacement page to include reference to the supplemental exhibit, and replacement pages for pagination changes.
 - o Timothy J. Hemstreet—Exhibit TJH-1CTr—single replacement page to include full URL for a publicly available document. This page contains confidential information and will be provided in confidential and redacted versions.
 - o Thomas R. Burns—Exhibit TRB-1CTr—replacement table of contents page to include list of supplemental exhibits, replacement pages to include full URLs for publicly available documents, replacement pages to include reference to the supplemental exhibits.
- Supplemental exhibits:
 - o Exhibit RDM-2C
 - o Exhibit RDM-3HC
 - o Exhibit RDM-4C
 - o Exhibit RDM-5C

- Exhibit RTL-2
- Exhibit TRB-2
- Exhibit TRB-3C
- Exhibit TRB-4C
- Exhibit TRB-5
- Revised exhibits:
 - Exhibit RMM-11r
- Workpapers refiled
 - Confidential workpapers
 - Non-confidential workpapers
 - Redacted workpapers
 - Workpaper indexes
- Updated Attachment C to include workpaper file names—Workpaper file names were previously only provided separately in individual witness workpaper indexes, but the Company is including all workpaper file names in Attachment C, as directed.
- Updated Attachment D—On April 18, 2022, PacifiCorp submitted its 2022 FERC Form 1. Attachment D was updated to revise the most recently filed FERC Form 1 from 2021 to 2022. (At the time of the Company’s initial filing, the 2021 FERC Form 1 was the most recently filed.)

Many confidential workpapers have been designated confidential in their entirety per WAC 480-07-160(8). These workpapers are large and complex excel spreadsheets that would be either impractical or unduly burdensome to mark as required under WAC 480-07-160(4) through (7).

PacifiCorp has marked certain pages of its filing “DESIGNATED INFORMATION IS CONFIDENTIAL PER WAC 480-07-160.” These documents are protected from any further disclosure by the Commission or the Office of the Attorney General, including their outside experts, under RCW 80.04.095 and WAC 480-07-160.

PacifiCorp requests that the documents contained in the envelopes identified with the cover page marked “DESIGNATED INFORMATION IS CONFIDENTIAL PER WAC 480-07-160,” as well as the files marked “CONFIDENTIAL” or “CONF” on the versions of the USB drives containing confidential materials, be treated as confidential under the provisions of WAC 480-07-160 because they contain sensitive commercial information. In accordance with WAC 480-07-160(5), PacifiCorp has enclosed redacted versions of the documents containing confidential information along with the non-confidential documents in its filing, and has placed unredacted versions of the documents containing confidential information in separate envelopes with corresponding “DESIGNATED INFORMATION IS CONFIDENTIAL PER WAC 480-07-160” labels on the envelopes. Each page of the unredacted version containing confidential information is printed on yellow paper.

PacifiCorp also has designated Exhibit No. RDM-3HC, which is the Build to Transfer Agreement (BTA) for Rock Creek I and II Wind Projects, highly confidential per WAC 480-07-160(6). The Company has previously filed a motion for amended protective order (Motion). As explained in its

Motion, the BTA is commercially sensitive and would provide potential future counterparties a significant commercial advantage at the expense of the Company and its customers.

As required by WAC 480-07-510(4), the Company is providing the supporting workpapers in electronic format on the enclosed USB drives. Certain workpapers and models are being provided as confidential under WAC 480-07-160(3).

As required by WAC 480-07-510(7), the Company has also provided uniform resource locators (URLs) to the following additional documents in Attachment D: the Company's recent FERC Form 1; the Company's Form 10Ks and Form 10Qs; the Company's most recent bond issuance prospectus; and the 2021 Affiliated Interest Report. There are no annual or quarterly reports to shareholders. As noted in the above list, the Company is providing an updated Attachment D to include the newly filed 2022 FERC Form 1.

Attachment A to this letter is the Summary Document prepared in compliance with WAC 480-07-510(5). In compliance with WAC 480-07-510(5)(b), PacifiCorp is serving copies of the Summary Document on the persons listed on the attached Certificate of Service. The Company's pre-filed testimony, exhibits and work papers are available from the Company on request. Attachment B to this letter is a listing of the tariff sheets proposed to be revised. Attachment C is the Printed Index for all electronic files included with this filing. Attachment E is a Supplement to the Company's 2021 Affiliated Interest Report.

In compliance with WAC 480-100-194, PacifiCorp agrees to suspend the proposed tariff filing and thus is not required to publish notice immediately before or coincident with the date of this letter and filing. PacifiCorp agrees to waive the suspension hearing and requests that the Commission issue an order suspending these proposed changes for investigation, and that a hearing to take testimony from the public be scheduled at the prehearing conference. Accordingly, the Company will provide notice to the public under WAC 480-100-197(2). In compliance with WAC 480-100-193(1), PacifiCorp will also post the proposed changes to its tariff sheets for public inspection and review on its website.

PacifiCorp's proposed tariff schedules are dated May 19, 2023. However, PacifiCorp continues to respectfully request a rate effective date of March 1, 2024.

As provided in the non-confidential workpaper titled, "RMM-6-PricingWkpps.xlsx", a typical residential customer using 1,200 kwhs per month would see a bill increase of \$13.39 (or 10.7 percent), effective March 1, 2024, and a bill increase of \$10.20 (or 7.4 percent), effective March 1, 2025. The previous bill impact estimates provided in the Company's initial filing were calculated using a revenue-based method, but the Company is providing updated numbers to reflect total bill impact per guidance from Commission Staff.

Washington Utilities and Transportation Commission

April 19, 2023

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In addition, the Company respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

Please direct any questions to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

/s/
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Enclosures

Attachment A: Summary Document
Attachment B: List of Proposed Tariff Sheets
Attachment C: Index of Electronic Files
Attachment D: Supplemental Documentation
Attachment E: Supplement to PacifiCorp's 2021 Affiliated Interest Report

CERTIFICATE OF SERVICE

I hereby certify that I have this day served **PacifiCorp dba Pacific Power & Light Company's General Rate Case Summary** upon all parties of record in this proceeding, by electronic transmission to the email address(es) of each party or party representative listed in the commission's master service list for this docket.

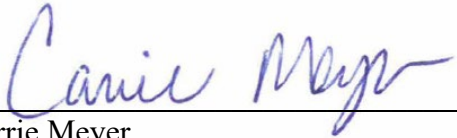
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Dated at Portland, Oregon this 19th day of April, 2023.



 Carrie Meyer
 Adviser, Regulatory Operations