

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP, dba PACIFIC POWER &  
LIGHT COMPANY

Petition for an Order Approving Deferral of  
the Costs Associated with Demand Response  
Programs

DOCKET UE-220848

PACIFICORP'S PETITION FOR  
ACCOUNTING ORDER

**I. INTRODUCTION**

*1* In accordance with WAC 480-07-370(3), PacifiCorp, dba Pacific Power & Light Company (PacifiCorp or Company), petitions the Washington Utilities and Transportation Commission (Commission) for an order authorizing the Company to establish and maintain a balancing account to record the deferral of program costs related to demand response programs approved by the Commission under Schedule 106. PacifiCorp seeks deferral of these costs to track and preserve them for later ratemaking treatment and the benefit of customers.

**II. BACKGROUND**

*2* PacifiCorp is an electric utility and public service company doing business in the state of Washington under RCW 80.04.010, and its public utility operations, retail rates, service, and accounting practices are subject to the Commission's jurisdiction. PacifiCorp also provides retail electricity service under the name Pacific Power in Oregon and California and under the name Rocky Mountain Power in Idaho, Utah, and Wyoming. The Company's principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon, 97232.

3 PacifiCorp’s name and address:

Washington Dockets  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[washingtondockets@pacificorp.com](mailto:washingtondockets@pacificorp.com)

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Phone: (503) 813-5585  
[joseph.dallas@pacificorp.com](mailto:joseph.dallas@pacificorp.com)

In addition, PacifiCorp respectfully requests that all data requests be addressed to:

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

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

Informal inquiries may be directed to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

### **III. THE BASIS FOR REQUESTING DEFERRED ACCOUNTING**

#### **A. Description**

4 In this Petition, PacifiCorp requests Commission authorization to establish and maintain a balancing account for all demand response programs approved by the Commission under Schedule 106. PacifiCorp’s Schedule 106 enables multiple demand response programs that are approved by the Commission, in which eligible customer can participate. These voluntary programs are part of the continuing implementation of resources identified in PacifiCorp’s 2019 Integrated Resource Plan and further outlined in the actions specified in the Clean Energy Implementation Plan. To date, the Commission has approved one demand response program under Schedule 106. On August 25, 2022, the Commission

approved an irrigation demand response program under Schedule 106.<sup>1</sup> On November 16, 2022, PacifiCorp filed for Commission approval of a commercial and industrial demand response program under Schedule 106.<sup>2</sup> The Company will seek amortization of the deferred amount through Schedule 191 in a future Commission proceeding.<sup>3</sup>

5           PacifiCorp anticipates that it will incur costs associated with its demand response programs for its Washington irrigation customers and commercial and industrial customers. These costs will include vendor costs, customer incentives, customer outreach/advertising, evaluation, measurement and verification, and utility staffing directly attributable to managing these programs.

**B.     Proposed Accounting**

6           During the deferral period, PacifiCorp proposes to account for the costs in the following manner. The costs will be deferred in Account 186 – Miscellaneous Deferred Debits. The Company requests that it be allowed to accrue interest on the unamortized balance at the quarterly rate published by the Federal Energy Regulatory Commission (FERC).

**C.     Estimate of Amounts**

7           PacifiCorp estimates the costs associated with PacifiCorp’s demand response program for its Washington irrigation customers to be approximately \$3.633m over five

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<sup>1</sup> In Docket UE-220550, PacifiCorp’s Advice Filing No. 22-03 was approved at the August 25, 2022, Open Meeting.

<sup>2</sup> Docket UE-220848.

<sup>3</sup> In Dockets UE-220550 and UE-220848, the Company indicated its intent to utilize Schedule 191 (System Benefit Charge Adjustment) for the recovery of costs associated with both the Irrigation and Commercial and Industrial demand response programs.

years. The costs will be situs assigned to PacifiCorp's Washington customers. This estimate is based on contract costs with vendors and reflects increased expenditures over time as customer participation increases.

8 PacifiCorp estimates the costs associated with PacifiCorp's proposed commercial and industrial demand response program to be approximately \$10.445m over five years.

#### IV. CONCLUSION

9 PacifiCorp respectfully requests that the Commission authorize the Company to establish and maintain a balancing account to defer costs associated with its irrigation demand response program and commercial and industrial demand response program. PacifiCorp will seek recovery of these deferred costs through Schedule 191 in a future Commission proceeding.

Respectfully submitted this December 16, 2022.

By:



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