

June 14, 2024

UE-240461

**VIA ELECTRONIC FILING**Received  
Records Management  
Jun 14, 2024Jeff Killip  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop S.E.  
P.O. Box 47250  
Lacey, WA 98504-7250**RE: Advice 24-03—Schedule 97 & Schedule 99—2023 Power Cost Adjustment Mechanism—Direct Testimony and Exhibits and Motion for Standard Protective Order**

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) hereby submits to the Washington Utilities and Transportation Commission (Commission) proposed revisions to its electric Schedule 97, Power Cost Adjustment Mechanism Adjustment, and Schedule 99, Production Tax Credit Tracker Adjustment. This filing, made in accordance with RCW 80.28.060, WAC Chapter 480-80 *et. seq.*, and the Commission’s Rules and Regulations, proposes revisions to the following electric tariff sheets.

Fourth Revision of Sheet No. 97.1	Schedule 97	Power Cost Adjustment Mechanism Adjustment
Second Revision of Sheet No. 99.1	Schedule 99	Production Tax Credit Tracker Adjustments

The purpose of this filing is to revise the above-referenced electric schedules in accordance with PacifiCorp’s Power Cost Adjustment Mechanism (PCAM) annual report for the twelve months ended December 31, 2023. PacifiCorp makes this filing in compliance with the Ninth Order in Dockets UE-140762, *et al. (consolidated)*.<sup>1</sup> In the 2015 PCAM Order, the Commission authorized PacifiCorp to implement a PCAM that allows for rate adjustments to account for changes in net power costs (NPC) outside of a band for recovery in base rates. Under the current terms of the PCAM, the Company and its customers share any differences between actual and base NPC, and the Company tracks these differences in a deferral account. A cumulative balance (including monthly interest) in this deferral account greater than \$17 million or less than -\$17 million produces a Schedule 97 price change. The terms of the PCAM, under the settlement stipulation approved by the Commission in the 2015 PCAM Order, establish a 12-month amortization period.<sup>2</sup>

<sup>1</sup> *Wash. Util. & Transp. Comm’n v. Pac. Power & Light Co.*, Docket No. UE-140762, Order 09 at ¶29, ¶35 (May 26, 2015) (hereinafter “2015 PCAM Order”).

<sup>2</sup> *Wash. Util. & Transp. Comm’n v. Pac. Power & Light Co.*, Docket No. UE-140762, PCAM Settlement Stipulation, at ¶18 (May 8, 2015).

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Filed concurrently with this letter is the direct testimony of Jack Painter, along with supporting exhibits and workpapers. During 2023, actual power costs were significantly higher than the baseline, creating an under-recovery of \$87.5 million, as described in the direct testimony of Jack Painter. Under PacifiCorp's PCAM, customers' share of this imbalance (after application of the deadband and asymmetrical sharing bands) is \$72.7 million. Including interest, the total PCAM recovery for the deferral period is \$81.0 million. Over the course of the amortization period, the Company expects to recover a total of \$84.5 million, which includes interest through the 12-month amortization period. This represents a revenue requirement increase of 20.0 percent in overall bills for all customers affected by this tariff change.

Through this filing, the Company also seeks revisions to Schedule 99—Production Tax Credit Tracker Adjustments—to recover approximately \$1.2 million over 12 months.

A typical residential customer on Schedules 16, 17, and 19, using 1,200 kWh per month, would experience an increase of \$23.57 per month or 17.7 percent. Bill assistance programs are available to qualified customers who need help with their energy bills. PacifiCorp customers can go to <https://www.pacificpower.net/my-account/payments/bill-payment-assistance.html> or call 1-888-221-7070 to learn if they are eligible. Payment arrangements are also available.

The tariff sheets described herein reflect an issue date of June 14, 2024, and an effective date of October 1, 2024. PacifiCorp will provide notice of the proposed tariff changes to customers in accordance with WAC 480-100-193 and WAC 480-100-194.

Confidential workpapers are provided to the Commission in accordance with WAC 480-07-160. The confidential workpapers include valuable commercial information, specifically confidential cost and financial information associated with loads and pricing. Disclosure of such information would harm PacifiCorp by an unfair competitive disadvantage. Accordingly, PacifiCorp also includes in this filing a motion requesting that the Commission issue a protective order to govern disclosure of confidential information for use in this case. PacifiCorp is also enclosing redacted versions of confidential files as required by WAC 480-07-160.

It is respectfully requested that all formal correspondence and requests regarding this filing 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 St., Suite 2000  
Portland, Oregon 97232

Please direct informal inquiries to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410, and Daniel Teimouri, Assistant General Counsel, at (503) 813-5817.

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Sincerely,

          /s/            
Matthew McVee  
Vice President, Regulatory Policy and Operations  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
(503) 813-5585  
[matthew.mcvee@pacificorp.com](mailto:matthew.mcvee@pacificorp.com)

Enclosures

NEW-PAC-PCAM-Public-Docs-6-14-24.zip

- NEW-PAC-PCAM-CLtr-6-14-24.pdf
- NEW-PAC-PCAM-Attach-A-6-14-24.pdf (list of tariff sheets)
- NEW-PAC-PCAM-Attach-B-6-14-24.xlsx (tariffs workpaper)
- NEW-PAC-PCAM-Attach-C-6-14-24.pdf (tariff sheets)
- NEW-PAC-PCAM-Mot-PO-6-14-24.pdf
- NEW-PAC-PCAM-Exh-JP-1CT-6-14-24 (R).pdf
- NEW-PAC-PCAM-Exh-JP-2-6-14-24.pdf
- NEW-PAC-PCAM-Exh-JP-2-6-14-24.xlsx
- NEW-PAC-PCAM-Exh-JP-3-6-14-24.pdf
- NEW-PAC-PCAM-Exh-JP-3-6-14-24.xlsx
- NEW-PAC-PCAM-WP1-6-14-24 (R).xlsx
- NEW-PAC-PCAM-WP2-6-14-24.xlsx
- NEW-PAC-PCAM-WP3-6-14-24.xlsx
- NEW-PAC-PCAM-WP4-6-14-24.xlsx

NEW-PAC-PCAM-CONF-Docs-6-14-24.zip

- NEW-PAC-PCAM-Exh-JP-1CT-6-14-24 (C).pdf
- NEW-PAC-PCAM-WP1-6-14-24 (C).xlsx