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August 10, 2021

VIA ELECTRONIC FILING

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Docket UE-152253—PacifiCorp’s Petition to Modify and Extend the Decoupling Mechanism Schedule 93—Decoupling Revenue Adjustment

PacifiCorp dba Pacific Power & Light Company (PacifiCorp) submits the enclosed petition to modify and extend the decoupling mechanism, and proposed tariffs applicable to PacifiCorp’s electric service in the state of Washington in compliance with RCW 80.28.050, WAC Chapter 480-80 et. seq., and the Washington Utilities and Transportation Commission’s (Commission) Rules and Regulations. PacifiCorp respectfully requests an effective date of September 15, 2021.

Third Revision of Sheet No. 93.1	Schedule 93	Decoupling Revenue Adjustment
Second Revision of Sheet No. 93.2	Schedule 93	Decoupling Revenue Adjustment
First Revision of Sheet No. 93.3	Schedule 93	Decoupling Revenue Adjustment

In accordance with Order 12 in this proceeding, the Company submitted its evaluation of the effectiveness of the decoupling mechanism as a compliance filing concurrent with this filing.

In the enclosed petition, PacifiCorp requests to extend the decoupling mechanism beyond the five-year pilot period as originally proposed in this docket. In addition, as discussed in the enclosed petition and evaluation, PacifiCorp is requesting four changes to the decoupling mechanism:

1. Adjustment of the decoupling deferral period and timing of the annual decoupling filings.
PacifiCorp proposes to change the decoupling period to a calendar year to avoid a winter-time rate adjustment and to ease the administrative burden of producing a mid-year commission basis report. As discussed in the evaluation, PacifiCorp proposes that the sixth deferral period begin September 15, 2021, and end December 31, 2022. Each subsequent deferral period would be a calendar year until the decoupling mechanism is discontinued.
2. Removal of Large General Service (Schedule 36) and Agricultural Pumping Service (Schedule 40) from the mechanism.
PacifiCorp recommends removing Schedule 36 and 40 from the mechanism to allow the mechanism to focus on the customer classes with rate designs that have a greater

potential for unstable revenues.

3. Tracking and true-up for all decoupled customers as one class.

PacifiCorp proposes to combine the decoupled classes to reduce rate volatility and further simplify the mechanism.

4. Adjustment of the earnings test.

PacifiCorp proposes to modify the earnings test to be based only on earnings from the decoupled classes to mitigate the impacts of inter-jurisdictional allocation issues that may not accurately reflect PacifiCorp's earnings in Washington.

PacifiCorp is including proposed tariffs as an attachment to the petition, which reflect changes to capture the Company's recommendations.

Please direct all formal correspondence and data requests regarding this filing to:

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

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

Please direct any informal inquiries regarding this filing to Ariel Son at (503) 813-5410.

Sincerely,

/s/

Shelley McCoy
Director, Regulation
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
(503) 813-5292
shelley.mccoy@pacificorp.com

Enclosures

152253-PPL-Pet-to-Modify-8-10-21.pdf
152253-PPL-Attach-A-8-10-21.pdf
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