

March 8, 2017

VIA ELECTRONIC FILING

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

RE: Advice 17-02—Schedule 140—Non-Residential Energy Efficiency

Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits the following proposed tariff sheet applicable to Pacific Power's electric service in the state of Washington in compliance with RCW 80.28.050, WAC Chapter 480-80, and the Washington Utilities and Transportation Commission's (Commission) Rules and Regulations. The Company respectfully requests an effective date of April 28, 2017.

First Revision to Sheet No. 140.1 Schedule 140 Non-Residential Energy Efficiency

The purpose of this filing is to add Street Lighting Service Schedules 51, 52, and 57 to the list of applicable rate schedules in Schedule 140, Non-Residential Energy Efficiency.

The Company offers four street lighting service rate schedules to Washington customers:

- Schedule 51—Street Lighting Service—Company-Owned System
- Schedule 52—Street Lighting Service—Company-Owned System—No New Service. (All street lights installed on and after December 28, 1979 shall make use of high-pressure, sodium-vapor luminaires.)
- Schedule 53—Street Lighting Service—Customer-Owned System
- Schedule 57—Mercury Vapor Street Lighting Service—Company-Owned System—No New Service

Customer-Owned Systems under Schedule 53 are already eligible to receive wattsmart Business incentives under the current Schedule 140 program tariff. The Company proposes to make all street lighting service customers eligible for these same incentives to remove the distinction in program eligibility based on the street light ownership model.

Schedule 51, 52, and 57 customers, who are served by Company-owned street lights, may request that the Company replace functioning existing street lighting systems with Light Emitting Diode (LED) technology. These customer-requested upgrades are performed at the customer's expense. Once the upgrade is complete and the customer is transferred to the appropriate rate on Schedule 51, the customer benefits from lower electric bills. By adding

appropriate rate on Schedule 51, the customer benefits from lower electric bills. By adding Schedules 51, 52, and 57 to the list of applicable rate schedules in Schedule 140, wattsmart Business street/pole lighting retrofit incentives can help address the up-front customer cost barrier to improving efficiency of existing street lighting and encourage more participation.

Schedule 52 and 57 are included in this request since program participation begins when the customer is in the project planning phase (before purchase and installation of new street lights) and at this point they could be on Schedule 52 or 57.¹ By making all street lighting service customers eligible, customers are eligible for the program during the project planning phase as well as after they have been transferred to Schedule 51.

Regional Technical Forum Alignment

Since there are no new or revised measures as part of the proposed changes, a Regional Technical Forum alignment review was not performed.

Cost Effectiveness Analysis

Incentives for LED street lighting are already offered through the program. The proposed change merely expands customer eligibility to receive these incentives and is not expected to materially impact cost-effectiveness.

Transition

If the Commission approves the Company's request, Schedule 51, 52, and 57 customers with incentive offers in place before this filing (offered based on customers' stated plans to purchase the system from the Company and move to Schedule 53) will receive incentives consistent with their incentive offer as long as it remains valid, per wattsmart Business program guidelines.

Stakeholder Involvement

The Company maintains a group of external stakeholders, the Washington Demand-Side Management Advisory Group (Advisory Group), to advise the Company in accordance with WAC 480-109-110. The filing package was provided to the Advisory Group on February 27, 2017.

Request

The Company respectfully requests that the Washington Utilities and Transportation Commission approve the Company's request to modify Schedule 140—Non-Residential Energy Efficiency effective April 28, 2017.

¹ Customers on Schedule 52 or 57 are transferred to Schedule 51 once the upgrade to LED street lighting is complete.

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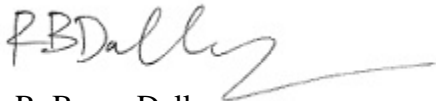
It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to:

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,



R. Bryce Dalley
Vice President, Regulation

Enclosures:

Attachment A—Summary Page of Tariffs

Attachment B—Proposed Electric Service Schedule 140