

May 20, 2021

***VIA ELECTRONIC FILING***

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

Received  
Records Management  
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State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**Re: PacifiCorp's Request for an Exemption of WAC 480-109-130 and Condition 11(d) in Order 01 in Docket UE-190908 and Supporting Documentation.**

PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company), respectfully requests that the Washington Utilities and Transportation Commission (Commission) issue an order approving an exemption for PacifiCorp from the annual requirement to file a revision to its Schedule 191, System Benefits Charge Adjustment, under Washington Administrative Code (WAC) 480-109-130(2) and Condition 11(d) in Order 01 in Docket UE-190908. PacifiCorp also encloses supporting documentation for this Petition as required under WAC 480-109-130(2). The Company consulted with its Demand-Side Management (DSM) Advisory Group during the April 28, 2021 meeting before submitting this letter.

WAC 480-109-130(2) provides:

A utility must make a conservation cost recovery filing no later than June 1<sup>st</sup> of each year, with a requested effective date at least sixty days after the filing. If the utility believes that a filing is unnecessary, then it must file a request for exception and supporting documents no later than May 1<sup>st</sup> of each year demonstrating why a rate change is not necessary.

PacifiCorp's system benefits adjustment mechanism is designed to match future revenue with budgeted expenditures and includes a true-up to reconcile the previous periods' actual DSM expenditures and collections. As of December 31, 2020, the Schedule 191 DSM balance account was approximately \$4.67 million overfunded. However, PacifiCorp is forecasting 2021 costs of approximately \$14.33 million to achieve the higher target for this biennial period and mitigate the COVID-19 impacts which have reduced participation and energy savings. These costs are higher than the \$11.39 million recovered in 2020. The forecasted revenues for 2021 are \$10.56 million based on the current collection rate that is very similar to what was collected in 2020. The Commission has previously approved a similar request from the Company.<sup>1</sup> The combination of the costs that exceed current collections will result in lowering the balance in the account.

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<sup>1</sup> *In the Matter of the Petition of PacifiCorp, d/b/a Pacific Power & Light Company, For an Exemption from WAC 480-109-130 and Extension of Time to File Supporting Documentation*, Docket Nos. UE-190908 et al consolidated, Order No. 2 (May 21, 2020).

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Therefore, PacifiCorp is requesting no revision to Schedule 191 at this time. PacifiCorp is proposing to leave the existing collection rate unchanged through December 31, 2021, review the revenues, expenditures and account balance in January 2022 and, if necessary, propose changes after that.

The Company notified its DSM Advisory Group during the April 28, 2021 meeting of its intention to maintain the current rates.

Based on the foregoing reasons, PacifiCorp respectfully requests that the Commission issue an order approving the Company's request for the current rates related to DSM funding in Schedule 191 and exempting it from WAC 480-109-130 and Condition 11(d) in Order 01 in Docket UE-190908.

It is respectfully requested that all data requests be sent to the following:

By Email (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

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

Sincerely,

/s/

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

Enclosures

NEW-PPL-Request-for-Exemption-WP-5-20-21.xlsx