

December 21, 2021

VIA ELECTRONIC FILING

Amanda Maxwell Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503

RE: Advice 21-13—Schedule 114—Residential Energy Efficiency Rider—Optional for Qualifying Low Income Customers Schedule 118—Home Energy Savings Incentive Program Schedule 140—Non-Residential Energy Efficiency

PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) submits the following proposed tariff sheet applicable to PacifiCorp'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 February 1, 2022.

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Home Energy Savings Incentive
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825 NE Multnomah, Suite 2000 Portland, Oregon 97232



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The purpose of this filing is to make changes to Schedule 114, Residential Energy Efficiency Rider—Optional for Qualifying Low Income Customers, Schedule 118, Home Energy Savings Incentive Program, and Schedule 140, Non-Residential Energy Efficiency.

The changes for Schedule 114, Residential Energy Efficiency Rider—Optional for Qualifying Low Income Customers, are needed to implement the Low Income Weatherization program utility actions identified in the Clean Energy Implementation Plan to be filed by January 1, 2022.

The changes are:

- 1. Permit installation of electric heat to replace permanently installed electric heat, space heaters or any fuel source except natural gas with adequate combustion air as determined by the Agency. The changes are designed to promote the installation of electric heat and minimize use of wood heat, solid fuels or natural draft equipment in specific applications where combustion safety (and indoor air quality) cannot be maintained.
- 2. Definition of "Low Income" will be consistent with RCW 19.405.020 (25).
- 3. The Company currently reimburses 50% of installation cost for ductless heat pumps while MatchMaker funds are available, and 100% when funds are depleted. Financial Assistance Provision 1 clarifies the Company's proposal to reimburse 100% of ductless heat pump related installation costs if not eligible for MatchMaker funds as determined by agencies.
- 4. Increase funds available for repairs from 15% to 30% of the annual reimbursement on energy efficient measures received.
- 5. Provision (2) Agency must qualify residential customers for assistance using the Federal Low Income Guidelines and/or "Low-income" as defined in RCW 19.405.020(25).
- 6. In Provision (3), clarify measures receiving an incentive are not eligible for incentives under other energy efficiency programs but could be eligible for an incentive under another type of program such as Demand Response.

The changes for Schedule 118, Home Energy Savings Incentive Program are:

- 1. Modify the title of Schedule 118 from Home Energy Savings Incentive Program to a more generic title, Residential Energy Efficiency, so the program can be marketed as Wattsmart Homes (or another name) without causing confusion. This change aligns the naming convention for Schedule 118 with Schedule 140.
- 2. Remove the list of eligible rate schedules from the tariff and add this list to the program content managed outside of the tariff and posted on the website. Changes to the list of eligible rate schedules would be made using the existing program change process that includes consulting the Washington DSM Advisory group and posting notice of changes 45 days before the changes take effect. This change will allow the Company to modify the list of eligible rate schedules without requiring a filing.
- 3. In Provision (7), clarify equipment (or services) receiving an incentive is not eligible for incentives under other energy efficiency programs but could be eligible for an incentive under another type of program such as Demand Response.

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The changes for Schedule 140, Non-Residential Energy Efficiency are:

- Remove the list of eligible rate schedules from the tariff and add this list to the program content managed outside of the tariff and posted on the website. Changes to the list of eligible rate schedules would be made using the existing program change process that includes consulting the Washington DSM Advisory group and posting notice of changes 45 days before the changes take effect. This change will allow the Company to modify the list of eligible rate schedules without requiring a filing.
- 2. In Provision 4, clarify equipment (or services) receiving an incentive is not eligible for incentives under other energy efficiency programs but could be eligible for an incentive under another type of program such as Demand Response.
- 3. In Provision 8, modify the fuel switching language to allow incentives for switching from another fuel to electricity and retain the no fuel switching provision from electricity to other fuels. This helps position the program to achieve goals of the Clean Energy Transformation Act.

Stakeholder Involvement

The Company maintains a group of external stakeholders, the Washington Demand-Side Management Advisory Group, to advise the Company in accordance with WAC 480-109-110. The filing was previewed with the Demand-Side Management Advisory Group on June 17, 2021, as well as the Low Income Advisory Group on October 28, 2021. The draft filing was provided to both advisory groups on October 28, 2021.

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

Sincerely,

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

Attachments

Attachment A: List of proposed tariffs Attachment B: Proposed tariffs

Enclosures 21-13-PAC-Attach-A-12-21-21 21-13-PAC-Attach-B-12-21-21