

April 27, 2023

VIA ELECTRONIC FILING

UE-230293

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

Received
Records Management
Apr 27, 2023

Re: PacifiCorp's Request for an Exemption of WAC 480-109-130 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 WAC 480-109-130(2) and Condition 12(d) in Order 01 in Docket UE-210830. 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 March 30, 2023 meeting before submitting this letter.

WAC 480-109-130(2) provides:

A utility must make a conservation cost recovery filing no later than June 1st 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 1st 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 January 31, 2023, the Schedule 191 DSM balance account was approximately \$3.6 million overfunded. However, PacifiCorp is forecasting 2023 costs of approximately \$21.7 million to achieve the higher target for this biennial period and mitigate the COVID-19 impacts which have reduced participation and energy savings. The forecasted revenues for 2023 are \$18.75 million based on the current collection rate set as of August 1, 2022. With forecasted costs that exceed current collections, the Company is projecting the over-collection in the account will reduce to a potential small deficit in 2024 with the same expenditures and revenue projected for 2023 and 2024.

PacifiCorp is requesting no revision to Schedule 191 at this time. PacifiCorp is proposing to leave the existing collection rate unchanged and review the revenues by Q2 of 2024 and, if necessary, propose changes after that.

Washington Utilities and Transportation Commission

April 27, 2023

Page 2

The Company notified its DSM Advisory Group during the March 30, 2023 meeting of its intention to maintain the current rates.

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

By Email (preferred): 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/
Mathew McVee
Vice President, Regulatory Policy and Operations
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232-2152
(503) 813-5585
matthew.mcvee@pacificorp.com

Enclosures

NEW-PAC-SBC-Forecast-Worksheet-2023-2024-4-27-23.xlsx

System Benefits Charge (SBC) Analysis

Washington System Benefit Charge Deferred Account Analysis						
	Monthly Conservation Costs	SBC Recovery	Cash Basis Accumulative Balance	Accrued Costs	Accrual Basis Accumulative Balance	
January	1,218,611	(1,169,025)	(4,306,176)	(175,748)	(3,441,698)	
February	474,721	(1,018,030)	(4,849,485)	332,430	(3,652,577)	
March	1,051,513	(865,600)	(4,663,572)	245,747	(3,220,917)	
April	1,044,018	(783,995)	(4,403,549)	(435,759)	(3,396,653)	
May	1,364,413	(842,006)	(3,881,142)	1,901	(2,872,345)	
June	1,234,250	(651,245)	(3,298,137)	247,254	(2,042,086)	
July	1,064,738	(954,899)	(3,188,298)	(352,284)	(2,284,531)	
August	1,254,329	(1,259,056)	(3,193,025)	(28,509)	(2,317,767)	8/1/2022 effective date
September	626,687	(1,640,391)	(4,206,729)	621,535	(2,709,936)	
October	1,557,646	(1,269,935)	(3,919,018)	(441,795)	(2,864,020)	
November	1,057,043	(1,553,265)	(4,415,240)	220,723	(3,139,519)	
December	1,438,571	(2,033,571)	(5,010,240)	92,490	(3,642,029)	
2022 Totals	13,386,540	(14,041,018)		327,985		
January	2,706,739	(2,166,947)	(4,470,449)	(505,780)	(3,608,017)	Actuals
February	742,341	(1,311,533)	(5,039,641)		(4,177,209)	Forecast
March	1,644,295	(1,115,157)	(4,510,504)		(3,648,071)	
April	1,632,574	(1,010,025)	(3,887,954)		(3,025,522)	
May	2,133,589	(1,084,761)	(2,839,125)		(1,976,693)	
June	1,930,048	(839,002)	(1,748,079)		(885,647)	
July	1,664,975	(1,230,201)	(1,313,305)		(450,873)	
August	1,961,446	(1,622,048)	(973,906)		(111,474)	
September	979,977	(2,113,324)	(2,107,254)		(1,244,822)	
October	2,435,756	(1,636,064)	(1,307,561)		(445,129)	
November	1,652,942	(2,001,079)	(1,655,698)		(793,266)	
December	2,249,553	(2,619,860)	(2,026,004)		(1,163,572)	
2023 Totals	21,734,236	(18,750,000)		(505,780)		
January	1,978,524	(1,561,085)	(1,238,260)		(375,827)	
February	770,751	(1,359,450)	(1,826,958)		(964,526)	
March	1,707,225	(1,155,899)	(1,275,633)		(413,201)	
April	1,695,056	(1,046,926)	(627,503)		234,929	
May	2,215,246	(1,124,392)	463,351		1,325,783	
June	2,003,914	(869,655)	1,597,610		2,460,042	
July	1,728,697	(1,275,147)	2,051,160		2,913,592	
August	2,036,514	(1,681,310)	2,406,365		3,268,797	
September	1,017,482	(2,190,534)	1,233,312		2,095,745	
October	2,528,977	(1,695,837)	2,066,452		2,928,884	
November	1,716,203	(2,074,188)	1,708,466		2,570,898	
December	2,335,648	(2,715,576)	1,328,538		2,190,970	
2024 Totals	21,734,236	(18,750,000)		-		

Note: revenue in the table above has a negative sign; DSM expenditures are positive.