

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP dba PACIFIC POWER &
LIGHT COMPANY

Petition for an Order Approving Deferral
of Approved Rate Increase Beyond Rate
Effective Date.

DOCKET UE-24_____

PACIFICORP’S PETITION FOR
ACCOUNTING ORDER

I. INTRODUCTION

1 In accordance with WAC 480-07-370(3), PacifiCorp dba Pacific Power & Light Company (PacifiCorp or the Company) petitions the Washington Utilities and Transportation Commission (Commission) for an order authorizing the Company to record a regulatory asset for the costs associated with delaying PacifiCorp’s approved rate increase beyond the rate effective date to allow for compliance activities (“Deferred Amount”). On March 19, 2024, the Commission issued an order approving the settlement reached in PacifiCorp’s general rate case with conditions, and authorizing a rate increase.¹ PacifiCorp is seeking to defer the amount of the rate increase beginning with the rate effective date of March 19, 2024, to the date until the rate increase takes effect. This deferral will remain in place until this amount can be appropriately reflected in the Company’s base rates.

II. BACKGROUND

2 PacifiCorp is an electric utility and public service company doing business in the state of Washington under RCW 80.04.010, and its public utility operations, retail rates,

¹ *WUTC v. PacifiCorp d/b/a Pacific Power & Light Co.*, Docket No. UE-230172, Order 08 (March 19, 2024).

service, and accounting practices are subject to the Commission's jurisdiction.

PacifiCorp also provides retail electricity service under the name Pacific Power in Oregon and California and under the name Rocky Mountain Power in Idaho, Utah, and Wyoming. The Company's principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232.

3 PacifiCorp's name and address:

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In addition, PacifiCorp respectfully requests that all data requests be addressed to:

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

By regular mail: Data Request Response Center
PacifiCorp
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Informal inquiries may be directed to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

III. THE BASIS FOR REQUESTING DEFERRED ACCOUNTING

A. Description

4 On March 17, 2023, PacifiCorp filed a general rate proceeding with the Commission seeking approval of a multi-year rate plan.² On May 2, 2023, the Commission issued an order suspending the Company’s tariffs and clarifying that the statutory suspension date “remains March 19, 2024”.³ The statutory suspension date refers to the period under RCW 80.04.130, which allows the Commission to suspend any change in tariff rates “for a period not exceeding ten months from the time the same [rate] would otherwise go into effect.”⁴ This ten-month period combined with the 30-day statutory notice period to the Commission under RCW 80.28.060 results in an 11-month statutory period for the Commission to suspend rates. In PacifiCorp’s previous general rate proceedings, it has traditionally been the practice to allow for a final order with sufficient time for the compliance tariff activities under WAC 480-07-880 to take place.⁵ Consistent with the requirements of the final order, the Company must complete a net power cost update, make various ordered adjustments, and recalculate the revenue requirement and associated rates.⁶ After a compliance filing with revised tariff sheets

² *WUTC v. PacifiCorp d/b/a Pacific Power & Light Co.*, Docket No. UE-230172, Advice No. 23-01 (March 17, 2023).

³ *WUTC v. PacifiCorp d/b/a Pacific Power & Light Co.*, Docket No. UE-230172, Order 01 (May 2, 2023).

⁴ RCW 80.04.130 (1).

⁵ *WUTC v. PacifiCorp d/b/a Pacific Power & Light Co.*, Docket No. UE-191024 (The suspension date was January 1, 2021, the Commission issued the final order on December 14, 2020, PacifiCorp made a compliance filing on December 18, 2020, and Commission acknowledgement of the compliance filing occurred on December 30, 2020); *WUTC v. PacifiCorp d/b/a Pacific Power & Light Co.*, Docket No. UE-130043 (The suspension date was December 11, 2013, Commission issued a final order on December 4, 2013, PacifiCorp filed a compliance filing on December 6, 2013, and Commission acknowledgement of the compliance filing occurred on December 9, 2013); *WUTC v. Pacific Power & Light Co.*, Docket No. UE-111190 (The suspension date was May 31, 2012, the final order was issued March 30, 2012, compliance tariffs had been previously filed with the stipulation, and the Commission accepted the compliance tariffs on April 9, 2012).

⁶ *WUTC v. PacifiCorp d/b/a Pacific Power & Light Co.*, Docket No. UE-230172, Order 08 (March 19, 2024).

containing these revised rates is completed, Washington regulations allow parties five business days to review the filing.⁷ This process is expected to delay the rate effective date beyond the suspension period by an estimated two weeks.

5 The standard for granting an accounting petition is the presence of extraordinary circumstances that: (1) are beyond a Company's control; and (2) cause a material impact.⁸ PacifiCorp does not have control over when the Commission determines it is appropriate to issue an order. In fact, PacifiCorp originally filed the rate proceeding on March 17, 2023, seeking a March 1, 2024 rate effective date.⁹ The parties completed the briefing on February 2, 2022, and the date that the Commission issues an order is out of the Company's control.

6 Any delay to the rate effective date has a material impact on the Company. While the final impact depends on the compliance filing for the power costs that will occur, the weekly impact of a delay based on the numbers known at the time of the Company's filed stipulation is \$265,134.¹⁰ Consistent with both the statutory requirements of the suspension period and the fact that this delay is beyond PacifiCorp's control and has a material impact on the Company, PacifiCorp respectfully requests that the Commission approval this deferral.

⁷ WAC 480-07-880(4).

⁸ *In the matter of Petition of Avista Corporation d/b/a Avista Utilities*, Docket No. UE-200900, Order 01 (October 27, 2022) ("The threshold for approving accounting petitions is the presence of extraordinary circumstances that (1) are beyond a Company's control and (2) cause a material impact. We agree with Staff that the impact to customers here is material and that an erroneously approved level of benefits constitutes a condition currently beyond the Company's control. We also agree that Avista has proposed a fair methodology for returning to customers this over-collection of EIM benefits.").

⁹ *WUTC v. PacifiCorp d/b/a Pacific Power & Light Co.*, Docket No. UE-230172, Advice No. 23-01 (March 17, 2023).

¹⁰ *WUTC v. PacifiCorp d/b/a Pacific Power & Light Co.*, Docket No. UE-230172, Settlement Stipulation at ¶8 (Dec. 15, 2023) (The Company used the \$13,786,955 annual revenue requirement for rate year 1 identified in the Settlement Stipulation and divides by 52).

B. Proposed Accounting

7 If this petition is approved, PacifiCorp will record deferred amounts by debiting
Federal Energy Regulatory Commission (FERC) Account 182.3-Other Regulatory Assets
and crediting the appropriate revenue accounts (FERC Accounts 440 – 444).

C. Estimate of Amounts

8 PacifiCorp estimates (subject to the calculations and updates required by the
Commission) that every week the rate increase is delayed beyond the rate effective date
will result in \$265,134 to the Company. PacifiCorp is seeking to defer these amounts
until they can be appropriately reflected in the Company’s base rates.

IV. CONCLUSION

9 PacifiCorp respectfully requests that the Commission authorize the Company to
defer the costs associated with the compliance activities for the Company’s general rate
proceeding. The Company will address the ratemaking treatment of these costs in a
separate proceeding.

Respectfully submitted this 19th day of March, 2024.

By:



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