

Agenda Date: January 13, 2022
Item Number: D5

Docket: UE-210830
Company: PacifiCorp d/b/a Pacific Power & Light Company

Staff: Joel Nightingale, Regulatory Analyst

Recommendation

Issue an order in Docket UE-210830 accepting PacifiCorp's

- (1) 10-year electric conservation potential of 471,050 megawatt-hours (MWh),
- (2) EIA Target of 94,210 MWh,
- (3) EIA Penalty Threshold of 87,436 MWh, and
- (4) Decoupling Penalty Threshold of 4,711 MWh pursuant to Order 12 in Docket UE-152253,
- (5) subject to the conditions in Attachment A.

Background

On November 1, 2021, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) filed its "2022-2023 Biennial Conservation Plan" (BCP or Plan) with the Washington Utilities and Transportation Commission (Commission) under Docket UE-210830. The electric Plan is required by the Energy Independence Act (EIA).¹

Commission staff (Staff) filed responsive comments on the Plan on December 17, 2021.² Those comments detailed PacifiCorp's expected electric savings in the 2022-2023 biennium, as well as some of the programs the Company will run to achieve those savings and Staff's analysis of the Plan.

PacifiCorp serves approximately 130,000 electric customers in its Washington service territory with the majority located in Columbia, Walla Walla, and Yakima counties.

Discussion

Table 1 compares PacifiCorp's 2022-2023 electric expected savings with expected savings from the 2020-2021 biennium.

¹ RCW 19.285.040(1); WAC 480-109-120(1).

² Docket UE-210830, "Commission Staff Comments Regarding Gas and Electric Utility Conservation Plans Under RCW 19.285 and 80.28 and WAC 480-109 (2022-2023 Biennial Conservation Plans)", filed Dec. 17, 2021.

Table 1. Electric Savings and Budgets from PacifiCorp’s 2020-2021³ and 2022-2023⁴ BCPs

Program	2020-2021 Projected Savings (MWh at Site)	2020-2021 Budget	2022-2023 Projected Savings (MWh at Site)	2022-2023 Budget
Residential Total	29,590	\$10,630,394	24,082	\$21,699,191
<i>Low-income</i>	292	<i>\$1,585,000</i>	338	<i>\$1,981,250</i>
Non-Residential	62,178	\$13,619,913	70,338	\$20,341,392
NEEA	6,198	\$1,673,777	6,773	\$1,724,200
Administration/Other	--	\$2,054,993	--	\$2,072,993
Total Conservation	97,966	\$27,979,077	101,194⁵	\$45,807,776

List of Conditions

As with previous biennia, Staff, the state’s five electric and gas utilities, and various stakeholders have negotiated a set of conditions that PacifiCorp agrees to adhere to throughout the biennium. These are included as Attachment A to this memo.

Stakeholder Comments

In addition to Staff’s comments, three other stakeholders – The Energy Project (TEP), NW Energy Coalition (NVEC), and Public Counsel – also submitted comments on the Plan. Public Counsel recommended approval of the Plan, subject to the conditions noted above; TEP and NVEC were generally supportive of the Plan but did not explicitly recommend approval. Both TEP and NVEC echoed Staff’s concern that the non-energy impact study conducted by the consulting firm DNV was conservative and urged PacifiCorp to engage its Advisory Group proactively and earlier in the process as this research evolves.

TEP noted that PacifiCorp appears to be behind the other electric utilities in undertaking research of energy burden of their low-income customers and encouraged the Company to engage its low-income advisory group as it undertakes this research; Staff agrees with this recommendation.

Conclusion

Staff recommends the Commission issue the order described at the beginning of this memo.

³ Docket UE-190908, “Appendix 2: PacifiCorp’s Washington Demand-Side Management Business Plan For 2020-2021,” Table 1, Page 4, filed Nov. 1, 2019.

⁴ Docket UE-210830, “Appendix 2: Demand-side Management 2022-2023 Business Plan – Washington,” Table 2, Page 5, filed Nov. 1, 2021.

⁵ The difference between this figure and that in Table 1 in Staff’s comments is a small amount of additional savings that PacifiCorp believes it can realize during the 2022-2023 biennium. This additional savings is beyond that which is accounted for in its calculated EIA Target or EIA Penalty Threshold.

Attachment A – Docket UE-210830 Proposed Conditions for 2022-2023 Pacific Power & Light
Company Electric Conservation