BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

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PACIFICORP dba PACIFIC POWER & LIGHT COMPANY

Petition for an Order Approving Deferral of the Costs Associated with Demand Response Programs DOCKET UE-220848

PACIFICORP'S AMENDED PETITION FOR ACCOUNTING ORDER

I. INTRODUCTION

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 to amend the Company's authorization to defer from the date of this petition forward the costs associated with demand response programs the Commission has approved or accepted under Schedule 106. In particular, the Company seeks to update the deferral to reflect the estimates of costs associated with the residential demand response program the Company filed for approval on May 19, 2023.

II. BACKGROUND

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, 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

UE-220848—PacifiCorp's Amended Petition for Accounting Order

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Wyoming. The Company's principal place of business is 825 NE Multnomah Street,

Suite 2000, Portland, Oregon 97232.

PacifiCorp's name and address:

Washington Dockets PacifiCorp 825 NE Multnomah Street, Suite 2000 Portland, OR 97232 washingtondocket@pacificorp.com Joe Dallas Senior Attorney 825 NE Multnomah Street, Suite 2000 Portland, OR 97232 joseph.dallas@pacificorp.com

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 825 NE Multnomah Street, Suite 2000 Portland, OR 97232

Informal inquiries may be directed to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

III. THE BASIS FOR REQUESTING DEFERRED ACCOUNTING

A. Description

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In this Petition, PacifiCorp requests Commission authorization to establish and maintain a balancing account for all demand response programs approved or accepted by the Commission under Schedule 106. PacifiCorp's Schedule 106 enables multiple demand response programs that are approved or accepted by the Commission, in which eligible customer can participate. These voluntary programs are part of the continuing implementation of resources identified in PacifiCorp's 2019 Integrated Resource Plan and further outlined in the actions specified in the Clean Energy Implementation Plan. To date, the Commission has approved or accepted two demand response programs under Schedule 106. On August 25, 2022, the Commission approved an irrigation demand response program under Schedule 106.¹ On January 26, 2023, the Commission accepted a commercial and industrial program under Schedule 106.² The Company will seek amortization of the deferred amounts through Schedule 191 in future Commission proceedings.³

5 PacifiCorp anticipates that it will incur costs associated with its demand response programs for its Washington irrigation customers, commercial and industrial customers, and residential customers. These costs will include vendor costs, customer incentives, customer outreach/advertising, evaluation, measurement and verification, and utility staffing directly attributable to managing these programs.

B. Proposed Accounting

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During the deferral period, PacifiCorp proposes to account for increased regulatory fees by debiting Account 186 – Miscellaneous Deferred Debits. The Company requests that it be allowed to accrue interest on the unamortized balance at the quarterly rate published by the Federal Energy Regulatory Commission (FERC).

C. Estimate of Amounts

PacifiCorp estimates the costs associated with PacifiCorp's demand response program for its Washington irrigation customers to be approximately \$3.633 million over five years.

UE-220848—PacifiCorp's Amended Petition for Accounting Order

¹ In Docket UE-220550, PacifiCorp filed its proposed irrigation demand response program, which was approved at the August 25, 2022, Open Meeting.

² In Docket UE-220848, PacifiCorp filed its proposed commercial and industrial demand response program, which was accepted in that docket on January 26, 2023.

³ In Dockets UE-220550 and UE-220848, the Company indicated its intent to utilize Schedule 191 (System Benefit Charge Adjustment) for the recovery of costs associated with both the Irrigation and Commercial and Industrial demand response programs.

- 8 PacifiCorp estimates the costs associated with PacifiCorp's commercial and industrial demand response program to be approximately \$10.445 million over five years.
- 9 PacifiCorp estimates the costs associated with PacifiCorp's proposed residential demand response program to be approximately \$689,720 over five years.

IV. CONCLUSION

10 PacifiCorp respectfully requests that the Commission authorize the Company to establish and maintain a balancing account to defer costs associated with its irrigation demand response program, commercial and industrial demand response program, and residential demand response program. PacifiCorp will seek recovery of these deferred costs through Schedule 191 in a future Commission proceeding.

Respectfully submitted this 19th day of May, 2023.

By:

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Attorney for PacifiCorp