

November 19, 2015

VIA ELECTRONIC FILING

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504 – 7250

RE: Advice 15-05—Schedule 71—Energy Exchange Program

Pacific Power & Light Company, a division of PacifiCorp (Pacific Power or Company), submits this advice filing to cancel the following tariff sheet in accordance with RCW 80.28.050 and WAC chapter 480-80. The Company respectfully requests an effective date of January 1, 2016.

Eighth Revision of Sheet No. INDEX.3		Tariff Index
<u>CANCEL</u> Original Sheet No. 71.1	Schedule 71	Energy Exchange Program
<u>CANCEL</u> Original Sheet No. 71.2	Schedule 71	Energy Exchange Program
<u>CANCEL</u> Original Sheet No. 71.3	Schedule 71	Energy Exchange Program
<u>CANCEL</u> Original Sheet No. 71.4	Schedule 71	Energy Exchange Program
<u>CANCEL</u> Original Sheet No 71.5	Schedule 71	Energy Exchange Program

Background

On December 12, 2000, Pacific Power submitted Advice 00-012, Schedule 71, Energy Exchange Program, to implement a new program for commercial and industrial customers. The optional program became effective on December 15, 2000, and allowed customers to voluntarily reduce their electricity usage in exchange for a payment at times and prices determined by the Company. To participate in this program a customer had to execute an energy exchange customer agreement with the Company. The Company notified customers who had executed an energy exchange agreement of an exchange event when market prices were such that it was economic for the Company to encourage customers to reduce energy usage. Customers who chose to participate in an exchange event had to maintain their electricity usage below the customer's baseline service for the duration of the specified event.

Schedule 71, Energy Exchange Program was only available to customers with a monthly demand exceeding 1,000 kilowatts at least once during the last twelve-month billing period. If any portion of the customer's load was billed on a daily price option it was not eligible to participate in the program. To be eligible to participate in the program customers had to have a meter which was provided by the Company capable of recording usage intervals no less than 15 minutes and be willing to pay for the costs associated with any load monitoring and communication equipment. These costs were waived if customers participated in the exchange program.

Discussion

The Company offers an Energy Profiler Online (EPO) energy management product to larger commercial and industrial customers to help them monitor and more efficiently manage their energy usage. One piece of the EPO energy management product that the Company has purchased in the past is the load curtailment module. The load curtailment module was included in order to be able to offer Schedule 71 in the event it was needed. The current EPO contract expires at the end of 2015, so the Company has recently completed a request for proposal process and selected Schneider Electric, who is the current EPO provider. For the new agreement with Schneider Electric, the Company proposes to not include a load curtailment module in order to reduce costs of the overall program and benefit all customers served by PacifiCorp.

Due to no customer participation, the expiration of the current EPO contract, and an opportunity to reduce costs the Company is requesting authorization to cancel Schedule 71, Energy Exchange Program. The Company is also submitting filings to cancel this program offering in Oregon, California, Idaho, Utah, and Wyoming.

The Company is providing notice of the proposed change to affected customers in accordance with WAC 480-100-194(2). The customer notice is enclosed as Attachment 1.


It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to:

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

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon, 97232

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

Sincerely,


R. Bryce Dalley
Vice President, Regulation

Enclosures:

Attachment 1: Customer Notice

The proposed tariff sheet to be revised in Pacific Power and Light Company's currently effective Tariff WN U-75 are designated as follows:

Eighth Revision of Sheet No. INDEX.3

Tariff Index

<u>CANCEL</u> Original Sheet No. 71.1	Schedule 71	Energy Exchange Program
<u>CANCEL</u> Original Sheet No. 71.2	Schedule 71	Energy Exchange Program
<u>CANCEL</u> Original Sheet No. 71.3	Schedule 71	Energy Exchange Program
<u>CANCEL</u> Original Sheet No. 71.4	Schedule 71	Energy Exchange Program
<u>CANCEL</u> Original Sheet No. 71.5	Schedule 71	Energy Exchange Program

PACIFIC POWER & LIGHT COMPANY

WN U-75

Eighth Revision of Sheet No. INDEX.3
Canceling Seventh Revision of Sheet No. INDEX.3

Tariff Index

Schedule 73	Renewable Energy Rider - Optional Bulk Purchase Option
Schedule 80	Summary of Effective Rate Adjustments
Schedule 91	Surcharge to Fund Low Income Bill Assistance Program
Schedule 92	Deferral Adjustments
Schedule 95	Renewable Energy Revenue Adjustment
Schedule 96	Renewable Energy Revenue One-Time Credit
Schedule 97	Power Cost Adjustment Mechanism Adjustment
Schedule 98	Adjustment Associated with the Pacific Northwest Electric Power Planning and Conservation Act
Schedule 101	Tax Adjustment Schedule
Schedule 102	Franchise Fee Adjustment Schedule
Schedule 107	Refrigerator Recycling Program - Service Optional for Qualifying Customers
Schedule 114	Residential Energy Efficiency Rider Optional for Qualifying Low Income Customers
Schedule 118	Home Energy Savings Incentive Program
Schedule 130*	Residential Energy Services - Optional for Qualifying Customers
Schedule 135	Net Metering Service
Schedule 136	Interconnection Tariff
Schedule 140	Non-Residential Energy Efficiency
Schedule 191	System Benefits Charge Adjustment
Schedule 300	Charges as Defined by the Rules and Regulations

(D)


NOTE: *No New Service

(continued)

Issued: November 19, 2015
Advice No. 15-05

Effective: January 1, 2016

Issued by Pacific Power & Light Company

By:  R. Bryce Dalley

Title: Vice President, Regulation

Schedule 71
ENERGY EXCHANGE PROGRAM

PURPOSE:

This is an optional, supplemental service that allows participating Customers to voluntarily reduce their electricity usage in exchange for a payment at times and at prices determined by the Company. The Company will notify participating Customers of the opportunity to exchange electricity. The Customer must execute an agreement prior to being allowed to receive service under this rider.

APPLICABLE:

To qualifying Customers with Monthly Demand exceeding 1,000 kW at least once during the last 12-month period. Any portion of the Customer's load that is billed according to a daily price option is not eligible to participate in this program. Participating Customers must execute an Energy Exchange Customer Agreement with the Company.

ENERGY EXCHANGE VALUE:

Market Price Signal:

The Market Price Signal (MPS) is a price or prices quoted by the Company for a specified duration, subject to the following:

A Customer participating in an Exchange Event must maintain electricity usage below the Customer's Baseline Service Level for the duration specified by the MPS offer and accepted by the Customer (the Customer Pledge Period). Upon request the Customer also must provide the Company all documents necessary to demonstrate the Customer's planned operation level for the Pledge Period. Failure to provide detailed documentation upon request for a Customer participating in an Exchange Event shall result in application of the second occurrence of noncompliance specified in Special Condition 10. The MPS shall specify the price for an Exchange Amount and the specified duration during which the quote applies (including days and hours applicable).

Hourly Credit Rate:

Market Price Signal minus Customer's Rate Schedule Effective Energy Price = Hourly Credit Rate (¢/kWh).

The Company will notify Customers of an Exchange Event when the Market Price Signal is such that it is economic for the Company to encourage Customers to reduce usage. The Hourly Credit Rate will be determined by subtracting the energy price the Customer would pay on their otherwise applicable rate schedule from the MPS. This calculation is performed for each hour during the Exchange Event.

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Issued: May 13, 2011

Effective: June 13, 2011

Advice No. 11-01

Issued By Pacific Power & Light Company

By: Andrea Kelly Andrea L. Kelly

Title: Vice President, Regulation

Schedule 71
ENERGY EXCHANGE PROGRAM

ENERGY EXCHANGE VALUE: (continued)

Hourly Credit:

Exchange Amount (kWh) X Hourly Credit Rate = Hourly Credit

The Hourly Credit is the amount owed to the Customer for each hour of curtailment pledged during the Exchange Event. The Hourly Credit is determined by multiplying the Exchange Amount by the Hourly Credit Rate. The Hourly Credit shall not be less than zero.

Exchange Credit:

The Exchange Credit is the amount paid to the Customer for the Exchange Event and is the sum of each Hourly Credit during such event.

PAYMENTS:

The Company will pay the Customer within 45 days of the Exchange Event. At Company's discretion, payment may be applied as a credit to the Customer's Monthly Billing.

EXCHANGE AMOUNT:

The Exchange Amount shall be the difference between the Customer's Baseline Service Level and Customer's measured load for each hour during the term of the Pledge Period. The Customer's Baseline Service Level shall be defined as the average usage for each hour during approximately fourteen typical operational days prior to the Pledge Period. Holidays and weekends will be excluded when determining the Baseline Service Level for non-holiday weekday Exchange Events. The Company may utilize an alternate method to determine Baseline Service Level when the Customer's usage is highly variable or when a prior Exchange Amount has been implemented within the period used to establish a subsequent Baseline Service Level.

RATE SCHEDULE EFFECTIVE ENERGY PRICE:

The Rate Schedule Effective Energy Price shall be the Energy Charge Effective Rate contained in the rate schedule under which the Customer is served.

(continued)

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**Schedule 71
ENERGY EXCHANGE PROGRAM**

NOTIFICATIONS:

The Company will utilize a secured Internet web site as the primary method to notify participants of Exchange Events. Participating customers will notify the Company of their pledge through a method as specified in the Customer Agreement. Other methods of notification may be utilized at the discretion of the Company. Customers must acquire and install any additional communication equipment necessary to receive notification of Exchange Events. The Customer will participate by operating below its Baseline Service Level for the length of the Pledge Period. The communication equipment must be operational as determined by periodic tests performed by the Company or designated agent.

The Company is not obligated to call an Exchange Event, and the Customer is not obligated to exchange energy upon being advised of an Exchange Event. The Company will not be liable for failure to advise a Customer of an Exchange Event.

Notification Options:

The Company reserves the right to cancel an Exchange Event or a portion of an Exchange Event upon notification to the Customer. The Customer shall, at the time of enrollment, advise the Company how many hours' notification it requires prior to a Pledge Period by selecting one of the Notification Options below. Each Notification Option has a corresponding Minimum Hourly Credit Rate, payable to the Customer.

<u>Notification Required Prior to Cancellation</u>	<u>Minimum Hourly Credit Rate</u>
(Option 1) = 2 hours	7¢ per kWh
(Option 2) = 3 hours	5¢ per kWh
(Option 3) = 4 hours	3.5¢ per kWh

ENERGY EXCHANGE CUSTOMER AGREEMENT

The Customer and Company will execute an agreement for the Energy Exchange.

ADJUSTMENTS:

Supplemental adjustment schedules are not applicable to this schedule unless approved by the Washington Utilities and Transportation Commission.

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Issued: May 13, 2011

Effective: June 13, 2011

Advice No. 11-01

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Schedule 71
ENERGY EXCHANGE PROGRAM

SPECIAL CONDITIONS:

1. Metering. The Customer must have a meter provided by the Company, which is capable of recording usage intervals of no less than 15 minutes. The Customer shall provide telephone line access to the meter if requested by the Company. Participation in the Energy Exchange program is subject to meter availability.
2. Communications Equipment. The Customer is required to pay for costs associated with any load monitoring and communications equipment necessary to participate in the Energy Exchange Program. The Company will provide the Customer with access to a secured Internet web site necessary for Exchange Event notification and participation. These charges will be waived for all customers who have participated in an Exchange Event prior to October 31, 2002.
3. Exchange Event and Pledge Period. An Exchange Event may be for one or more consecutive hours, as determined by the Company. More than one Exchange Event may occur in one day. Pledge Period is the hours during an Exchange Event for which the Customer pledges to curtail electricity usage.
4. Notification. The Company is not responsible for any exchange that has not been confirmed and acknowledged by the Company as an Exchange Event.
5. Liability. The Company is not responsible for any consequences to the participating Customer that result from an Exchange Event or the Customer's effort to reduce electricity in response to an Exchange Event.
6. System Emergencies. Where the Company requests load interruptions for a system emergency, the terms of this schedule are not applicable.
7. The purchase of energy from Customers is not permitted under this program. Load from Public Utilities Regulatory Policies Act ("PURPA") qualifying facilities may not be included in this program.
8. Customers participating in this program may not shift load above normal operating levels (approximating the Baseline Service Level) to hours outside the curtailment hours in the Pledge Period, nor may they shift load to other facilities served by the Company or purchase replacement production from another facility served by the Company.
9. Third Party Management. The Company may utilize a third party to provide program management support for this schedule. The Company reserves the right to provide the Customer's energy consumption data to a third party for the purpose of managing this program.

(continued)

Issued: May 13, 2011

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**Schedule 71
ENERGY EXCHANGE PROGRAM**

SPECIAL CONDITIONS: (continued)

- 10. Failure to Comply during an Exchange Event. The Company may take the following action if a Customer pledges, but does not reduce electricity usage per their curtailment pledge during an Exchange Event:
 - 1st occurrence of noncompliance – The Customer shall provide the Company with a written explanation for noncompliance within 21 days at the conclusion of the Exchange Event.
 - 2nd occurrence of noncompliance – The Company will limit the Customer's Baseline Service Level for Exchange Events.
 - 3rd occurrence of noncompliance – The Company will remove the Customer from the Energy Exchange program.

- 11. Early Termination. If the Customer is terminated from this program, the Customer shall be responsible for reimbursing the Company for setup costs associated with enrolling the Customer in this program. Setup costs include, but are not limited to, labor costs associated with enrolling the Customer in this program.

RULES AND REGULATIONS:

Service under this schedule is subject to the General Rules and Regulations contained in the tariff of which this schedule is a part.

CANCELLED

Issued: May 13, 2011
Advice No. 11-01

Effective: June 13, 2011

Issued By Pacific Power & Light Company

By: Andrea Kelly Andrea L. Kelly

Title: Vice President, Regulation

Attachment 1
Customer Notice

Keeping You Informed

Proposed service changes

On November 19, 2015, Pacific Power & Light Company (Pacific Power) submitted an advice filing with the Washington Utilities and Transportation Commission (Commission) to cancel Schedule 107, Refrigerator Recycling Program, and Schedule 71, Energy Exchange Program, effective January 1, 2016.

The Refrigerator Recycling program has been offered to Washington customers as an incentive to recycle older, less-efficient refrigerators and freezers to deliver energy savings. Recent analysis indicates the program is no longer a cost-effective method to deliver energy savings. As a result, Pacific Power is requesting Commission approval to cancel the current program.

The Energy Exchange Program has been offered to Washington large commercial and industrial customers to provide optional load curtailment when needed by the company. Due to the lack of customer participation, Pacific Power is proposing to discontinue offering the service.

You are invited to comment to the Commission by using the "Submit a Comment" feature on the Commission's website at utc.wa.gov, or by using the contact information below. Commission staff will make a recommendation to the commissioners at an open meeting in Olympia. These meetings are scheduled every other Tuesday at 9:30 a.m. Please contact the

Commission to request to be notified of the scheduled open meeting at which the proposal will be considered by the Commission.

You will have an opportunity to comment in person at this meeting. The Commission is committed to providing reasonable accommodation to participants with disabilities. If you need reasonable accommodation, please contact the Commission at 360-664-1132 or human_resources@utc.wa.gov.

If you are unable to attend the open meeting, the Commission has a bridge line that allows you to participate by telephone. Call 360-664-1234 the day before the open meeting for instructions and to sign in.

Washington Utilities and Transportation Commission

1300 S. Evergreen Park Drive SW
P.O. Box 47250, Olympia, WA 98504-7250
Email: comments@utc.wa.gov
Telephone: 1-888-333-WUTC (9882)

For more information on Pacific Power's energy efficiency programs, visit bewattsmart.com. Or to contact Pacific Power, please call us toll free at **1-888-221-7070** or write to:

Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

