



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, Washington 98504-7250

RE: (Compliance Item as listed in Order 09/07/12)
Docket UE-191024, UE-191750, UE-190929, UE-190981, and UE-180778

Dear Mr. Johnson:

On March 26, 2021, PacifiCorp d/b/a Pacific Power & Light Company (“PacifiCorp” or “Company”) filed new and revised tariff sheets as well as “monitoring and reporting plans” for four pricing pilots¹ in response to the Washington Utilities and Transportation Commission’s (Commission’s) Final Order 09/07/12 (Order 09), entered December 14, 2020, in PacifiCorp’s general rate case (UE-191024).² PacifiCorp filed updated tariff sheets on April 19, 2021, to include small corrections and clarifications in tariff language, following conversation with Commission Staff (Staff).³

Order 09 approved the settlement with conditions and required the parties to:

1. Collaborate on appropriate monitoring, reporting, and evaluation protocols.⁴
2. File agreement of these protocols within 90 days of the effective date of Order 09 (March 31, 2021), and
3. Include a report that quantifies the decoupling mechanism’s impact on rates in the data received from the pilot programs.⁵

The Company’s compliance filing, and updated tariffs sheets, represents the culmination of this collaborative process.⁶ Staff has reviewed the compliance filing and updates and believes it addresses both the Commission’s condition and the terms of the settlement. Therefore, Staff recommends the Commission find the Company in compliance with this requirement of Order 09.

¹ The settlement agreed to implement four pricing pilot programs: Time of Use Pilots for Residential Customers, Irrigation Customers, and Non-Residential Customers, and a Customer Autopay and Fee-Free Payment Pilot.

² The general rate case docket, UE-191024, was consolidated with Dockets UE-191750, UE-190929, UE-190981, and UE-180778 in this proceeding, which resulted in a final order denoted Order 09/07/12 to reflect its sequence in the different dockets.

³ There are three corrections and clarification: 1) to more clearly state the different pricing for customer who qualify for low income bill assistance under Schedule 17; 2) add the \$2.00 per month metering fee to Schedule 29, which was mistakenly excluded in the original filing; and 3) revise adjustment sheet tariff schedules to add Schedules 19 and 29

⁴ Order 09/07/12 at ¶ 120.

⁵ Order 09/07/12 at ¶ 121.

⁶ See Appendix A for the complete list of tariff sheet filings and revisions.

Docket UE-191024, UE-191750, UE-190929, UE-190981, and UE-180778
April 22, 2021

PacifiCorp has met the requirements in Order 09. The Company worked collaboratively with interested parties over five months to create the monitoring and reporting plans. These plans have specific measures to evaluate impacts on low-income and vulnerable populations. The time of use plans include customer survey questions to measure impact on equity through the program lifespan.

Regarding the decoupling condition in Order 09, Staff agrees with the Company that addressing the pricing pilots' impact on decoupling should be done in the annual decoupling filings. Doing so will give the Commission more timely information on the interaction with decoupling, as the first preliminary report on the pilots will not be received until May 2023.

Staff extends its gratitude to PacifiCorp, Public Counsel, The Energy Project, Front and Centered, and the Yakima Valley Chapter for the Asian Pacific Islander Coalition for their dedication and contributions to creating the monitoring and reporting plans. Over five months, the parties met numerous times to ensure the plans included thoughtful measures to evaluate the impact on low income and vulnerable populations, and spent a considerable amount of effort designing measures to evaluate equity. The monitoring and reporting plans would not be as thoughtful without the input and contributions of all participants.

Staff recommends the Commission find PacifiCorp in compliance with Order 09/07/12 and authorize the tariff sheets, as updated on April 19, 2021, identified in Appendix A to become effective on May 1, 2021.

Sincerely,

Jason Ball
Deputy Assistant Director, Energy Regulation

Elaine Jordan
Regulatory Analyst, Energy Regulation

Maggie Dunham Jordahl
Regulatory Analyst, Energy Regulation

Docket UE-191024, UE-191750, UE-190929, UE-190981, and UE-180778
April 22, 2021

Appendix A: Tariff Revisions Filed in compliance with Order 09/07/12

New Tariff Sheet	Canceling	Tariff Index
Original Sheet No. 19.1		Schedule 19 Residential Service – Time of Use Pilot
Original Sheet No. 19.2		Schedule 19 Residential Service – Time of Use Pilot
Original Sheet No. 29.1		Schedule 29 Non-Residential Time of Use Pilot
Original Sheet No. 29.2		Schedule 29 Non-Residential Time of Use Pilot
First Revision of Sheet No. 40.1	Original Sheet No. 40.1	Schedule 40 Agricultural Pumping Service
First Revision of Sheet No. 80.1	Original Sheet No. 80.1	Schedule 80 Summary of Effective Rate Adjustments
First Revision of Sheet No. 91.1	Original Sheet No. 91.1	Schedule 91 Surcharge to Fund Low Income Bill Assistance Program
First Revision of Sheet No. 92.1	Original Sheet No. 92.1	Schedule 92 Deferral Adjustments
First Revision of Sheet No. 93.1	Original Sheet No. 93.1	Schedule 93 Decoupling Revenue Adjustment
First Revision of Sheet No. 93.2	Original Sheet No. 93.2	Schedule 93 Decoupling Revenue Adjustment
First Revision of Sheet No. 97.1	Original Sheet No. 97.1	Schedule 97 Power Cost Adjustment Mechanism Adjustment
First Revision of Sheet No. 191.1	Original Sheet No. 191.1	Schedule 191 System Benefits Charge Adjustment
First Revision of Sheet No. 197.1	Original Sheet No. 197.1	Schedule 197 Federal Tax Act Adjustment
First Revision of Sheet No. 300.3	Original Sheet No. 300.3	Schedule 300 Charges as Defined by the Rules and Regulations
First Revision of Sheet No. R10.4	Original Sheet No. R10.4	Rule 10 General Rules and Regulations - Billing