

May 20, 2024

UE-230172

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VIA ELECTRONIC FILING

Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Docket UE-230172—Compliance Filing—2019-2023 Historical Baseline Report on Performance Metrics

In compliance with the Washington Utilities and Transportation Commission's (Commission) Final Order in the above-referenced proceeding, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) submits its historical baseline data for the years 2019-2023 on the performance metrics both agreed upon in settlement or imposed by the Commission.

For administrative clarity on this report and future annual reports, PacifiCorp has numbered the performance metrics as follows:

| # | Performance Metrics | |
|----------------------------|--|--|
| COMMISSION IMPOSED METRICS | | |
| | Total revenue occurring through riders and associated mechanisms not captured in the | |
| CI-1 | MYRP | |
| | Number and percentage of households with a high-energy burden (>6 percent), | |
| | separately identifying known low-income, vulnerable populations, and highly | |
| CI-2 | impacted communities | |
| CI-3 | Average excess burden per household | |
| | Residential arrearages by month, measured by location (zip code) and demographic | |
| | information (known low-income customers, vulnerable populations, highly impacted | |
| CI-4 | communities, and all customers in total) | |
| | Number and percentage of residential electric disconnections for nonpayment by | |
| | month, measured by location (zip code) and demographic information (for known | |
| | low-income, vulnerable populations, highly impacted communities, and all customers | |
| CI-5 | in total) | |
| | Number and percentage of low-income customers who participate in bill assistance | |
| CI-6 | programs | |
| | Percentage of utility energy efficiency program spending that benefits highly impacted | |
| CI-7 | communities and vulnerable populations | |
| | Percentage of utility spending on demand response, distributed energy resources, and | |
| CI-8 | renewable that benefits highly impacted communities and vulnerable populations | |

| | Percentage of utility electric vehicle program spending that benefits highly impacted |
|--------------------------------|---|
| CI-9 | communities or vulnerable populations |
| | Percentage of utility-owned and supported Electric Vehicle Supply Equipment |
| | (EVSE) by use case located within and/or providing direct benefits and services to |
| CI-10 | highly impacted communities and vulnerable populations |
| | Number and location of Public Charging Stations located in highly impacted |
| CI-11 | communities |
| | Percentage of dollars awarded to suppliers self-identifying as owned by people of |
| CI-12 | color, women, and other marginalized groups of total dollars awarded to suppliers |
| | Energy and capacity of load reduced or shifted, and percent of load reduced or shifted, |
| CI-13 | through load management activities conducted through EV tariffs |
| CI-14 | Percentage of known EVSE in load management programs |
| | |
| SETTLEMENT STIPULATION METRICS | |
| S-1 | Washington-Allocated O&M Total Expense divided by Operating Revenue |
| S-2 | Washington-Allocated Operating Revenue divided by AMA Total Rate Base |
| S-3 | Washington-Allocated Operating Revenue divided by EOP Total Rate Base |
| S-4 | Total-Company Current Assets divided by Current Liabilities |
| S-5 | Washington-Allocated Operating Revenues for Return divided by Total Rate Base |
| S-6 | Total-Company Retained Earnings divided by Total Equity |
| S-7 | Average Annual Bill Impacts (by zip code) |
| S-8 | Average Annual Bill divided by Average Median Income (by zip code) |
| S-9 | Average Annual Bill for the Washington Residential Class (by zip code) |
| S-10 | Percentage of LIBA program funding dispersed to Washington Customers |
| S-11 | Washington-Allocated Net-Plant-in-Service per Customer |
| S-12 | Washington-Allocated O&M per Customer |
| | Change in Average Annual Price per Megawatt-Hour for the Residential Class as |
| S-13 | Compared to Inflation |

Further, PacifiCorp provides the following notes for the performance metrics:

CI-2 and CI-3: Mean energy burden estimates for vulnerable populations and highly impacted communities (HICs) are derived from PacifiCorp 2021 Residential Survey, 2023 CETA Public Survey and the 2023 Residential Survey. These surveys did not collect data for 2019 and 2021, therefore data for these years are not available.

In some instances, survey responses for specific vulnerable populations and for HICs are considered to be too limited to provide meaningful results. Therefore, the Company has excluded results for those vulnerable population and HICs with less than 10 survey responses.

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Average Excess Energy Burden is calculated as the difference between energy burden for those who meet the definition of energy burden and the threshold of energy burden, 6%. Only those customers who meet or exceed 6% of their annual household income spent on energy bills are considered for this metric.

CI-4 and CI-5: Known Low-Income (KLI) are those customers who have participated in Low-Income Bill Assistance (LIBA) or have received energy assistance payments over the 2021 to 2022 timeframe. The Company does not store arrearage information prior to 2022, therefore data for 2019 to 2021 is not available.

CI-6: Effective August 1, 2021, the method of calculating the LIBA discount changed from credits applied to usage in excess of 600 kWh to straight percentage discount. Therefore, 2019 and 2020 year end LIBA participant count differ from count of those that received discount. The penetration rate calculation is based on the count of enrolled customers divided by 37,450, which is the number of households with income below 200% of federal poverty level (FPL). Number of households with income below 200% of FPL derived from 2022 PacifiCorp Washington Energy Burden Assessment, which relied on data from 2019 and 2020.

CI-7: Expenditures include the sum of customer incentives, partner/vendor incentives, and (in the case of Low Income Weatherization) direct install costs for energy efficiency projects completed by year. Data for 2019-2022 is based on Washington Department of Health's V1.0 environmental health disparity scores. Data for 2023 is based on either version 1 or version 2 environmental health disparity scores (depending on which data was available at the time the data was pulled into the project record). Census tract is not readily available for a small number of customers, so expenditures for their projects can't be classified and show up only in "all expenditures". The data for 2020 represents current best available data and will be updated in the next CEIP progress report. The Company's CETA DSM utility actions for the Wattsmart Business program have focused on small businesses; the data provided is broken out by small business, the rest of the program and the program total so the small business trend is visible.

Percentage of utility energy efficiency program spending that benefits Vulnerable Populations: 100% of the Low Income Weatherization expenditures benefited the low income Vulnerable Population. Data on other vulnerable populations is not available.

CI-8: PacifiCorp calculated utility spending as the total incentives paid to participants in demand response programs. The Company does not offer any incentive programs for distributed energy resources or renewables. Demand response programs began in 2023, so there is zero spending in 2019 - 2022.

CI-9: PacifiCorp calculated utility spending on utility electric vehicle program spending that benefits highly impacted communities or vulnerable populations that occurred from 2019-2023. A total of 26% of electric vehicle spending occurred in highly impacted communities and vulnerable populations.

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CI-10: PacifiCorp calculated percentage of utility-owned and supported Electric Vehicle Supply Equipment (EVSE) by use case located within and/or providing direct benefits and services to highly impacted communities and vulnerable populations. The use case supported during 2019-2023 was for light-duty vehicles and resulted in 20% of utility-owned and supported EVSE to be located within our providing direct benefits to highly impacted communities and vulnerable populations.

CI-11: PacifiCorp provides the number and location of public charging stations located in highly impacted communities via available information from the Alternative Fuels Data Center (hosted by DOE) and census track information. Total locations in highly impacted communities equals 18. Data provided by the AFDC does not provide data regarding when public charging EVSE stations become operational. Therefore, this information cannot be provided by year.

CI-13: The Company only has one tariff that is applicable specifically to electric vehicles, which is Schedule 45 - Public DC Fast Charger Optional Transitional Rate. Schedule 45 has energy pricing that varies by time of use period. However, only six sites are on this rate schedule, none of which are charging their end-use customers with time varying rates, so the Company therefore assumes that this tariff schedule has not reduced or shifted load.

CI-14: The Company does not have an EVSE load management program that is currently operational. However, the Company anticipates launching a managed charging program for EVs by the end of 2024.

S-2 & S-3: Historical reporting relies on annual commission basis report (CBR) reports submitted in each referenced reporting year. Calendar year 2019-2023 CBRs reported rate base was calculated using a combination methodology, where plant-related (i.e. gross plant and accumulated reserves) rate base balances are reported on an end-of-period (EOP) basis, while all non-plant related rate base balances were reported on an average-of-monthly-average (AMA) basis.

S-8: Median income by zip code data based on Census Bureau Table DP03_0062E for years 2019 to 2022. Census Bureau data for 2023 median income is currently not available. Median income is unavailable from the Census Bureau for all zip codes within PacifiCorp's service area. In those instances where median income is unavailable for a zip code, the average median income across PacifiCorp's service area is used.

The Company respectfully requests that all data requests regarding this matter be addressed to:

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

By regular mail: Data Request Response Center

PacifiCorp

825 NE Multnomah St., Suite 2000

Portland, OR 97232

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Please direct informal questions to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

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Enclosure

230172-PAC-COS-5-20-24.pdf 230172-PAC-Cmpl-Performance-Metrics-5-20-24.xlsx