



UE-240888

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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: Advice 24-06 – Schedule 114 – Residential Energy Efficiency Rider – Optional for Qualifying Low Income Customers**

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp), a division of PacifiCorp, submits the following proposed tariff sheets applicable to PacifiCorp’s electric service in the state of Washington in compliance with RCW 80.28.050, WAC Chapter 480-80, and the Washington Utilities and Transportation Commission’s (Commission) Rules and Regulations. The Company respectfully requests an effective date of January 1, 2025.

Second Revision to Sheet No. 114.2	Schedule 114	Residential Energy Efficiency Rider – Optional for Qualifying Low Income Customers
Third Revision to Sheet No. 114.4	Schedule 114	Residential Energy Efficiency Rider – Optional for Qualifying Low Income Customers

The purpose of this filing is to make changes to Schedule 114, Residential Energy Efficiency Rider – Optional for Qualifying Low Income Customers to add ducted heat pumps. The ducted heat pump measure does not replace the current ductless heat pump measure but provides an additional option or tool that contractors can consider if determined to be an efficient solution for the replacement of permanently installed electric heat system or for fuel conversions for homes with existing ductwork. Ducted heat pump provides whole home solution, consistent, and powerful heating and cooling throughout the entire home. Additionally, ducted heat pump may be a better solution for a home depending on the home’s size, layout, and heating zones.

On December 21, 2021, PacifiCorp filed Advice 21-13 with the Washington Utilities and Transportation Commission (Commission), which included proposed changes to Schedule 114, Residential Energy Efficiency Rider – Optional for Qualifying Low Income Customers, needed to implement utility actions identified in the Clean Energy Implementation Plan. The changes included permitting installation of ductless heat pumps to replace permanently installed electric heat, space heaters or any fuel source except natural gas with adequate combustion air as determined by the Agency. The changes were designed to promote the installation of electric heat and minimize use of wood heat, solid fuels, or natural draft equipment in specific applications where combustion safety (and indoor air quality) cannot be maintained. The

Commission approved changes effective February 1, 2022. Currently, installation of ductless heat pump is the only option offered to replace permanently installed electric heat, space heaters or any fuel source except natural gas with adequate combustion air as determined by the Agency. The additional language to allow for ducted heat pump is just one more tool available to partner agencies and their contractors to help low-income families stay warm, comfortable, and decrease their energy burden.

### **Advisory Group Involvement**

The Company maintains a group of external participants in the Washington Demand-Side Management Advisory Group to advise the Company in accordance with WAC 480-109-110. The proposal for this program change came from stakeholder comments at a joint Demand-Side Management/Equity Advisory Group meeting on September 12, 2024, when PacifiCorp previewed planned program changes for 2025. The draft filing was provided to both advisory groups on October 7, 2024.

### **Request**

The Company respectfully requests that the Washington Utilities and Transportation Commission approve the Company's request to modify Electric Service Schedule No. 114 – Residential Energy Efficiency Rider – Optional for Qualifying Low Income Customers effective January 1, 2025, including information contained in Attachment A.

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

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

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

Sincerely,

          /s/          

Matthew McVee  
Vice President, Regulation Policy and Operation  
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Enclosures/Attachments

NEW-24-06-PAC-Attach-A-11-18-24

NEW-24-06-PAC-Attach-B-11-18-24