

Agenda Date: October 27, 2022
Item Number: A1

Docket: UE-220359
Company: PacifiCorp d/b/a Pacific Power & Light Company

Staff: Andrew Rector, Regulatory Analyst

Recommendation

Direct the secretary to issue a letter acknowledging the 2022 PacifiCorp Transportation Electrification Plan, pursuant to RCW 80.28.365.

Background

On May 20, 2022, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) filed its 2022 “Washington State Transportation Electrification Plan” (TEP or Plan) with the Washington Utilities and Transportation Commission (Commission) under Docket UE-220359. PacifiCorp supplemented its original filing with an addendum filed on September 28, 2022. This is PacifiCorp’s first filed TEP since enabling legislation was enacted in 2019. The Commission is required to acknowledge a TEP within six months of its filing.¹

PacifiCorp serves more than 137 thousand electric customers in six Washington counties.

PacifiCorp’s Transportation Electrification Plan

The TEP outlines the Company’s planned transportation electrification activities and expenditures from 2023 through 2027. The Company intends to spend approximately \$3.5 million in capital expenditures across nine “strategy” areas. These programs and the related activities are described in Commission staff’s (Staff) responsive comments, filed on October 7, 2022, and included as Attachment 1 to this memo. Staff’s comments also offered several recommendations to PacifiCorp as it implements its TEP programs, including:

- Provide the following information as part of its first transportation electrification (TE) report filed in this docket:
 - An update on the Company’s investigation into load management opportunities beyond TOU rates;
 - An update on how the Company has implemented programs equitably as described in Staff’s comments (Attachment 1);
 - A description of how the Company has implemented the public outreach changes recommended in Staff’s comments and include a public outreach update;
- File further periodic reports in this docket, with metric tracking, as outlined in Staff’s comments.

¹ RCW 80.28.365(3).

Interested Person(s) or Party(ies) Outreach

In response to its July 28, 2022, Notice of Opportunity to Comment, the Commission received three sets of comments, including those from Staff, Public Counsel, and the NW Energy Coalition (NWEC).

Public Counsel expressed its belief that the plan meets statutory provisions. It also encouraged PacifiCorp to continue to engage its Equity Advisory Group² (EAG) on how to reach multifamily customers and suggested considering a pilot project aimed at this segment. Finally, Public Counsel encouraged the Company to participate in ongoing initiatives at the federal and state level to develop rules and encourage electric vehicle (EV) adoption, adjusting its plan as necessary and offering updates to interested parties along the way.

NWEC made numerous recommendations in its comments, including that PacifiCorp should:

- Provide an updated forecast with each of its TE reports.
- Incorporate updated Department of Ecology rules into its baseline forecast assumptions and comply with new rules promulgated by the Department of Agriculture.
- Forecast medium- and heavy-duty truck adoption in its service territory.
- Integrate its EV forecast into its integrated resource planning process.³
- Explore additional payment methods, language options, and Americans with Disabilities Act (ADA) design standards into its public electric vehicle supply equipment.
- Work with its EAG to develop a multifamily housing pilot program.
- Include in its subsequent reporting numerous metrics, such as updated EV registration and forecast data, load shapes for different customer segments, load and distribution grid impacts, expenses to date, progress towards implementing the programs in the plan, and other metrics consistent with either or both of those proposed in Puget Sound Energy's pending general rate case settlement (PSE GRC)⁴ or outlined in Oregon Public Utilities Commission (OPUC) Order No. 22-314.⁵
- Provide a comparison of proposed expenditures to the 0.25 percent annual revenue requirement limit defined in RCW 80.28.360(1).

Staff response: Staff believes that the recommendations made by Public Counsel and NWEC are reasonable. PacifiCorp must comply with all current and future regulations governing its

² WAC 480-100-655(1)(b).

³ RCW 19.280.030(1)(m).

⁴ Dockets UE-220066/UG-220067/UG-210918 (consolidated), "Settlement Stipulation and Agreement on Revenue Requirement and All Other Issues Except Tacoma LNG and PSE's Green Direct Program" (August 26, 2022).

⁵ Oregon Public Utility Commission Docket UM 2165, "In the Matter of Public Utility Commission of Oregon, Investigation of Transportation Electrification Investment Framework" (August 26, 2022), accessed from: <https://apps.puc.state.or.us/orders/2022ords/22-314.pdf>.

transportation electrification work. The Company's EV adoption and electric load forecasts should include electrification of medium- and heavy-duty vehicles, as adoption of such vehicles could have significant impacts on the electric grid. A pilot program for the multifamily sector may be warranted and should be considered; in doing so, PacifiCorp should review similar programs being run across the country. PacifiCorp should also consider ADA design standards when planning its public charging stations. Staff agrees that PacifiCorp should provide a comparison between its proposed spending and the 0.25 percent annual revenue requirement limit defined in statute.

Regarding reporting metrics, Staff believes that the metrics outlined in its comments track very closely with those proposed by NWECA as well as those in the PSE GRC settlement and OPUC order. Staff does not recommend any specific changes to the list it provided in comments at this time but notes that reporting metrics could evolve as PacifiCorp implements its TEP.

Conclusion

Staff recommends that the Commission issue a letter acknowledging PacifiCorp's TEP.