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February 18, 2025

Via UTC Web Portal

Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Sq. Loop SE
P. O. Box 47250
Lacey, Washington 98503

Re: Washington Utilities & Transportation Commission v. PacifiCorp d/b/a Pacific Power & Light Company, Multiyear Rate Plan Annual Report, Docket UE-230172

Dear Jeff Killip:

The Energy Project (TEP) submits these comments on PacifiCorp's multiyear rate plan annual report. TEP agrees with the comments of Public Counsel and the Commission Staff that the Commission should order PacifiCorp to issue a refund to customers for the Foote Creek Wind II-IV Repower Project. TEP signed the Settlement agreement in this case with the understanding that if PacifiCorp did not spend its full budget for any project excluded from the portfolio review, including new wind, refunds would flow to customers for the realized cost savings. Now that PacifiCorp completed the Foote Creek Wind Project under budget, customers are entitled to these savings.

Further, TEP is concerned that PacifiCorp's residential customers are facing skyrocketing rates. The bill impacts of the rate increases in this multiyear rate plan (MYRP), when combined with the costs of PacifiCorp's 2022 and 2023 Power Cost Adjustment Mechanisms (PCAMs), constitute rate shock. TEP's analysis, provided in Table 1 below, shows that **the rate increases authorized by the Commission between April 2024 and April 2025 will increase PacifiCorp's average residential customer monthly bill by approximately \$45.40 or 37%**. A \$45 monthly bill increase in one year is untenable for moderate income customers, let alone the low-income Washingtonians most in need.

Table 1: Rate Impacts for Average Residential Customers Using 1,200 kWh

Month	Case	Monthly Bill Increase	Amortization Period, if any	Total Monthly Bill
				\$122.65
April 2024	MYRP Year 1	\$4.84 or 3.9%		\$127.48
November 2024	2022 PCAM ¹	\$11.71 or 9.0%	24 months	\$141.14
February 2025	2023 PCAM ²	\$24.70 or 17.5%	12 months	\$161.98
April 2025	MYRP Year 2 ³	\$6.07		Approx. \$168

The Commission should provide customers any relief that it can, including by passing the Foote Creek Wind cost savings on to customers as contemplated in the Settlement. Further, TEP finds the Commission’s observations in the 2022 PCAM Order concerning the high price of market power and the advantage of acquiring resources⁴ prescient considering the significant cost savings provided by Foote Creek and other inexpensive renewable resources.

Very truly yours,

/s/ Yochanan Zakai
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cc: Service List (email only)

¹ PacifiCorp 2022 Power Cost Adjustment Mechanism, Dtk. UE-230482, Order 07 Approving 2022 PCAM (Oct. 30, 2024).

² PacifiCorp 2023 Power Cost Adjustment Mechanism, Dtk. UE-240461, Order 02 Approving and Adopting Settlement Agreement (Jan. 28, 2025).

³ Order 08/06 Rejecting Tariff Sheets; Approving Settlement with Conditions; Authorizing and Requiring Compliance Filing, at 2 (March 19, 2024).

⁴ PacifiCorp 2022 Power Cost Adjustment Mechanism, Dtk. UE-230482, Order 07 Approving 2022 PCAM (Oct. 30, 2024).