

May 1, 2020

VIA ELECTRONIC FILING

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
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05/01/20 16:37
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: PacifiCorp's Request for an Exemption of WAC 480-109-130 and Condition 11(d) in Order 01 in Docket UE-190908 and One-Week Extension for Supporting Documentation.

PacifiCorp dba Pacific Power (PacifiCorp or Company), respectfully requests that the Washington Utilities and Transportation Commission (Commission) issue an order approving an exemption for PacifiCorp from the annual requirement to file a revisions to its Schedule 191, System Benefits Charge Adjustment, under Washington Administrative Code (WAC) 480-109-130(2) and Condition 11(d) in Order 01 in Docket UE-190908. Additionally, PacifiCorp requests that the Commission grant the Company a one-week extension to provide the supporting documentation for this Petition as required under WAC 480-109-130(2). The Company has consulted with Commission Staff before submitting this letter.

WAC 480-109-130(2) provides:

A utility must make a conservation cost recovery filing no later than June 1st of each year, with a requested effective date at least sixty days after the filing. If the utility believes that a filing is unnecessary, then it must file a request for exception and supporting documents no later than May 1st of each year demonstrating why a rate change is not necessary.

PacifiCorp's system benefits adjustment mechanism is designed to match future revenue with budgeted expenditures and includes a true-up to reconcile the previous periods' actual DSM expenditures and collections. As of December 31, 2019, the Schedule 191 DSM balance account was approximately \$3.719 million overfunded. However, PacifiCorp is forecasting 2020 costs of approximately \$13.34 million to achieve the higher target for this biennial period. These costs are higher than the \$9.393 million expended in 2019. The forecasted revenues from the company's 2019 adjustment was \$10.782 million,¹ which the company's expects to trend lower because of the impact from the COVID-19 pandemic. The combination of the expected higher costs and lower revenue will result in lowering the balance in the account.

Therefore, PacifiCorp is requesting no revision to Schedule 191 at this time. PacifiCorp is proposing to leave the existing collection rate unchanged through August 31, 2020, review the

¹ UE-180493

revenues, expenditures and account balance in September 2020 and, if necessary, propose changes after that.

Further, keeping the rate unchanged will also help to minimize the number of rate changes customers could see during the COVID-19 pandemic.

The Company notified its DSM Advisory Group on Friday, May 1, 2020, of its intention to maintain the current rates.

Based on the foregoing reasons, PacifiCorp respectfully requests that the Commission issue an order approving the company's request for the current rates related to DSM funding in Schedule 191 and exempting it from WAC 480-109-130 and Condition 11(d) in Order 01 in Docket UE-190908. The Company also requests that the Commission grant the Company a one week extension to file supporting documentation.

It is respectfully requested that all data requests be sent to the following:

By Email (preferred): datarequest@pacificorp.com

By Regular Mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

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

Sincerely,

[SIGNATURE BLOCK]

Enclosures