

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP dba PACIFIC POWER &  
LIGHT COMPANY

Petition for an Order Approving Deferral of  
the Costs Associated with Demand Response  
Programs

DOCKET UE-220848

PACIFICORP'S AMENDED PETITION  
FOR ACCOUNTING ORDER

**I. INTRODUCTION**

*1* In accordance with WAC 480-07-370(3), PacifiCorp dba Pacific Power & Light Company (PacifiCorp or the Company) petitions the Washington Utilities and Transportation Commission (Commission) for an order to amend the Company's authorization to defer from the date of this petition forward the costs associated with demand response programs the Commission has approved or accepted under Schedule 106. In particular, the Company seeks to update the deferral to reflect the estimates of costs associated with the battery demand response program the Company filed for approval on November 20, 2024.

**II. BACKGROUND**

*2* PacifiCorp is an electric utility and public service company doing business in the state of Washington under RCW 80.04.010, and its public utility operations, retail rates, service, and accounting practices are subject to the Commission's jurisdiction. PacifiCorp also provides retail electricity service under the name Pacific Power in Oregon and California and under the name Rocky Mountain Power in Idaho, Utah, and

Wyoming. The Company's principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232.

3 PacifiCorp's name and address:

Washington Dockets  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
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In addition, PacifiCorp respectfully requests that all data requests be addressed to:

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

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

Informal inquiries may be directed to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

### **III. THE BASIS FOR REQUESTING DEFERRED ACCOUNTING**

#### **A. Description**

4 In this Petition, PacifiCorp requests Commission authorization to establish and maintain a balancing account for all demand response programs approved or accepted by the Commission under Schedule 106. PacifiCorp's Schedule 106 enables multiple demand response programs that are approved or accepted by the Commission, in which eligible customer can participate. These voluntary programs are part of the continuing implementation of resources identified in PacifiCorp's 2019 Integrated Resource Plan and further outlined in the actions specified in the Clean Energy Implementation Plan. To date, the Commission has approved or accepted three demand response programs under

Schedule 106. On August 25, 2022, the Commission approved an irrigation demand response program under Schedule 106.<sup>1</sup> On January 26, 2023, the Commission accepted a commercial and industrial program under Schedule 106.<sup>2</sup> Additionally, on June 29, 2023, the Commission accepted a residential demand response program under Schedule 106.<sup>3</sup> The Company will seek amortization of the deferred amounts through Schedule 191 in future Commission proceedings.<sup>4</sup>

5 PacifiCorp anticipates that it will incur costs associated with its demand response programs for its Washington irrigation customers, commercial and industrial customers, and residential customers. These costs will include vendor costs, customer incentives, customer outreach/advertising, evaluation, measurement and verification, and utility staffing directly attributable to managing these programs.

## **B. Proposed Accounting**

6 During the deferral period, PacifiCorp proposes to account for increased regulatory fees by debiting Account 186 – Miscellaneous Deferred Debits. The Company requests that it be allowed to accrue interest on the unamortized balance at the quarterly rate published by the Federal Energy Regulatory Commission (FERC).

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<sup>1</sup> In Docket UE-220550, PacifiCorp filed its proposed irrigation demand response program, which was approved at the August 25, 2022, Open Meeting.

<sup>2</sup> In Docket UE-220848, PacifiCorp filed its proposed commercial and industrial demand response program, which was accepted in that docket on January 26, 2023.

<sup>3</sup> In Docket UE-220848, PacifiCorp filed its proposed commercial and industrial demand response program, which was approved at the January 26, 2023.

<sup>4</sup> In Dockets UE-220550 and UE-220848, the Company indicated its intent to utilize Schedule 191 (System Benefit Charge Adjustment) for the recovery of costs associated with both the Irrigation and Commercial and Industrial demand response programs.

**C. Estimate of Amounts**

7 PacifiCorp estimates the costs associated with PacifiCorp’s demand response  
program for its Washington irrigation customers to be approximately \$3.633 million over  
five years.

8 PacifiCorp estimates the costs associated with PacifiCorp’s commercial and industrial  
demand response program to be approximately \$10.445 million over five years.


9 PacifiCorp estimates the costs associated with PacifiCorp’s proposed residential demand  
response program to be approximately \$689,720 over five years.

10 PacifiCorp estimates the costs associated with PacifiCorp’s battery demand response  
program to be approximately \$491,250 over three years.

**IV. CONCLUSION**

11 PacifiCorp respectfully requests that the Commission authorize the Company to  
establish and maintain a balancing account to defer costs associated with its irrigation  
demand response program, commercial and industrial demand response program,  
residential, and battery demand response program. PacifiCorp will seek recovery of these  
deferred costs through Schedule 191 in a future Commission proceeding.

Respectfully submitted this 20<sup>th</sup> day of November, 2024.

By:   
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