

PACIFICORP
DRAFT WASHINGTON CLEAN ENERGY IMPLEMENTATION PLAN
DOCKET UE-210829
INITIAL COMMENTS OF THE ENERGY PROJECT
December 3, 2021

I. INTRODUCTION

1 The Energy Project (TEP) provides these initial comments regarding PacifiCorp’s Draft
Clean Energy Implementation Plan (CEIP) in Docket UE-210829. Our comments are primarily
focused on the Customer Benefit Indicators (CBIs) and Specific Actions sections of the Draft
CEIP. We appreciate the opportunity to share feedback with the Company and stakeholders.

2 The Draft CEIP is a rather lengthy document that includes several appendices. The
Energy Project’s review of these materials is ongoing, and therefore additional issues of concern
may arise as this process continues and we review comments of other stakeholders.

II. COMMENTS

A. Customer Benefit Indicators

3 The Energy Project joined with Front and Centered, the Northwest Energy Coalition, and
the Public Counsel Unit of the Washington Attorney General’s Office to develop a draft list of
Customer Benefit Indicators (CBIs). The Joint Advocates (JA) initially shared this list with the
Company and stakeholders in late July 2021 and have subsequently filed the list in this docket.

4 **Organization:** PacifiCorp’s Draft CEIP outlines the CBIs at Table 2.3.¹ One confusing aspect of this table is that multiple statutory elements are often indicated for a given CBI. For example, “non-energy benefits” is referenced for four of the nine CBIs. In contrast, the statutory elements “energy security” and “energy resiliency” are shown as pertaining to only a single CBI. The Company indicates this modification to the organization of the CBIs was made later in the process, after reviewing Avista’s draft CEIP. We recognize that some degree of overlap certainly exists, but TEP believes this structure creates unnecessary confusion. Ultimately, it is important to make sure that each statutory element receives equal weight and consideration within the CBIs. For clarity, we recommend a structure along the lines of the Joint Advocates’ CBIs, whereby the CBIs are organized around a single statutory element.

5 **Weighting Process:** PacifiCorp undertook a weighting process with the Equity Advisory Group (EAG) and its customers through a public survey.² An area of concern for TEP is that as a general matter, this exercise seeks to prioritize certain statutory elements over others, which is not contemplated under Clean Energy Transformation Act (CETA).

6 **Stakeholder Engagement:** PacifiCorp engaged with its EAG on development of the CBIs and draft CEIP, and also sought feedback from its customers via a public survey. However, the customers responding to an Internet survey are most likely not fully representative of the Company’s customer base. Another area of concern is that other stakeholder advisory groups were not actively engaged as part of the development of the CEIP. The Energy Project appreciates that PacifiCorp did hold a recent meeting with the JA in mid-November, subsequent

¹ PacifiCorp Draft CEIP, pp. 29-30.

² PacifiCorp Draft CEIP, pp. 32-34.

to filing of the Draft CEIP. We hope that dialogue can continue, and that in the future, all stakeholder advisory groups are engaged more fully and actively on CETA implementation matters.

7 **Content of CBIs:** As mentioned above, TEP worked with JA to develop a draft list of CBIs shared with PacifiCorp in late July, 2021. The Company discusses the JA CBIs and indicates that in a few areas, modifications were made to the draft CBIs to incorporate feedback from the JA list. We appreciate that consideration and modification. The Energy Project has prepared a comparison analysis, and found that 46 percent of the JA CBIs were at least partially addressed through PacifiCorp’s list. An Attachment A provided with these informal comments provides that analysis.

8 The Energy Project strongly encourages PacifiCorp to look further at the JA CBIs, as our primary feedback is that we continue to recommend inclusion of all of the Joint Advocate CBIs. A few areas of omission are discussed below.

- *Arrearages 90+ days.* As part of the Covid-19 relief docket, the IOU data filings have underscored that those customers with arrearages 90 or more days past due are the customers most struggling to pay their bills and therefore most at risk of disconnection. While the draft CEIP includes residential disconnections as a CBI, TEP believes that Arrearages 90+ days, with a breakdown in the data as suggested by the JA CBI’s, is an important metric to also include in the CEIP. The JA list included Arrearages 90+ days as a CBI for the ‘Reduction in Cost’ statutory element.
- *Low-Income and Vulnerable Populations Access to Renewables and Distributed Energy Resource (DER).* This CBI metric from the JA list (as an ‘Energy Benefit’ CBI) is not at all addressed in PacifiCorp’s draft CEIP. Appendix A to the draft CEIP provides a mapping of the Company’s draft to the JA CBIs, and for this metric explains: “The Company has historically supported the creation of state funded renewable energy incentives targeted to low-income customers. As the state adopts renewable incentive

programs in the future, the Company will evaluate how to encourage their use in our service territory.”³ In general, this seems to be more of a passive approach. The Energy Project encourages PacifiCorp to work with stakeholders and seek to more actively encourage greater access to renewables and DERs for low income and vulnerable populations.

- *Improved Access to Reliable Clean Energy.* The JA CBI list included this CBI under the ‘Energy Security’ statutory element. Specific metrics within this proposed CBI included increased storage and backup power in neighborhoods for emergencies, increased DER in low-income neighborhoods, and optimizing grid investments through increased distribution system planning. Appendix A to the draft CEIP shows that the Company is not planning to track any of these metrics (for DER they mention again the Company’s historic support of state funded renewable efforts).⁴ We encourage PacifiCorp to consider inclusion of this CBI in the Final CEIP.

9 Additional issues included in the JA CBIs but omitted from PacifiCorp’s draft CBI list include the following:

- Improved health outcomes
- Reduced pollution burden and pollution exposure
- Electrification of transit
- Increased home comfort
- Reduced health care costs
- Review of utility credit code scoring and fewer customers with low utility credit codes.

10 **Data for Highly Impacted Communities and Vulnerable Populations:** The Energy

Project appreciates that PacifiCorp is seeking to analyze and present data related to its CBIs for Highly Impacted Communities (HIC) and Vulnerable Populations within its service territory.

Table 2.17, for example, shows Energy Burden data for different vulnerable population groups.

The Energy Project appreciates that PacifiCorp has begun to analyze and present this type of data

³ PacifiCorp Draft CEIP, Appendix A, p. 2.

⁴ Appendix A, p. 4.

in the development of its CBIs. In general, this kind of deeper analysis of utility data will help further refine the CBIs and should also help contribute to development of meaningful utility actions in the CEIP.

11 One example of inclusion of data for HIC in the draft CEIP pertains to duration and frequency of outages. Table 2.20 provides SAIDI, SAIFI, and CAIDI data including major events for all customers, for HIC, and for non-HIC areas.⁵ For all three metrics, the HIC data is significantly worse than for non-HIC areas. For example, the SAIDI result for HIC (435) is 92 percent higher than non-HIC (227), indicating that during major events, customers in HIC areas have much longer duration of outages.⁶ The CAIDI data shows that during major events, those customers in HIC areas would experience an outage of 210 minutes on average, 44 percent higher than the 146 minutes for non-HIC areas.⁷ As discussed below under “Specific Actions,” this is the type of data and information that can be particularly helpful in tracking performance under CETA, and especially relevant to developing utility actions that can help ensure equitable distribution of benefits.

12 In some areas of the draft CEIP, data by HIC or vulnerable populations is shown as “in progress” (e.g., Energy Burden, at Table 2.16; Residential disconnections, at Table 2.21). The Energy Project looks forward to reviewing that data once it is available. In addition, there are likely other areas where it would be very helpful to analyze this data for HIC and vulnerable

⁵ SAIDI is System Average Interruption Duration Index, SAIFI is System Average Interruption Frequency Index, and CAIDI is the Customer Average Interruption Duration Index. SAIDI and CAIDI are measured in minutes, and SAIFI measures the likelihood or probability of an outage. Draft CEIP, p. 44.

⁶ Draft CEIP, Table 2.20, p. 44.

⁷ *Id.* It would be helpful if the CEIP provided an explanation regarding PacifiCorp’s definition of “major events” as used in the SAIDI, SAIFI, and CAIDI calculations.

populations, such as Arrearages 90+ days, as well as utility credit code scoring (those customers most at risk of pending disconnection), in order to help develop specific actions that can have meaningful impact. As the Company further develops its CBIs for the Final CEIP, TEP encourages further consideration of the JA CBIs and breakdown of data for customers in HIC as well as vulnerable populations.

B. Specific Actions

13 PacifiCorp’s planned specific actions are described in Chapter 3, organized around four categories: supply side resources, community outreach & engagement, energy efficiency, and demand response. An overarching concern for TEP is a lack of understanding regarding how PacifiCorp’s planned specific actions will impact the CBIs. What is not yet fully clear, is how these planned utility actions relate specifically to the proposed CBIs. A central purpose of the CBIs is to allow the Commission and stakeholders to monitor and track performance related to CETA, and the specific actions should outline and describe the utility’s planned actions designed to impact those CBIs.

14 As an example of this, earlier we described the SAIDI, SAIFI and CAIDI data provided in the draft CEIP for HIC and non-HIC areas (again, we applaud the Company for inclusion of this type of data). This data is proposed as a CBI for Energy Resiliency (and risk reduction and energy benefit). Above we noted that when major events are included, the data is significantly worse for HIC, indicating that the duration and frequency of outages during major events are worse for customers in highly impacted communities. This would seem to represent a clear finding that could inform specific utility actions in the CEIP, to help improve performance in this

metric. However, there is no mention of any actions related to this in the Specific Actions chapter. The Energy Project appreciates that PacifiCorp considered inquiries on this issue during a recent meeting with JA.

15 Regarding the community outreach and engagement activities discussed in the Draft CEIP, TEP has some concerns and feedback. The Energy Project encourages the Company to actively engage with stakeholders, including the Low-Income Advisory Group, to help ensure that outreach efforts are working in partnership and utilizing trusted organizations and community partners. The Energy Project shared this feedback during a recent meeting the Company held with JA and we appreciate that the Company seems receptive to this feedback.

16 Another area of concern pertains to costs referenced in the draft CEIP as related to community engagement and outreach. PacifiCorp estimates total incremental costs of \$5.6M annually, which includes in part costs related to outreach and engagement. Given other legislative requirements that include outreach (e.g., SB 5295), as well as ongoing and historic utility outreach efforts, it may not be appropriate for PacifiCorp to assert that all of the costs for the outreach efforts mentioned in chapter 3 are fully attributable to CETA.

III. CONCLUSION

17 The Energy Project appreciates the opportunity to share this initial feedback with the Company and stakeholders as we continue to review PacifiCorp's draft CEIP. We look forward to continuing to work with PacifiCorp in the development of the final plan and we are hopeful that the Company will engage more actively with all its stakeholder advisory groups as this effort moves forward.