

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP, dba PACIFIC POWER &
LIGHT COMPANY

Motioner,

DOCKET UE-190908

**PacifiCorp’s Motion to Amend Order
01**

I. INTRODUCTION

I In accordance with Washington Administrative Code (WAC) 480-100-008, WAC 480-07-110, WAC 480-07-375 and WAC 480-07-870, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) moves the Washington Utilities and Transportation Commission (Commission) to issue an order amending Order 01 in docket UE-190908,¹ which requires the Company to provide to the Demand-Side Management (DSM) Advisory Group a draft ten-year conservation potential and two-year target by August 2, 2021 and draft program details, including budgets, by September 1, 2021. Specifically, PacifiCorp requests that the Commission amend Order 01 to allow the Company to provide to the DSM Advisory Group a draft ten-year conservation potential and two-year target by September 2, 2021 and draft program details, including budgets, by September 15, 2021. Appendix A to this motion sets forth the Company’s proposed revisions to Order 01, Attachment A. Granting the Company’s request is in the public interest because the draft ten-year conservation potential and two-year target and draft program details, including budgets, will be informed by PacifiCorp’s 2021 Integrated Resource Plan (IRP). As detailed below, PacifiCorp will file a final IRP no later than

¹ *In the Matter of Pacific Power & Light Company 2020-2029 Ten-Year achievable Conservation Potential and 2020-2021 Biennial Conservation Target Under RCW 19.285.040 and WAC 480 109 010*, Docket No. UE-190908, Order 01, Attachment A at 2 (Dec. 17, 2019).

September 1, 2021.² A delay in providing the DSM Advisory Group the Company's draft ten-year conservation potential and two-year target and draft program details, including budgets, is necessary given the documents' dependencies on the Company's final IRP.

2 PacifiCorp is an electric company and public service company in the State of Washington within the meaning of RCW 80.04.010, and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Washington. The Company provides electric service to approximately 130,000 retail customers in Washington and approximately 1.9 million total retail customers in Washington, California, Idaho, Oregon, Utah, and Wyoming.

3 PacifiCorp's name and address:

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II. PACIFICORP'S REQUEST TO AMEND GENERAL ORDER

4 In Order 01 in docket UE-190908, the Commission accepted PacifiCorp's 2020-2029 Ten-Year Achievable Electric Conservation Potential and 2020-2021 Biennial Conservation Target subject to conditions identified in Appendix A of the Order.³

Appendix A provides in part that,

Prior to filing the Biennial Conservation Plan, Pacific Power must provide the following information to the [DSM] Advisory Group: draft ten-year conservation potential and two-year target by August 2, 2021; draft program details, including budgets, by September 1, 2021; and draft

² *In the Matter of PacifiCorp's 2021 Integrated Resource Plan*, Docket No. UE-200420, Order 02, Ordering ¶ 1 (June 10, 2021).

³Docket No. UE-190908, Order 01, Ordering ¶ 1.

program tariffs by October 1, 2021.⁴

Thus, in accordance with Order 01, PacifiCorp must provide to the DSM Advisory Group a draft ten-year conservation potential and two-year target by August 2, 2021, and draft program details, including budgets, by September 1, 2021.

5 The Company is requesting that the Commission amend Order 01 to allow it to provide to the DSM Advisory Group a draft ten-year conservation potential and two-year target by September 2, 2021 and draft program details, including budgets, by September 15, 2021. An extension is needed given the issues the Company has encountered regarding its 2021 IRP. On April 1, 2021, in docket UE-200420, the Company filed an update to its January 4, 2021 draft 2021 IRP filing (April 1 Filing), with certain elements still in development.⁵ In that filing, the Company explained that due to modeling issues encountered with its new modeling system, Energy Exemplar's Plexos, the Company will submit its final 2021 IRP on or before September 1, 2021. The Commission accepted the Company's April 1 filing and directed PacifiCorp to file its complete final 2021 IRP on or before September 1, 2021.⁶

6 The Company's draft ten-year conservation potential and two-year target and draft program details, including budgets, are informed by the 2021 IRP. Specifically, the target setting process requires the identification of cost-effective, reliable, and feasible potential of possible technologies and conservation measures in the utility's service territory.⁷ Commission rules set forth the types of conservation that must be considered

⁴ Docket No. UE-190908, Order 01, Appendix A at 2.

⁵ See *In the Matter of PacifiCorp's 2021 Integrated Resource Plan*, Docket No. UE-200420, PacifiCorp 2021 Integrated Resource Plan (Apr. 1, 2021).

⁶ Docket No. UE-200420, Order 02, Ordering ¶ 1 (June 10, 2021).

⁷ WAC 480-109-100(1)(a)(i).

and evaluated as part of the target setting process and include end use efficiency.⁸ The 2021 IRP utilizes technical achievable potential inputs from the Conservation Potential Assessment (CPA) and selects resources by year for the 20-year planning horizon that are lower cost (cost-effective) when compared to other resources. Selections for end use efficiency undergo a review process to ensure they are fully aligned with latest regional assumptions from the Regional Technical Forum (RTF) and incorporate the latest code and standards assumptions. The review and adjustment process is performed by the third party, Applied Energy Group (AEG) used to perform the CPA and shared with the DSM Advisory Group. The biennial target must be no lower than a pro-rata share of the ten-year potential or the adjusted ten-year potential.⁹ The biennial target approved by the Commission includes additional adjustments for market transformation and an adder for decoupling. Once the target is established, the Company develops program forecasts, including program details and budgets along with cost effectiveness analysis that demonstrates how the Company will achieve the targets.

7 Granting the Company an additional month to provide a draft ten-year conservation potential and two-year target and additional six weeks to provide the draft program details, including budgets, will allow it to produce more accurate and meaningful program plans and details for stakeholders to evaluate and not waste Commission and stakeholder resources. The proposed changes were presented to the DSM Advisory group during the June 17, 2021 meeting and no objections were raised. There is good cause to grant the Company's request.

⁸ WAC 480-109-100(1)(b).

⁹ WAC 480-109-100(3)(b).

III. CONCLUSION

8 Based on the foregoing, the Company requests that the Commission amend Order 01 in docket UE-190908, which requires the Company to provide to the DSM Advisory Group a draft ten-year conservation potential and two-year target by August 2, 2021, and draft program details, including budgets, by September 1, 2021. Specifically, PacifiCorp requests the Order 01 be amended to allow it to provide to the DSM Advisory Group a draft ten-year conservation potential and two-year target by September 2, 2021, and draft program details, including budgets, by September 15, 2021. See Appendix A to this motion sets forth the Company's proposed revisions to Order 01, Attachment A. Granting the Company's request is in the public interest because the draft program plan and details will be informed by PacifiCorp's 2021 final 2021 IRP, which will be filed on or before September 1, 2021. Also, granting the Company's motion will allow for efficient use of Commission and stakeholder resources as they would be able to evaluate a more accurate and meaningful draft program plan and details.

DATED: this 2nd day of July, 2021.

Respectfully submitted,

/s/

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