

**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 the Clean Energy
Transformation Act

DOCKET UE-210414

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), petitions the Washington Utilities and Transportation Commission (Commission) for an order authorizing the Company to defer from the date of this petition forward costs associated with compliance with the Clean Energy Transformation Act (CETA). PacifiCorp seeks deferral of these costs to track and preserve them for later ratemaking treatment and the benefit of customers. This Amended Petition expands the scope of the requested accounting order from activities associated solely with the equity advisory group to activities associated with broader CETA compliance activities.

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:

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In addition, PacifiCorp respectfully requests that all data requests be addressed to:

By e-mail (preferred) 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 The Company's initial petition requested deferred accounting treatment for the costs associated with the equity advisory group required by WAC 480-100-655(b). WAC 480-100-655(b) requires PacifiCorp to "maintain and regularly engage an external equity advisory group to advise the utility on equity issues including, but not limited to, vulnerable population designation, equity customer benefit indicator development, data support and development, and recommended approaches for the utility's compliance with WAC 480-100-610 (4)(c)(i)." PacifiCorp must involve the equity advisory group in the

development of meaningful and inclusive public participation activities throughout the development and duration of the company’s Clean Energy Implementation Plan (CEIP), including outreach and education serving to vulnerable populations and highly impacted communities.¹ PacifiCorp is now amending its petition to specifically include additional non-capital costs incurred to comply with the broader requirements under CETA.

PacifiCorp will incur certain non-capital costs related to the equity advisory group requirement, the CEIP, and future CETA-driven regulatory actions including, but not limited to: consulting fees, educational and other material costs, compensation for equity advisory group participants, and, additional dedicated staffing. The costs for this effort have not been included in customer rates.

B. Proposed Accounting

5 During the deferral period, PacifiCorp proposes to account for the costs in the following manner. The costs will be deferred to FERC Account 182.3, Other Regulatory Assets. The Company requests that it be allowed to accrue interest on the unamortized balance at a rate equal to its authorized weighted average cost of capital most recently approved by the Commission in Docket UE-191024.

C. Estimate of Amounts

6 PacifiCorp estimates the costs to be approximately \$600,000 for 2021, with the potential for additional costs as CETA activities continue to develop. The costs will be situs assigned to PacifiCorp’s Washington customers. This estimate is based on contract costs with vendors and will increase as additional staffing is hired.

¹ WAC 480-100-655(1).

