

March 1, 2013

***VIA ELECTRONIC FILING  
 AND COURIER DELIVERY***

Public Utility Commission Oregon  
 550 Capitol Street NE, Suite 215  
 Salem, OR 97301-2551

Attn: Filing Center

**RE: Advice No. 13-006  
 Docket UE 263 – PacifiCorp’s Request for General Rate Revision**

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits for filing an original and 30 copies of the following proposed tariff pages associated with the Company’s Tariff P.U.C. OR No. 36, applicable to electric service in the State of Oregon, together with the Executive Summary and supporting direct testimony and exhibits. The tariffs reflect an effective date of March 31, 2013. Provided on the enclosed CDs (three) are electronic versions of the testimony, exhibits and workpapers, in their original format when available.

Second Revision of Sheet No.4	Schedule 4	Residential Service Delivery Service
Second Revision of Sheet No.5	Schedule 5	Separately Metered Electric Vehicle Service for Residential Consumers Delivery Service
Third Revision of Sheet No.15-1	Schedule 15	Outdoor Area Lighting Service – No New Service Delivery Service
Second Revision of Sheet No.23-1	Schedule 23	General Service – Small Nonresidential Delivery Service
Second Revision of Sheet No.28-1	Schedule 28	General Service Large Nonresidential 31KW to 200 KW Delivery Service
Second Revision of Sheet No.30-1	Schedule 30	General Service Large Nonresidential 201 KW to 999 KW Delivery Service
Second Revision of Sheet No.41-1	Schedule 41	Agricultural Pumping Service Delivery Service.
Second Revision of Sheet No.47-1	Schedule 47	Large General Service Partial Requirements 1,000 KW and Over Delivery Service
Second Revision of Sheet No.48-1	Schedule 48	Large General Service 1,000 KW and Over Delivery Service
Second Revision of Sheet No.50-1	Schedule 50	Mercury Vapor Street Lighting Service
Second Revision of Sheet No.51-1	Schedule 51	No New Service Delivery Service Street Lighting Service Company – Owned System Delivery Service
Third Revision of Sheet No.52-1	Schedule 52	Street Lighting Service Company –

		Owned System No New Service Delivery Service
Second Revision of Sheet No.53-1	Schedule 53	Street Lighting Service Consumer – Owned System Delivery Service
Third Revision of Sheet No.54-1	Schedule 54	Recreational Field Lighting – Restricted Delivery Service
Third Revision of Sheet No.55-1	Schedule 55	Led Pilot Street Lighting Service Company – Owned System Delivery Service
Second Revision of Sheet No.76R-1	Schedule 76R	Large General Service – Partial Requirements Service Economic Replacement Power Rider Delivery Service
Third Revision of Sheet No.200-1	Schedule 200	Base Supply Service
Second Revision of Sheet No.200-2	Schedule 200	Base Supply Service
Second Revision of Sheet No.200-3	Schedule 200	Base Supply Service
Third Revision of Sheet No.299	Schedule 299	Rate Mitigation Adjustment
Second Revision of Sheet No.723-1	Schedule 723	General Service – Small Nonresidential Direct Access Delivery Service
Second Revision of Sheet No.728-1	Schedule 728	General Service Large Nonresidential 31 KW to 200 KW Direct Access Delivery Service
Second Revision of Sheet No.730-1	Schedule 730	General Service Large Nonresidential 201 KW to 999 KW Direct Access Delivery Service
Second Revision of Sheet No.741-1	Schedule 741	Agricultural Pumping Service Direct Access Delivery Service
Second Revision of Sheet No.747-1	Schedule 747	Large General Service Partial Requirements 1,000 KW and Over Direct Access Delivery Service
Second Revision of Sheet No.748-1	Schedule 748	Large General Service 1,000 KW and Over Direct Access Delivery Service
Second Revision of Sheet No.751-1	Schedule 751	Street Lighting Service Company- Owned System Direct Access Delivery Service
Second Revision of Sheet No.752	Schedule 752	Street lighting Service Company- Owned System – No New Service Direct Access Delivery Service
Second Revision of Sheet No.753-1	Schedule 753	Street Lighting Service Consumer- Owned System Direct Access Delivery Service
Second Revision of Sheet No.754	Schedule 754	Recreational Field Lighting– Restricted Direct Access Delivery Service

Second Revision of Sheet No.776R-1    Schedule 776R    Large General Service-Partial  
Requirements Service-Economic  
Replacement Service Rider Direct  
Access Delivery Service

Copies of the Company's responses to the Standard Data Requests are provided under separate cover.

Please address all communications related to this filing to:

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Please direct informal correspondence and questions regarding this filing to Bryce Dalley, Director, Regulatory Affairs, at (503) 813-6389.

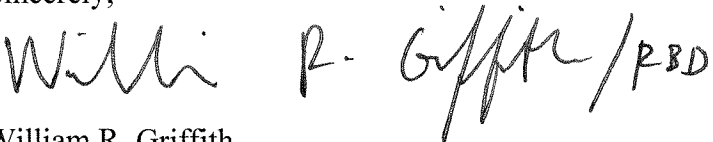
A copy of this filing has been served on all parties to PacifiCorp's last general rate case, docket UE 246, as indicated on the attached certificate of service. Confidential material in support of the filing has been provided to parties under the protective order issued February 27, 2013 (Order No. 13-061).

Oregon Public Utility Commission

March 1, 2013

Page 4

Sincerely,

A handwritten signature in black ink that reads "William R. Griffith / RBD". The signature is written in a cursive style with a large initial "W" and "R".

William R. Griffith

Vice President, Regulation

Enclosures

cc: UE 246 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UE 263**

In the Matter of  
PACIFICORP d/b/a PACIFIC POWER  
Request for a General Rate Revision.

**PACIFICORP'S  
EXECUTIVE SUMMARY**

**I. INTRODUCTION**

PacifiCorp d/b/a Pacific Power (the Company) is filing this request for a general rate revision under ORS 757.205 and ORS 757.220 to revise its schedules of rates and charges for electric service in Oregon, effective January 1, 2014. The revised rates reflect an Oregon-allocated revenue requirement increase of \$56.0 million, or 4.6 percent. If the tariff rider for the Mona-to-Oquirrh transmission project approved by the Commission in the Company's 2012 general rate case (2012 Rate Case), becomes effective while this proceeding is pending, the overall price increase in this case would be reduced by approximately \$11.4 million, to \$44.6 million or 3.7 percent.<sup>1</sup> The revised rates produce revenues necessary to sustain a stable, reliable, and low-cost power supply, while preserving the Company's ability to attract capital for future investments.

The Company has also included in this filing the analysis and evidence demonstrating that the Lake Side 2 natural gas fired generating plant (Lake Side 2) is a prudent investment that will be used and useful during calendar year 2014, which is the test period for this proceeding. Because Lake Side 2 is not projected to go into service until the second quarter

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<sup>1</sup> As discussed in the testimony of Ms. Joelle R. Steward, the increase to net rates is \$56.2 million, or 4.7 percent (\$44.8 million or 3.7 percent if the Mona-to-Oquirrh separate tariff rider becomes effective while this proceeding is pending), as a result of resetting the Rate Mitigation Adjustment to reflect forecast customer loads by rate schedule.

of 2014, the Company is proposing to delay implementation of the revenue requirement increase associated with the investment (\$22.7 million on an Oregon-allocated basis, or 1.8 percent) until it is serving customers. The Company files this executive summary and the attached Exhibit A in compliance with OAR 860-022-0019.

PacifiCorp is an electric company and public utility in Oregon within the meaning of ORS 757.005. The Public Utility Commission of Oregon (Commission) has jurisdiction over the prices and terms of PacifiCorp's electric service to its Oregon retail customers. The Company provides electric service to approximately 580,000 retail customers in Oregon and approximately 1.7 million total retail customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp's principal place of business is Portland, Oregon.

The Company requests that communications regarding this filing be addressed to:

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Please direct informal correspondence and questions regarding this filing to Bryce Dalley at (503) 813-6389.

## II. CASE SUMMARY

This case is based upon a historical base period of 12 months ended June 2012, with normalizing and pro forma adjustments to calculate a calendar year 2014 future test period. The new rates will become effective no later than January 1, 2014, assuming application of the full nine-month statutory suspension period to the 30-day effective date now contained in the tariffs. Thus, the rate effective period closely aligns with the test period in this case.

### A. Return on Equity

PacifiCorp is currently forecast to earn a return on equity (ROE) in Oregon of 7.9 percent on a normalized basis for the test period. Because the Company is filing this case less than three months after the order was issued in the 2012 Rate Case, the Company is not requesting to change its authorized return on rate base, ROE, or capital structure in this case.<sup>2</sup> The currently approved 9.8 percent ROE is necessary to maintain the financial integrity of the Company, while ensuring its ability to provide safe, efficient, and reliable service to its Oregon customers with minimal rate impacts.

The Company's approach in this case is consistent with the Commission's actions in the Company's 2010 general rate case, docket UE 217 (2010 Rate Case). On January 26, 2010, the Commission determined the Company's ROE, ROR, and capital structure in docket UE 210 (the Company's 2009 general rate case). On March 1, 2010, the Company filed its 2010 Rate Case, including a request to increase ROE. In a prehearing conference report issued by the Commission in the 2010 Rate Case on March 18, 2010, the Commission stated:

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<sup>2</sup> The parties to the partial stipulation in the 2012 Rate Case agreed to an overall rate of return (ROR) of 7.655 percent and a 9.8 percent ROE for Oregon regulatory purposes. The stipulation was approved by the Commission in Order No. 12-493 on December 20, 2012.

[B]ecause Pacific Power's last rate of return (which included an ROE component) was approved only a few months before the rate filing in this docket, the Commission will be looking for evidence of a material change in the markets, a change in circumstances, or some other good cause before it will be inclined to change the company's existing 10.125 percent ROE.

If other parties to this proceeding contest the Company's capital structure or cost of capital, the Company will respond with comprehensive analysis in its reply filing.

## **B. Cost Drivers**

### *1. Revised Depreciation Rates*

The Company's need for this rate increase is driven primarily by the impact associated with the revised depreciation rates proposed by the Company in docket UM 1647. The Company filed its application for authority to implement revised depreciation rates on January 31, 2013. As part of that filing, the Company requested authority to implement the revised depreciation rates in its accounting system on January 1, 2014, which coincides with the beginning of the rate effective period in this proceeding.

### *2. New System Investments*

The Company continues to make new investments in the system required to provide safe, adequate, and reliable service to customers and to comply with regulatory mandates. This case includes investments in all facets of the system—including transmission, generation, and distribution—to bolster reliability and improve power delivery. For example, this filing includes the addition of a fish collector system at the Company's Lewis River hydroelectric project that is required to comply with the license requirements of the Federal Energy Regulatory Commission. This filing also includes transmission infrastructure investments made to comply with mandatory system reliability and performance requirements, as well as investment in two-way radio equipment required to comply with



Federal Communications Commission narrowband rules.

In addition, this filing includes a turbine upgrade project at Unit 2 of the Jim Bridger generating plant. The upgraded turbine is expected to produce 12 megawatts of additional generation with no increase in fuel input or emissions at full load. Finally, this filing includes a proposal for a separate tariff rider for the Lake Side 2 generating plant, discussed in more detail below.

### 3. *Prepaid Pension Asset*

Consistent with the Company's position in the Commission's investigation into prepaid pensions in docket UM 1633, the Company is proposing to include PacifiCorp's net prepaid pension and accrued other post-retirement liability balances in rate base. The outcome of the Commission investigation may require modifications to the Company's proposal in this proceeding.

### **C. Lake Side 2 Generating Plant**

To mitigate the rate impacts on customers, the Company included plant in service through December 31, 2013, rather than through the end of the test period (December 31, 2014). The one exception is the Lake Side 2 generating plant. Lake Side 2 is currently expected to go into service in the second quarter of 2014, which is during the test period. Lake Side 2 is located on a 63.6 acre site in Vineyard, Utah, at the site of the Company's existing Lake Side generating facility. Lake Side 2 consists of a natural gas-fired combined-cycle plant with a capacity of 638 MW. The electrical energy generated by Lake Side 2 will be delivered to a new 345 kV point of interconnection substation (Steel Mill) where it will tie into the PacifiCorp transmission system. To begin recovery of the investment concurrent with the provision of service to customers, the Company is requesting approval to make an

advice filing for a separate tariff rider to recover the investment when it goes into service in the second quarter of the test period. The Oregon-allocated revenue requirement associated with this project is approximately \$22.7 million.

#### **D. Mitigating Factors**

In light of the current economic climate, PacifiCorp is keenly aware of the financial pressures faced by its customers. The Company has therefore taken several steps to mitigate the rate increase request.

First, the Company continues to aggressively and proactively control operations and maintenance (O&M) expense, the Company's filing includes a normalizing adjustment to reduce Oregon O&M expense by approximately \$4.0 million. Second, the Company has prudently controlled increases in labor costs, particularly benefit costs. Although health care costs have continued to rise at a steep rate, the Company has made adjustments to cost sharing and plan design to control costs and align market practices. Finally, as discussed above, the Company is not proposing changes to the capital structure or cost of capital approved by the Commission in the 2012 Rate Case.

### **III. TESTIMONY SUMMARY**

The Company's direct case consists of the testimony and exhibits of 12 witnesses:

**Richard Patrick "Pat" Reiten**, President, Pacific Power, provides the Company's policy testimony.

**Stefan A. Bird**, Senior Vice President, Commercial and Trading, discusses the Lake Side 2 natural gas-fired generating plant.

**Mark R. Tallman**, Vice President of Renewable Resources, discusses an addition at the Lewis River hydroelectric project required to comply with the license issued by FERC.

**Dana M. Ralston**, Vice President of Thermal Generation, provides information supporting the prudence of a turbine upgrade project at Jim Bridger Unit 2.

**Richard A. Vail**, Vice President of Transmission, describes mandatory transmission system reliability and performance requirements and provides information on capital investments in the Company's transmission system.

**Robert A. Ward**, Manager, Narrowband Compliance, describes the Company's narrowband compliance program.

**Kelcey A. Brown**, Regulatory Manager, Commercial and Trading, presents the load forecasting methodologies used in this case.

**Erich D. Wilson**, Director, Human Resources, presents an overview of compensation and incentive plans and supports the costs related to these areas included in the test period.

**Douglas K. Stuver**, Senior Vice President and Chief Financial Officer, addresses the Company's treatment of costs related to pensions and other post-retirement benefits.

**Gary W. Tawwater**, Manager, Revenue Requirement, presents the Company's overall revenue requirement using the 2010 Protocol inter-jurisdictional allocation methodology.

**C. Craig Paice**, Regulatory Specialist, Cost of Service and Pricing, presents the Company's cost of service study.

**Joelle R. Steward**, Director, Pricing, Cost of Service and Regulatory Operations, presents the Company's proposed allocation of the proposed price increase across rate schedules and the proposed changes in rate design for the affected rate schedules.

#### IV. CONCLUSION

The Company requests that the Commission issue an order approving the proposed rate changes and tariffs described above.

Respectfully submitted March 1, 2013.

A handwritten signature in black ink, appearing to read "Sarah K. Wallace", written over a horizontal line.

Sarah K. Wallace  
Senior Counsel

Etta Lockey  
Associate Counsel

PacifiCorp d/b/a Pacific Power

**Exhibit A**  
**Summary of Requested Electric General Rate Increase**  
Oregon Allocated  
Filed March 1, 2013

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(A)	Total revenues collected under proposed rates:	\$901,056,204																
(B)	Revenue change requested:																	
	Total:	\$55,986,989																
	Net of credits from federal agencies:	\$55,986,989																
(C)	Percentage change in revenues requested:																	
	Total %:	4.6%																
	Net of credits from federal agencies:	4.6%																
(D)	Test period:	Calendar year 2014																
(E)	Requested return on capital:	7.655%																
	Requested return on equity:	9.8%																
(F)	Rate base proposed in filing:	\$3,384,540,086																
(G)	Results of operation:																	
	Utility operating income, before proposed change:	\$225,375,688																
	Utility operating income, after proposed change:	\$259,098,491																
(H)	Effect of rate change on each customer class:	<table border="0" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;"><u>Base Change</u></th> <th style="text-align: left;"><u>Net Change<sup>1</sup></u></th> </tr> </thead> <tbody> <tr> <td>• Residential:</td> <td style="text-align: right;">3.9%      2.9%</td> </tr> <tr> <td>• Small General Service (Schedule 23):</td> <td style="text-align: right;">5.1%      4.1%</td> </tr> <tr> <td>• General Service 31-200 kW (Schedule 28):</td> <td style="text-align: right;">2.9%      1.7%</td> </tr> <tr> <td>• General Service 201-999 kW (Schedule 30):</td> <td style="text-align: right;">6.4%      5.2%</td> </tr> <tr> <td>• Large General Service &gt;= 1,000 kW (Schedule 48):</td> <td style="text-align: right;">7.4%      6.5%</td> </tr> <tr> <td>• Agriculture Pumping Service (Schedule 41):</td> <td style="text-align: right;">0.8%      3.7%</td> </tr> <tr> <td>• Street lighting:</td> <td style="text-align: right;">9.2%      6.5%</td> </tr> </tbody> </table>	<u>Base Change</u>	<u>Net Change<sup>1</sup></u>	• Residential:	3.9%      2.9%	• Small General Service (Schedule 23):	5.1%      4.1%	• General Service 31-200 kW (Schedule 28):	2.9%      1.7%	• General Service 201-999 kW (Schedule 30):	6.4%      5.2%	• Large General Service >= 1,000 kW (Schedule 48):	7.4%      6.5%	• Agriculture Pumping Service (Schedule 41):	0.8%      3.7%	• Street lighting:	9.2%      6.5%
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(I)	Information Required by Utility Staff General Rate Case Data Request Form A:	Provided under separate cover																

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<sup>1</sup> Net Change reflects the net impact to customers on January 1, 2014, of the proposed price change including resetting Schedule 299, the Rate Mitigation Adjustment. It also includes the net impact to customers following the effect of a separate tariff rider authorized in docket UE 246 which is expected to go into effect in 2013. Including these adjustments, a net increase of \$44.8 million, or 3.7 percent overall, is proposed to take effect on January 1, 2014.

## CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document, in Docket UE 246, on the date indicated below by email, addressed to said parties at his or her last-known address(es) indicated below.

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DATED: March 1, 2013

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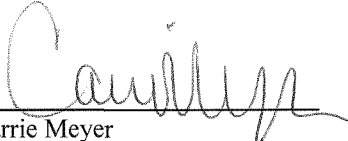
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