



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: PacifiCorp (U 901 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Pooja Kishore

Phone #: (503) 813-7314

E-mail: californiadockets@pacificorp.com

E-mail Disposition Notice to: californiadockets@pacificorp.com; r

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 641-E

Tier Designation: 2

Subject of AL: Greenhouse Gas (GHG) Environmental Performance Standard (EPS) Compliance Filing for 2020 (Tier 2)

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D. 07-01-039

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No.

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 3/18/21

No. of tariff sheets: NA

Estimated system annual revenue effect (%): NA

Estimated system average rate effect (%): NA

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: NA

Service affected and changes proposed¹: See advice letter.

Pending advice letters that revise the same tariff sheets: NA

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Pooja Kishore
Title: Regulatory Manager
Utility Name: PacifiCorp
Address: 825 NE Multnomah, Suite 2000
City: Portland State: Oregon
Telephone (xxx) xxx-xxxx: (503) 813-7314
Facsimile (xxx) xxx-xxxx:
Email: californiadockets@pacificorp.com

Name:
Title:
Utility Name:
Address:
City: State: Oregon
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

February 16, 2021

VIA ELECTRONIC FILING

California Public Utilities Commission
Energy Division
Tariff Unit, 4th Floor
505 Van Ness Avenue
San Francisco, CA 94102
Email: edtariffunit@cpuc.ca.gov

**RE: PacifiCorp U 901-E Supplemental Advice Letter 641-E-A
Greenhouse Gas (GHG) Environmental Performance Standard (EPS)
Compliance Filing for 2020 (Tier 2)**

Pursuant to Ordering Paragraph No. 4 of Decision (D.) 07-01-039, issued in R.06-04-009 on January 25, 2007, Pacific Power d/b/a PacifiCorp (PacifiCorp) submits this annual Attestation Letter affirming that the financial commitments PacifiCorp has entered into for generation during the prior calendar year are in compliance with the greenhouse gas (GHG) emissions performance standard (EPS). Specifically, PacifiCorp is in compliance with the EPS as it has no generation facilities and no long-term financial commitments for generation entered into in 2020.

Purpose

This Attestation Letter is provided in compliance with D.07-01-039 for LSEs (electrical corporation, electric service provider, or community choice aggregator) with new long-term financial commitments (defined on Page 3 in Attachment 7 of D.07-01-039). This Attestation Letter confirms that in 2020, PacifiCorp did not enter into any long-term contracts.

Background

D.07-01-039 requires all Load Serving Entities (“LSEs”) to file annual Attestation Letters, due February 15th of each year, attesting to the Commission that the financial commitments entered into for generation during the prior calendar year are in compliance with the EPS. D.07-01-039 requires LSEs to file Attestation Letters as an advice letter and serve the Attestation Letter on the service list in Rulemaking (“R.”) 06-04-009. This Attestation Letter is filed pursuant to that process.

D.07-01-039 requires LSEs to list long-term financial commitments of five years or longer that they have entered into during the prior year. Long-term financial commitments are compliant with the EPS if any of the following apply:

- 1) the long-term financial commitment is not in a baseload powerplant;

- 2) the long-term financial commitment is for generation using pre-approved renewable resource technology;
- 3) the long-term financial commitment relates to an existing combined-cycle combustion turbine (in operation/or permitted to operate as of 6/30/07) with an increase in rated capacity less than 50 megawatts (MW);
- 4) the net emission rate of each baseload facility underlying a covered procurement does not exceed 1,100 lbs of CO₂ per megawatt hour (MWh);
- 5) An exemption applies related to: reliability, extraordinary circumstances or financial harm, and CO₂ sequestration through injection in geological formations.

D.07-01-039 requires all LSEs to disclose the investment amount and type of alteration to retained generation, by generation facility and unit. D.07-01-039 also advises LSEs to present documentation regarding the design and intended use of the powerplant(s) underlying their new long-term financial commitments using the sources of information listed in California Public Utilities Code § 8341(b)(4), as well as any other sources of documentation that they believe will be relevant to this determination.

D.07-01-039 emphasizes that the key concept is to establish the design and intended use of the powerplant. Accordingly, documentation of the annualized plant capacity factor for the powerplant should include historical annual averages to help determine whether the plant is “designed and intended” to be used for baseload generation. D.07-01-039 requires LSEs to provide documentation of capacity factors, heat rates and corresponding emissions rates that reflect the actual, expected operations of the plant.

This Attestation Letter complies with the requirements outlined above.

Protests

This compliance filing is not subject to protest pursuant to General Order 96-B, Energy Industry Rule 9.

Any person desiring to protest this filing may do so by letter sent via U.S. Mail, by facsimile or electronically, any of which must be received no later than March 8, 2021. Protests should be sent to:

CPUC Energy Division
Attention: Tariff Unit, 4th Floor
505 Van Ness Avenue
San Francisco, California 94102
Facsimile: (415) 703-2200
E-mail: edtariffunit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest should also be sent via U.S. Mail (and by facsimile and electronically, if possible) to PacifiCorp at the address shown below on the same date it is mailed or delivered to the Commission:

Pooja Kishore
Regulatory Affairs Manager
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (503) 813-7314
E-mail: californiadockets@pacificorp.com

Matthew McVee
Chief Regulatory Counsel
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (503) 813-5585
E-mail: Matthew.McVee@pacificorp.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and be submitted expeditiously.

EFFECTIVE DATE

As directed by D.20-04-004, this advice letter is submitted as a Tier 2 filing. PacifiCorp respectfully requests that this Advice Letter become effective March 18, 2021, which is 30 days after filing.

NOTICE

In accordance with General Order (GO) 96-B, Section 4, a copy of this Advice Letter will be served electronically or via U.S. mail to parties shown on the GO 96-B service list, a copy of which is attached. A request for change of address in the GO 96-B service list should be directed by electronic mail to californiadockets@pacificorp.com. Advice letter filings may also be accessed electronically at: www.pacificpower.net/regulation.

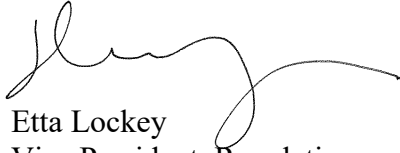
Please direct any informal questions to Pooja Kishore, Regulatory Affairs Manager, at (503) 813-7314.

California Public Utilities Commission

February 16, 2021

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Sincerely,

A handwritten signature in black ink, appearing to read 'Etta Lockey', with a long, sweeping horizontal line extending to the right.

Etta Lockey
Vice President, Regulation

Enclosure

CC

R. 06-04-009

CERTIFICATE OF SERVICE
GO-96B Distribution List

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have on this 16th of February, 2021, at Portland, OR, provided via email or US mail, a true and correct copy of PacifiCorp's Advice Letter 641-E to the following:

Robert M. Pocta
California Public Utilities Commission
Energy Cost of Service & Natural Gas
Room 4205
505 Van Ness Avenue
San Francisco, CA 94102
rmp@cpuc.ca.gov

Ralph Cavanagh
National Resources Defense Council
111 Sutter St. 20th Floor
San Francisco, CA 94104

Edward Randolph
Director Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Jeanne B. Armstrong
Goodin, MacBride, Squeri, Day & Lamprey
505 Sansome Street, Suite 900
San Francisco, CA 94111
jarmstrong@goodinmacbride.com

James Wuehler
California Public Utilities Commission
jrw@cpuc.ca.gov

Robert Finkelstein
TURN
bfinkelstein@turn.org

Michael B. Day
Goodin, MacBride, Squeri, Day & Lamprey
505 Sansome Street, Suite 900
San Francisco, CA 94111
mday@goodinmacbride.com

Dan Marsh
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Manager, Rates and Regulatory Affairs
701 National Ave
Tahoe Vista, CA 96148
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Surprise Valley Electrification
516 US Highway 395 E
Alturas, CA 96101-4228



Mary Penfield
Adviser, Regulatory Operations