



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; rct

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 658-E

Tier Designation: 2

Subject of AL: PacifiCorp (U 901 E) Advice Letter 658-E Requesting Revisions to the Blue Sky Program Tariffs Schedule RO-1, (Renewable Energy Rider – Optional) and Schedule RO-3, (Renewable Energy Rider – Optional Bulk Purchase Option)

Keywords (choose from CPUC listing): Tariffs

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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: 1/1/22

No. of tariff sheets: 2 (excluding index sheet)

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: RO-1, RO-3, Index

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:

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	

September 3, 2021

VIA ELECTRONIC FILINGEnergy Division Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov**Re: PacifiCorp (U 901 E) Advice Letter 658-E Requesting Revisions to the Blue Sky Program Tariffs Schedule RO-1, (Renewable Energy Rider – Optional) and Schedule RO-3, (Renewable Energy Rider – Optional Bulk Purchase Option)****PURPOSE**

In accordance with General Order (GO) 96-B, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company), hereby submits Advice Letter No. (AL) 658-E proposing modification to RO-1 and RO-3 to modify the definition of one block of renewable energy from 200 kilowatt-hours (kWh) to 100 kWh. The charge per block of \$1.95 will not change. The affected tariff sheets are attached as Exhibit A and include:

<u>Cal. P.U.C Sheet No.</u>	<u>Title of Sheet No.</u>	<u>Canceling Cal. P.U.C. Sheet No.</u>
4786-E	Index	4784-E
4787-E	Index	4785-E
4788-E	RO-1 Renewable Energy Rider – Optional	4423-E
4789-E	RO-3 Renewable Energy Rider – Optional Bulk Purchase Option	4424-E

BACKGROUND

PacifiCorp began offering the standard Blue Sky voluntary renewable energy program in California in 2004 through Tariff Schedule RO-1.¹ The standard Blue Sky Rider option was to provide customers the opportunity to purchase renewable energy as defined in the tariff at a premium of \$1.95 per 100 kWh block.

In 2005, a second option, the Bulk Purchase Option, was added to allow large-usage customers the option to purchase renewable energy at a less-expensive bulk rate through tariff Schedule RO-3.² The option requires a minimum annual purchase of 121.2 megawatt-hours. Both tariff options provide that the renewable purchases resulting from the program are in addition to the investments associated with the Company's generation portfolio which serves all customers and

¹ Tariff Schedule RO-1 was approved by the Commission through AL 317-E, effective February 24, 2004.

² Tariff Schedule RO-3 was approved by the Commission through AL 321-E and 321-E-A, effective June 30, 2005.

are not utilized for the purpose of satisfying California's Renewables Portfolio Standard requirements.

Since its inception, Blue Sky customers across all of PacifiCorp's service territory have purchased more than 10 billion kWh of renewable energy and supported the development of more than 300 community-based renewable projects. In addition to customer support, the Blue Sky program has been recognized by the National Renewable Energy Laboratory in its list of Top 10 Utility Green Power Pricing Programs list for 19 years.³ PacifiCorp currently has approximately 2,100 participating Blue Sky Block customers in California.

DISCUSSION

The price of Renewable Energy Credits (RECs) from 2012-2019 was stable. This helped inform the Company's decision to file Advice Letter No. (AL) 592-E on October 17, 2019, requesting approval to increase the size of each Blue Sky block from 100 kWh to 200 kWh of renewable energy while maintaining the current price of \$1.95 per block in an effort to meet growing customer demands in the renewable energy sector and to better align with market conditions for REC prices.⁴ The Commission approved the Company's filing in its Tariff Approval Letter issued December 17, 2019, effective January 1, 2020. The Company made similar filings in all six states where the Program was offered, with the proposed changes being contingent upon the Company receiving approval from all six states in order to maintain uniformity in Program management operations.

Since 2020, however, the price of RECs has increased to a point where it is unsustainable for the Program to maintain the size of each block at 200 kWh. Accordingly, the Company requests to reduce the size of each block back to 100 kWh to address the market fluctuation.

PROTEST

Anyone wishing 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 September 23, 2021. Protests should be mailed to:

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

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

³ <https://www.nrel.gov/analysis/green-power.html>

⁴ The proposed increase to standard block size did not alter individually negotiated contracts, including any contracts that were currently in place to facilitate direct purchase of RECs or any future individually negotiated agreements.

The protest should also be sent via U.S. mail and electronically, if possible, to PacifiCorp at the address show 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

Nathaniel Larsen
Associate Attorney
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (503) 813-7294
E-mail: nathaniel.larsen@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

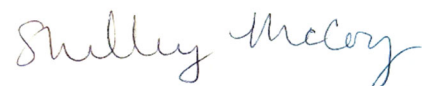
PacifiCorp submits this as a Tier 2 Advice Letter filing. PacifiCorp respectfully requests an effective date of January 1, 2022.

NOTICE

In accordance with General Order 96-B, General Rule No. 4.3, 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.

Any formal inquiries may be directed to Pooja Kishore, Regulatory Affairs Manager, at (503) 813-7314.

Sincerely,



Shelley McCoy
Director, Regulation

Attachments

Exhibit A
Proposed Tariffs

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(Continued)

Advice Letter No.	<u>658-E</u>	Issued by	<u>Etta Lockey</u>	Date Filed	<u>September 3, 2021</u>
Decision No.	<u> </u>	Name	<u>VP, Regulation</u>	Effective	<u> </u>
		Title	<u> </u>		
TF6 INDEX-1.REV				Resolution No.	<u> </u>

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(Continued)

Issued by

Advice Letter No. 658-E Etta Lockey Date Filed September 3, 2021
 Name
 Decision No. VP, Regulation Effective
 Title
 TF6 INDEX-2.REV Resolution No. _____

Schedule No. RO-3

RENEWABLE ENERGY
RIDER - OPTIONAL BULK PURCHASE OPTION

APPLICABILITY:

Applicable to all non-residential Customers taking service under the Company's rate Schedules.

TERRITORY:

Within the entire territory served in California by the Utility.

ADMINISTRATION:

Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases to Block purchases may be used to fund Qualifying Initiatives as defined below.

BLOCK:

1 Block equals 100 kWh of Renewable Energy. This program requires a minimum purchase of 1,212 blocks per year. For the purpose of qualifying for this Schedule, Customers with multiple sites can sum their Block purchases across all Pacific Power & Light Company and Rocky Mountain Power service territories to meet the minimum purchase requirement.

(C)

CHARGE PER BLOCK:

\$0.70 per month **Plus**
\$1,500.00 per year fixed charge

CHARGE:

The Charge can be billed either monthly, twice yearly or annually and shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block, plus the \$1,500 yearly fixed charge divided between the customer's billing choice (monthly, twice yearly or annually) and added to the Customer's standard bill. The Charge is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Charge shall be applied to the Customer's billing regardless of actual energy consumption.

RENEWABLE ENERGY:

Renewable Energy includes bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;
- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;
- pipeline or irrigation canal hydroelectric systems;
- wave or tidal action; and
- low emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservations such as creosote, pentachlorophenol or copper chrome arsenic.

(Continued)

Issued by

Advice Letter No. 658-E Etta Lockey Date Filed September 3, 2021

Name

Decision No. _____ VP, Regulation Effective _____

Title

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 3rd of September, 2021, at Portland, OR, provided via email or US mail, a true and correct copy of PacifiCorp's Advice Letter 658-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

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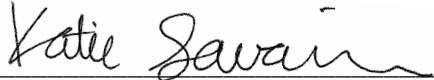
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