



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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 724-E

Tier Designation: 1

Subject of AL: Update the Net Billing Tariff in Compliance with Decision 20-01-007

Keywords (choose from CPUC listing): Net Billing

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.20-01-007

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: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: 1/1/24

No. of tariff sheets: 3

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: INDEX, NB-136

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: 721-E and 722-E for INDEX

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 St., 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: California
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	

November 1, 2023

VIA ELECTRONIC FILING

Advice Letter 724-E (U-901-E)

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) Advice Letter 724-E to Update the Net Billing Tariff in Compliance with Decision 20-01-007

PURPOSE

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits Advice Letter 724-E in compliance with Decision (D.) 20-01-007.

The tariff sheets associated with the Net Billing Program export credits are included as Attachment A and include:

CPUC Sheet No.	Title of Sheet No.	Canceling CPUC Sheet No.
5053-E	Tariff Index Sheet	5040-E
5054-E	Tariff Index Sheet	4998-E
5055-E	Schedule NB-136 – Net Billing Service	4805-E

BACKGROUND AND DISCUSSION

On April 19, 2019, PacifiCorp filed Application 19-04-013 (Application) for the approval of a Net Billing Program designed to compensate operators of renewable distributed generation for the avoided consumption of utility generation and the generators exports of surplus generation to PacifiCorp’s system. On January 23, 2020, the Commission issued D.20-01-007 approving the company’s Application and the Net Billing program opened to customers on April 1, 2020.

Ordering Paragraph 2 of Decision 20-01-007 states:

“The first advice letter from PacifiCorp d/b/a Pacific Power (PacifiCorp) setting the value of the net billing export credit shall be filed as a Tier 2 advice letter with the

Commission's Energy Division. Thereafter, PacifiCorp shall file an annual export credit update advice letter with a Tier 1 designation on November 1 of each year."

The Net Billing Program was originally proposed by PacifiCorp in Application (A.) 19-04-013 and approved by the Commission in Decision (D.) 20-01-007. Sections 5.2.2. and 5.2.3 of D.20-01-007 specifically approved the methodology and the update process, respectively. The initial filing implementing the approved program was made in a Tier 2 advice letter filed on January 28, 2020.¹ As approved in the application, the export credit calculation includes the following elements related to the impact of exported volumes on the company's system costs: avoided energy cost, avoided line losses, integration cost, avoided greenhouse gas compliance cost and avoided renewable portfolio standard cost. Additional details on each component of the export credit calculation are provided below. The methodology applied in this calculation remains unchanged from that approved in D.20-01-007. Additional references and source data supporting the calculations are provided in an accompanying workbook provided to Energy Division Staff.

- **Avoided Energy Cost:** lower cost (benefit) corresponding with the reduction in fuel expense and purchased power cost associated with customer generation exported to the grid. This cost reflects the published rates for standard qualifying facilities (QF) approved by the Oregon Public Utility Commission, which are also applied to qualifying facilities in PacifiCorp's California service territory. This filing reflects the most recent QF rates approved effective September 22, 2023.² A non-firm price adjustment of 93% is applied, consistent with the non-firm pricing option available in the standard Oregon QF schedule.³
- **Avoided Line Losses:** the adjustment (benefit) in line losses from the customer exporting at the secondary voltage level and avoiding transmission-level losses. This reflects marginal

¹ Advice Letter 600-E (U 901-E).

² The monthly prices used in the export credit calculation are found in Appendix 1 of Table 2 (pdf p. 24) in the Company's annual update filing made on April 28, 2023, available at: <https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAQ&FileName=um1729haq14727.pdf&DocketID=19527&numSequence=138>.

The Commission adopted (p. 1) Staff's recommendation to approve the Company's rate schedules that included new solar plus storage avoided cost rates (p. 2), effective September 22, 2023 in *In the Matter of PacifiCorp d/b/a Pacific Power, Request to Update Standard Avoided Cost Purchases from Eligible Qualifying Facilities, Avoided Cost Interim Solar-Plus-Storage Rate*, Docket No. UM 1729, Order No. 23-354 (Sep. 26, 2023), available at: <https://apps.puc.state.or.us/edockets/orders.asp?OrderNumber=23-354>. Order 23-354 created a new standard Solar Plus Storage rate, but left other rates unchanged.

The Commission adopted (p. 1) Staff's recommendation to approve the Company's April 28, 2023 annual update filing (p. 2), effective June 28, 2023, in *In the Matter of PacifiCorp, dba Pacific Power, Update to Standard Avoided Cost Schedule for Qualifying Facilities*, Docket No. UM 1729, Order No. 23-232 (Jun. 30, 2023), available at: <https://apps.puc.state.or.us/orders/2023ords/23-232.pdf>.

³ Pacific Power. Oregon Standard Avoided Cost Rates. Avoided Cost Purchases From Eligible Qualifying Facilities. Effective on and after September 22, 2023. Page 6, Pricing Option 5. Available at: https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/rates-regulation/oregon/tariffs/purpa/Standard_Avoided_Cost_Rates_Avoided_Cost_Purchases_From_Eligible_Qualifying_Facilities.pdf

primary line losses and incorporates the results of the loss study from PacifiCorp's most recent General Rate Case (2023 GRC).⁴ This filing reflects PacifiCorp's California 2018 Electric System Loss Study, which was used in the 2023 GRC.

- **Integration Cost:** the cost of PacifiCorp holding reserves with flexible resources to reliably maintain load and resource balance across its system. This reflects solar integration costs from the September 2021 Integrated Resource Plan (2021 IRP).⁵
- **Avoided Greenhouse Gas (GHG) Compliance Cost:** the reduction in PacifiCorp's system GHG emissions and associated compliance costs associated with non-emitting export credits. This is calculated using the most recent values from PacifiCorp's Energy Cost Adjustment Clause and Greenhouse Gas-Related Forecast and Reconciliation of Costs and Revenue filing (ECAC and GHG filing). The most recent filing was submitted on September 15, 2023, in docket A.23-09-008 and includes forecasted compliance costs for 2024. The actual emissions intensity value for 2022 is no longer submitted as part of the ECAC and GHG filing but continues to be calculated pursuant to the California Cap-And-Trade Mandatory Report Requirement (MRR) protocol that was used for values reported in the ECAC and GHG filings at the time the Net Billing program was approved in D.20-01-007 and in the first advice letter update.⁶
- **Avoided Renewable Portfolio Standard (RPS) Compliance Cost:** the reduction in PacifiCorp's RPS compliance costs from customers who choose to register their generator and transfer renewable energy credits for their exported generation to the company. Avoided RPS compliance costs reflect the forecast used in the Marginal Cost of Service Study conducted as part PacifiCorp's most recent 2023 GRC Application.⁷
- **On-Peak and Off-Peak Pricing:** The approved Net Billing program has differentiated pricing with the on-peak period defined as 4:00 p.m. to 10:00 p.m. Monday through Friday, with all other hours defined as off-peak. The weighing of on-peak and off-peak prices reflects the ratio of historical market prices in on-peak periods relative to off-peak periods.⁸

In accordance with Ordering Paragraph 2 of the Decision, the company submits Advice Letter 699-E to update the export credit values effective January 1, 2024.

⁴ *In the Matter of the Application of PacifiCorp (U901E), for an Order Authorizing a General Rate Increase Effective January 1, 2023*, A.22-05-006 (May 5, 2022).

⁵ PacifiCorp's 2021 Integrated Resource Plan (September 1, 2021). Volume II, Appendix F, Figure F.11. Available online at:

<https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2021-irp/Volume%20II%20-%209.15.2021%20Final.pdf>

⁶ The emissions intensity value used in the first advice letter filing (Advice Letter 600-E (U 901-E)) was identified in docket A.20-08-002, Exhibit PAC/209.

⁷ See A.22-05-006

⁸ Market prices reflect a blend of 15-minute EIM load aggregation point prices for PacifiCorp East, PacifiCorp West, and Malin from the most recent 36-month period, in this instance, the 36 months ending June 2023. The blending methodology is based on forecasted market transaction activity in these areas as specified by the Public Utility Commission of Oregon and is also incorporated in the determination of the approved avoided energy costs.

PacifiCorp’s proposed updates to the export credit are shown in the table below, with additional information regarding the calculation of on- and off-peak values included in Attachment B. The increase in the export credit is primarily due to higher market prices for electricity. A comparison is also shown relative to the Company’s pending Advice Letter update from Nov. 1, 2022.

<u>\$/MWh⁹</u>	<u>On-Peak</u>	<u>Off-Peak</u>	<u>Annual</u>
Current (CY2022)	\$50.44	\$38.09	\$40.29
Update (CY2024)	\$151.75	\$110.40	\$117.80
Delta	\$101.31	\$72.31	\$77.51

<u>\$/MWh¹⁰</u>	<u>On-Peak</u>	<u>Off-Peak</u>	<u>Annual</u>
Nov. 2022 Letter (CY2023)	\$90.53	\$72.27	\$75.52
Update (CY2024)	\$151.75	\$110.40	\$117.80
Delta	\$61.22	\$38.13	\$42.28

Installation of Energy Storage

Ordering Paragraph 10 of Decision 20-01-007 states:

“PacifiCorp d/b/a Pacific Power shall collect data on the installation of energy storage by net billing customers and provide this information to the Commission and stakeholders, along with a recommendation regarding whether a cap should be placed on energy storage installations, in its annual export credit update advice letter filed in November 1 of each year, beginning in 2021.”

As of August 31, 2023, there are 194 customers participating in the Net Billing program. Of those, 23 customers have installed an energy storage system in conjunction with their generating system. At this time, PacifiCorp does not recommend the creation of a cap on the amount of energy storage installations.

TIER DESIGNATION AND EFFECTIVE DATE

This Advice Letter is submitted as a Tier 1 filing per Ordering Paragraph 2 of Decision 20-01-007. PacifiCorp respectfully requests that this Advice Letter become effective January 1, 2024, which is more than thirty (30) days after this Advice Letter is filed.

⁹ Results do not include compensation for renewable energy credits (RECs). REC costs and benefits are addressed in the Company’s Energy Cost Adjustment Clause applications, as approved by the Commission in D.20-02-025.

¹⁰ Id.

PROTEST

Any person wanting to protest this filing may do so by letter sent by U.S. Mail, by facsimile, or electronically, any of which must be received no later than November 21, 2023. Protests should be mailed 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 by 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 Street, Suite 2000
Portland, OR 97232
Telephone: (503) 813-7314
E-mail: californiadockets@pacificorp.com

Joe Dallas
Senior Attorney
Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Telephone: (503-813-5701)
E-mail: joseph.dallas@pacificorp.com

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

Additionally, PacifiCorp respectfully requests that all data requests regarding this matter be addressed to (with a copy to the Company's Counsel):

By email (**preferred**): datarequest@pacificorp.com

California Public Utilities Commission

November 1, 2023

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By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

NOTICE

In accordance with General Order (GO) 96-B, Section 4, a copy of this Advice Letter will be served electronically or by U.S. mail to parties shown on the GO 96-B service list, a copy of which is attached. A request for a 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 the telephone number or e-mail address shown above.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

cc: Service List for GO 96-B
 Service List for A.19-04-013

Attachment A
Proposed Tariff Sheets

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Part E - Transition Cost Balancing Account (TCBA) 2235-2236-2237-2238-2239-
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Issued by

Advice Letter No. 724-E	Matthew McVee	Date Filed	November 1, 2023
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	Title		
TF6 INDEX-1.E		Resolution No.	

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Issued by

Advice Letter No. 724-E Matthew McVee Date Filed November 1, 2023
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Schedule No. NB-136
NET BILLING SERVICE
(Continued)

BILLING FOR IMPORTED ENERGY

A Customer-Generator will be billed for all Imported Energy at the applicable standard tariff rate.

CREDITS FOR EXPORTED ENERGY

A Customer-Generator will be credited for all Exported Energy at the credit rates set forth in this schedule. Exported Energy will be valued dependent upon the time of day in which the energy is exported. All kilowatt-hours exported during the On-Peak Period will be credited at On-Peak Energy Credit below. All kilowatt-hours exported during the Off-Peak Period will be credited at the Off-Peak Energy Credit below.

Exported Energy Credits:

On-Peak Energy Credit, per kWh	15.175¢	(I)
Off-Peak Energy Credit, per kWh	11.040¢	(I)

Credits for Exported Energy will be applied to the Customer's energy bill from the Utility to offset all charges, except Basic Charges, to the Customer for their Imported Energy.

Any Exported Energy Credits in excess of the charges eligible for offset on the Customer's monthly energy bill will be rolled forward to a subsequent billing period and may be used to offset any eligible charges in that billing period. Unused Exported Energy Credits will expire at the end of the March billing period for all Net Billing Customers except Customers taking service under an agricultural pumping rate schedule. Unused Exported Energy Credits for Net Billing Customers taking service under an agricultural pumping rate schedule will expire at the end of the October billing period.

OPTIONAL RENEWABLE ATTRIBUTES ADDER

Net Billing Customers will have the option to receive an additional Renewable Attributes Adder ("RAA") credit per kilowatt-hour of Exported Energy if they meet the following three conditions:

- 1) the Customer's generation facility must be registered in the Western Renewable Energy Generation Information System ("WREGIS")
- 2) the Customer's generation facility must obtain renewable portfolio standard ("RPS") certification from the California Energy Commission ("CEC") and provide proof of this certification to the Utility
- 3) the Customer-Generator must transfer the Renewable Energy Certificates ("REC"s) associated with its Exported Energy to the Utility.

In order to receive the Renewable Attributes Adder credit, the Customer must request and complete the Utility's Renewable Attributes Adder form. The customer must complete all requirements and are responsible for all costs related to certification and registration of the RECs with all required

(Continued)

Issued by

Advice Letter No. 724-E	Matthew McVee	Date Filed November 1, 2023
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	Title	

Resolution No. _____

**Attachment B
Export Credit Calculation
PacifiCorp**

State of California

Export Credit Summary by Element

Month	On-Peak					Off-Peak					Average*
	Energy \$/MWh	Losses \$/MWh	Integration \$/MWh	GHG \$/MWh	Total \$/MWh	Energy \$/MWh	Losses \$/MWh	Integration \$/MWh	GHG \$/MWh	Total \$/MWh	Total \$/MWh
1/1/2024	\$125.83	\$13.82	(\$2.19)	\$22.78	\$160.23	\$106.86	\$10.68	(\$1.86)	\$19.35	\$135.02	\$139.70
2/1/2024	\$116.76	\$11.94	(\$2.39)	\$24.85	\$151.16	\$88.86	\$8.46	(\$1.82)	\$18.91	\$114.41	\$121.06
3/1/2024	\$64.10	\$5.99	(\$2.12)	\$22.03	\$90.01	\$56.91	\$5.09	(\$1.88)	\$19.56	\$79.68	\$81.43
4/1/2024	\$60.37	\$5.36	(\$2.31)	\$24.07	\$87.49	\$47.81	\$4.05	(\$1.83)	\$19.06	\$69.09	\$72.46
5/1/2024	\$63.72	\$5.59	(\$2.90)	\$30.11	\$96.53	\$37.40	\$3.01	(\$1.70)	\$17.68	\$56.39	\$63.83
6/1/2024	\$68.78	\$6.32	(\$2.75)	\$28.62	\$100.97	\$43.88	\$3.79	(\$1.76)	\$18.26	\$64.17	\$70.31
7/1/2024	\$183.49	\$19.00	(\$2.60)	\$27.02	\$226.90	\$124.84	\$11.45	(\$1.77)	\$18.38	\$152.90	\$166.63
8/1/2024	\$239.56	\$24.28	(\$2.68)	\$27.92	\$289.08	\$156.75	\$14.06	(\$1.76)	\$18.27	\$187.33	\$205.38
9/1/2024	\$189.18	\$17.59	(\$2.79)	\$29.07	\$233.05	\$117.51	\$9.69	(\$1.74)	\$18.06	\$143.53	\$159.19
10/1/2024	\$69.32	\$5.95	(\$2.08)	\$21.67	\$94.85	\$62.69	\$5.06	(\$1.88)	\$19.60	\$85.47	\$87.21
11/1/2024	\$91.07	\$8.94	(\$2.26)	\$23.48	\$121.22	\$74.64	\$6.66	(\$1.85)	\$19.24	\$98.69	\$102.63
12/1/2024	\$130.17	\$14.22	(\$2.27)	\$23.56	\$165.68	\$106.15	\$10.72	(\$1.85)	\$19.21	\$134.23	\$139.81
Annual*	\$117.16	\$11.62	(\$2.44)	\$25.41	\$151.75	\$85.65	\$7.76	(\$1.81)	\$18.80	\$110.40	\$117.80
RPS					\$5.00					\$5.00	\$5.00
Annual w/RPS					\$156.75					\$115.40	\$122.80

Definitions:

On-Peak 4pm-10pm PPT Mon-Fri

Off-

Peak All other

* Average values reflect equal delivery in all hours

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 1st of November, 2023, at Portland, OR, provided via email, a true and correct copy of PacifiCorp's Advice Letter 724-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

Simon Baker
Interim Director Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

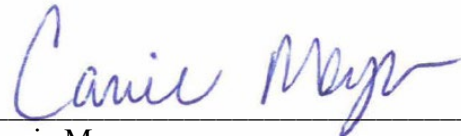
Surprise Valley Electrification
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Carrie Meyer
Adviser, Regulatory Operations

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

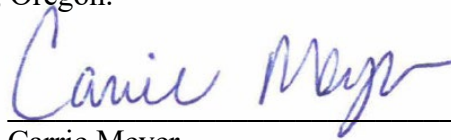
Application of PacifiCorp (U 901-E), an Oregon
company, for Approval of its Proposed Net Billing
Tariff to Compensate Eligible Customers.

Application No. 19-04-013
(Filed April 19, 2019)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served, the following document in A.19-04-013,
PACIFICORP ADVICE LETTER 724-E on all known parties to the attached service
list by transmitting an e-mail message with the document attached to each person named
in the official service list.

Executed on November 1, 2023, at Portland, Oregon.



Carrie Meyer
Adviser, Regulatory Operations



California
Public Utilities
Commission



CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: A1904013 - PACIFICORP - FOR APP
FILER: PACIFICORP
LIST NAME: LIST
LAST CHANGED: NOVEMBER 5, 2020

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