



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) #: 733-E

Tier Designation: 1

Subject of AL: Update California Alternate Rate for Energy 90 Percent Enrollment Goal

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.21-10-023

Does AL replace a withdrawn or rejected AL?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

Summarize differences between the AL and the prior withdrawn or rejected AL: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: 2/21/24

No. of tariff sheets: n/a

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: n/a

Service affected and changes proposed¹: n/a

Pending advice letters that revise the same tariff sheets: n/a

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: Wyoming
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	

February 21, 2024

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) Advice Letter No. 733-E – Tier 1
Update California Alternate Rate for Energy 90 Percent Enrollment Goal**

In accordance with the California Public Utilities Commission (Commission) Decision (D.) 21-10-023 issued October 22, 2021, PacifiCorp, d/b/a Pacific Power (PacifiCorp or the Company), submits Advice Letter No. 733-E to update the California Alternate Rates for Energy (CARE) 90 percent enrollment goal as of December 31, 2023, in compliance with Ordering Paragraph 8.

BACKGROUND

The CARE program is a low-income energy rate assistance program established in 1989 to provide a discount on energy rates to low-income households with incomes at or below 200 percent of Federal Poverty Guideline. In D.08-12-019, the Commission established a CARE enrollment goal of 90 percent of all eligible small and multi-jurisdictional utility (SMJU) customers. This goal was based on the results of the initial Low Income Needs Assessment (LINA) study completed in 2007 which estimated that 90 percent of the eligible customers were willing or likely to participate in the CARE program. As a result, the Commission has consistently required the SMJUs to meet the 90 percent enrollment goal.¹ D.21-10-023 approved a new budget cycle from 2021-2026. PacifiCorp proposed to reach a 90 percent enrollment rate in 2021, 91 percent by 2022, and 92 percent by 2026. PacifiCorp expects approximately 12,000 households to be enrolled in CARE annually, with 12,161 households enrolled by 2026. With respect to achieving CARE enrollment goals, Ordering Paragraph 8 of D.21-10-023 states:

“Alpine Natural Gas Operating Company No. 1, LLC, Golden State Water Company on behalf of Bear Valley Electric Service Division, Liberty Utilities LLC, PacifiCorp, Southwest Gas Corporation, and West Coast Gas Company must file a Tier 1 advice letter by no later than February 21, 2024, if it fails to meet the California Alternate Rates for Energy (CARE) 90 percent enrollment goal by December 31, 2023. The advice letter will include, but is not limited to, information on the cost of various outreach strategies implemented in the first

¹ D. 21-10-023 at 11.

*three years of the program cycle, the utility's most cost-effective strategies for increasing CARE enrollment, and any proposed outreach adjustments for the remaining program cycle based on the evaluation of previous outreach strategies."*²

DISCUSSION

PacifiCorp did not achieve the CARE enrollment target goal of 90 percent by December 31, 2023. Throughout the first half of the current budget cycle, PacifiCorp averaged CARE program enrollment penetration of about 86 percent annually. In the prior budget cycle, PacifiCorp achieved the 90 percent CARE enrollment goal, however, the penetration rate decreased due to removal of customers that failed to meet the program recertification or post enrollment verification requirements to remain on the program. At the end of 2023, PacifiCorp had 86.06 percent, or 11,398 CARE eligible households enrolled in the CARE program, about 4 percent short of the 90 percent target goal.

In this advice letter, PacifiCorp is providing information on the estimated eligibility, cost of various marketing and outreach strategies implemented in the first half of the program cycle, the strategies that were most effective, and proposed outreach adjustments for the remaining program cycle base on the evaluation of previous outreach strategies.

Estimated Eligibility

The SMJUs co-fund an annual Athens eligibility study to develop utility-specific base counts or technical eligibility customer count for the CARE program for the current program cycle spanning 2021 through 2026. The Athens study establishes estimates of low-income customers eligible for CARE programs in each utility's service territory. Findings from the study helped inform PacifiCorp of its CARE Eligible Households base counts or technical eligibility customer count. Additionally, PacifiCorp relies on the estimates from the study to determine and report its CARE enrollment penetration rate.

The Athens study conducted in 2022 established the 2023 CARE eligible household base count. In the study, PacifiCorp's CARE eligible count was adjusted to exclude residential services for seasonal occupancy and transitional vacancy. Based on the 2022 Athens study data, PacifiCorp had 31,878 permanent residential customers, of which approximately 41.54 percent or 13,244 were estimated to be eligible for the CARE program. Table 1 below provides a comparison of CARE enrollment penetration rate by county at year end for program years 2021 through 2023.

² D.21-10-023 at 160.

Table 1: CARE Enrollment Penetration Rate (2021 – 2023)

	December 2021	December 2022	December 2023
Del Norte	92%	84%	89%
Modoc	86%	82%	91%
Shasta	74%	87%	86%
Siskiyou	83%	86%	84%
Total Average	86%	85%	86%

Marketing and Outreach Strategies 2021 – 2023

The Company currently targets its entire service territory in California with Marketing and Outreach and continued to use a previously utilized mix of various media outreach methods including radio, print, digital and social media (Facebook) advertising along with direct enrollment mailing to all California residential customers not currently enrolled in the CARE program. PacifiCorp provides collateral and website content in English and Spanish. For direct mail, PacifiCorp planned to increase the frequency from once a year to twice a year for the current program cycle, an adjustment based on evaluation of this strategy in previous program cycle. PacifiCorp distributes CARE Program bill inserts in all residential bills twice a year and run bill messaging describing CARE program on an ongoing placement on all residential bills to increase awareness. In addition to the above strategies, PacifiCorp added new outreach strategies including cinema ads, cable billboards, and gas pump toppers including a QR code, senior directory ad placement, and an email to non-CARE residential customers. Table 2 below provides outreach strategies and related costs for the first half of the current program cycles.

Table 2: Outreach Strategies and Related Costs

Activity	2021	2022	2023
CARE Direct Mailing*	\$0	\$29,546	\$19,441
Bill Insert	\$5,711	\$2,251	\$5,553
Bill Messages	No incremental cost	No incremental cost	No incremental cost
Pacific Power Website	No incremental cost	No incremental cost	No incremental cost
IVR	No incremental cost	No Incremental cost	No Incremental cost
CARE Campaign Creative	\$1,740	\$11,332	\$4,379
Radio	\$8,083	\$13,762	\$21,403
Print (Newspaper)	\$5,117	\$4,175	\$2,165
Digital/Social	\$12,100	\$4,000	\$15,052
Cable/Cinema Advertising	-	\$7,000	\$6000
OTT media service	-	-	\$1000
Gas pump toppers	-	\$10,000	-
Energy Assistance Agencies	\$568	No incremental cost	\$125.00
New Customer Mailings	No incremental cost	No incremental cost	No incremental cost
Climate Credit Letter	No incremental cost	No incremental cost	No incremental cost
CARE brochures	\$400	-	-
Directory Ad Placement	-	\$1,070	\$150

*CARE Direct Mailing in 2021 was delayed until February 2022, and in 2023 only ran once.

Outreach

Direct mail outreach efforts have proved to be an effective outreach tool for low-income customers. Direct mail was used in the 2018-2020 budget cycle, and the direct mail campaign helps overcome the biggest challenges for CARE program enrollment, which is customer awareness. For the 2021-2026 budget cycle, PacifiCorp proposed to increase the frequency of direct mail outreach to twice per year to increase awareness and potential participation. Due to COVID-19 pandemic related supply chain issues, direct mail outreach planned for 2021 was delayed to February 2022. In 2022, PacifiCorp's direct mail campaign ran in February and October. In response to the February 2022 direct mail campaign, CARE participation percentage increased by approximately 3 percent, from 87.72 percent in January 2022 to 90.23 percent in March 2023; and in October, participation rate increased by approximately 3 percent, from 82.40 percent in September to 84.85 percent in December. In May 2022, the CARE participation rate decreased significantly to 82.47 percent due to removal of CARE enrolled customers that failed to meet the program recertification requirements to remain on the program. In 2023, PacifiCorp ran direct mail campaign once due to continued supply chain issues. Direct mail ran in July 2023, and participation rate increased by approximately 3 percent, from 82.87 percent in June to 85.39 percent in September.

Outreach - Proposed Strategies 2024-2026

PacifiCorp intends to continue to use the previously named methods of outreach for program awareness, with a focus on direct mail effort twice a year and adjust media buying based on market trends.

Conclusion

PacifiCorp continues to learn from its outreach efforts and program results. The Company is continually looking for new methods of outreach and engages with other SMJUs as well as monitors the large investor-owned utilities' programs for suggestions on how to enhance penetration rates. PacifiCorp is optimistic in its ability to reach the 90 percent CARE enrollment goal in the second half of the current cycle.

EFFECTIVE DATE

This advice letter is submitted as a Tier 1 filing and PacifiCorp respectfully requests that this advice letter become effective on February 21, 2024.

PROTESTS

Anyone wishing to protest this filing may do so only electronically. Protests must be received no later than March 12, 2024. Protests should be submitted to the CPUC Energy Division at:

E-mail: EdTariffUnit@cpuc.ca.gov

In addition, protests and all correspondence regarding this advice letter should also be sent electronically to the attention of:

Pooja Kishore
Regulatory Affairs Manager
E-Mail: californiadockets@pacificorp.com

Carla Scarsella
Deputy General Counsel
E-mail: carla.scarsella@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 shall be submitted expeditiously.

Additionally, PacifiCorp requests that all data requests regarding this filing be sent in Microsoft Word or plain text format addressed to:

By email (**preferred**)

datarequest@pacificorp.com

Or by regular mail to:

Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

NOTICE

In accordance with General Order 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 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 (503) 813-7314.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

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 21st of February, 2024, at Portland, OR, provided via email, a true and correct copy of PacifiCorp's Advice Letter 733-E to the following:

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rmp@cpuc.ca.gov

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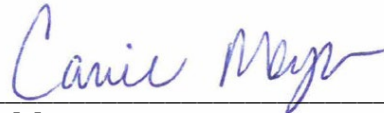
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