



ADVICE LETTER SUMMARY



ENERGY UTILITY

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

Company name/CPUC Utility No.:

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) #: 751-E

Tier Designation: 1

Subject of AL: Compliance Filing—Decision 24-11-007 Regarding PacifiCorp’s 2024 Energy Cost Adjustment Clause Rates

Keywords (choose from CPUC listing): ECAC, Energy Cost Adjustment Clause

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.24-11-007

Does AL replace a withdrawn or rejected AL?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Summarize differences between the AL and the prior withdrawn or rejected AL: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: Attachment B GHG Allowance Costs Chehalis Workpaper
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: 11/22/24

No. of tariff sheets: 3 incl Index

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

Estimated system average rate effect (%): 19.3%

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, ECAC-94

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: 724-E (NB-136), 724-E, 725-E, 746-E, 749-E, 750-E (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 Street, Suite 2000
City: Portland State: Oregon
Telephone (xxx) xxx-xxxx: (503) 813-7314
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Name:
Title:
Utility Name:
Address:
City: State: Oregon
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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 22, 2024

VIA ELECTRONIC FILING

Advice Letter 751-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 751-E
Compliance Filing—Decision 24-11-007 Regarding PacifiCorp’s 2024 Energy Cost
Adjustment Clause Rates – Effective November 22, 2024**

PURPOSE

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits Advice Letter 751-E, a compliance filing, to implement the rate change authorized by the California Public Utilities Commission (Commission) Decision (D.) 24-11-007 adopted on November 7, 2024, in Application (A.) 23-09-008. In this decision, the Commission approved an all-party settlement resolving issues in the Company’s proposed 2024 Energy Cost Adjustment Clause (ECAC) rates.

The affected tariff sheets are attached as Attachment 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>
5166-E	Tariff Index Sheet	5141-E
5167-E	Schedule ECAC-94	5042-E
5168-E	Schedule ECAC-94	5088-E

BACKGROUND

On September 15, 2023, PacifiCorp filed A.23-09-008 requesting approval to change rates on January 1, 2024, through its ECAC and Greenhouse Gas (GHG)-Related Forecast and Reconciliation of Costs and Revenues, a mechanism which was authorized in all of PacifiCorp’s general rate cases going back to 2005.¹

¹ PacifiCorp’s 2005 general rate case, A.05-11-022/D.06-12-011; PacifiCorp’s 2009 general rate case A.09-11-015/D.10-09-010; PacifiCorp’s 2019 general rate case A.18-04-002/D.20-02-025; and reaffirmed again as in PacifiCorp’s 2023 general rate case A.22-05-006/D.23-12-016.

On March 7, 2024, the Commission approved the GHG portion of the Application in D.24-03-011. The climate credit proposed in this application became effective March 12, 2024, and the GHG surcharge on April 1, 2024.

On November 7, 2024, the Commission voted to approve D.24-11-007, authorizing the Company’s request to update the 2024 ECAC rates in accordance with an all-party settlement resolving the remaining issues in PacifiCorp’s 2024 ECAC. The Company was ordered to file an advice letter to implement the rates and address costs related to the California and Washington Cap-and-Trade programs. Ordering Paragraph 2 of D.24-11-007 states:

“PacifiCorp d/b/a Pacific Power must file a Tier 1 Advice Letter to effectuate the Settlement Agreement in compliance with this decision, and if costs related to the California Cap-and-Trade emissions compliance program have been recovered or are scheduled to be recovered for the Chehalis Generation Facility, costs from Washington’s Cap-and-Invest Program must be excluded from PacifiCorp’s recovery pursuant to the Settlement and the Settlement’s costs must be recalculated by PacifiCorp in its Advice Letter.”

I. Rate Impact

The rate impact from the 2024 ECAC as approved in D.24-11-007 is a net increase of \$23,487,061 million or 19.3% from present rates and will result in the following changes by customer class:

Customer Class	Proposed Price Change	
	Dollars	Percent (%)
Residential	\$11,612,390	18.3%
Commercial/Industrial	\$8,813,137	21.0%
Irrigation	\$2,963,886	19.7%
Lighting	\$97,648	12.1%
Overall	\$23,487,061	19.3%

The table above reflects changes over present rates and does not reflect the California Climate Credit or GHG-related costs addressed in the Application.

II. California and Washington Climate Program Obligations and Costs²

A. Decision 24-11-007 Requires PacifiCorp to Investigate and Provide Its Findings on Questions Raised Regarding the Costs of California and Washington Emission Reduction Programs Included in the Approved Settlement Agreement

Decision 24-11-007, approving the rate settlement in PacifiCorp's 2024 ECAC Application, contained the following discussion of emission reduction costs in the rate settlement:

The Proposed Settlement provides for the 2024 PacifiCorp ECAC Application to only seek recovery in rates of California's allocated share of the Climate Commitment Act (CCA) costs from the Washington Cap-and-Invest program, and to not include any CCA costs allocated to other states where PacifiCorp provides service. This is principally reasonable and in the public interest. However, a further clarification of this settlement term is in order to remove any risk of confusion and to ensure that the Proposed Settlement's execution fully supports its intention.

PacifiCorp's 2024 Net Power Costs forecasted in the ECAC contain costs for compliance with Washington's Cap-and-Invest program related to emissions from the Chehalis Generation Facility, a natural gas-fired combined cycle electric generation facility located within Washington State. Article 2.6 of the Settlement Agreement clarifies that:

"The Parties agree that the 2024 PacifiCorp ECAC Application only seeks recovery in rates of California's allocated share of Climate Commitment Act ("CCA") costs from the Washington State Cap and Invest program, and does not include any CCA costs allocated to other states where PacifiCorp provides service..."

*There is a risk of confusion regarding the interaction of the California Cap-and-Trade program and the Washington State Cap-and-Invest program as it relates to the recovery of costs for emissions. **The Washington Department of Ecology has deferred compliance until 2027 to allow time to develop an agreement between Washington and California on treatment of electricity exported from Washington to California. Consequently, it would not be appropriate to include the Washington Cap-and-Invest costs within ECAC at this time.** Yet, this delay in the resolution of the issues surrounding the Washington Cap-and-Invest program and the California Cap-and-Trade system is not reflected in the Proposed Settlement language. In an abundance of caution, we direct clarification regarding one issue involved in the interaction of the Cap and-Trade program and the Cap-and-Invest program as it relates to the Proposed Settlement.*

² California's Cap-and-Trade program and Washington's Cap-and-Invest Program.

California Cap-and-Trade Program emissions costs, including imported emission costs, are levied by CARB and passed on to California customers under California's existing Cap-and-Trade system. It appears possible that emissions costs related to the Washington State Cap-and-Invest program for the Chehalis Generation Facility are found to be included as part of the costs to be recovered by PacifiCorp pursuant to capture of California's imported energy costs under Pub. Util. Code Section 95852(b); and, CARB Cap-and-Trade Regulation (Cap-and-Trade Regulation (Unofficial Electronic Version.

Therefore, PacifiCorp is directed to investigate, analyze, and if necessary clarify and correct the Proposed Settlement to ensure that the Chehalis Generation Facility's emission costs, if already scheduled to be levied by CARB pursuant to compliance with the California Cap-and-Trade program, are not again assessed by the Washington Cap-and-Invest program pursuant to the Proposed Settlement.

*The Proposed Settlement is clarified to confirm that, if necessary, PacifiCorp will revise its rates to exclude certain Chehalis Generating Facility emissions costs related to the Washington State Cap-and-Invest program if these emissions costs are already levied or already scheduled to be levied under the California Cap-and-Trade program. **PacifiCorp must file an Advice Letter regarding investigation and findings regarding this issue.** PacifiCorp must explain and propose revised rates in its Advice Letter if certain Chehalis Generating Facility emissions costs must be excluded pursuant to this decision in order for this Proposed Settlement to be effectuated.³*

In this Advice Letter, PacifiCorp provides the results of its investigation, which confirms that there are two distinct and separate obligations created by the California and Washington emission reduction obligations, and that there is no "double counting" or duplication of the costs for such obligations, and, therefore, no adjustment to the rates contained in the Settlement Agreement approved in D.24-11-007 is warranted.

B. Contrary to Assumptions Contained in D.24-11-007, PacifiCorp's 2023 Compliance Obligation in Washington Has Not Been Deferred

The Proposed Decision asserts that "The Washington Department of Ecology ("Ecology") has deferred compliance until 2027 to allow time to develop an agreement between Washington and California on treatment of electricity exported from Washington to California." However, this statement is not accurate. Ecology has issued its compliance report for the first year of its Climate Commitment Act ("CCA") Cap and Invest program, 2023, and the report confirms that owners of emitting facilities, including PacifiCorp, have been required to retire allowances and credits for 30% of their covered 2023 emissions. This report confirms PacifiCorp's compliance with the

³ D.24-11-007, pp. 16-17. (Emphasis added)

program.⁴ The Ecology compliance report establishes that PacifiCorp has incurred costs related to its CCA obligation arising from generation produced by the Chehalis plant within the State of Washington. The California-allocated share of those costs has been properly included in the Net Power Cost (“NPC”) used to calculate the Settlement Agreement ECAC rates approved by D.24-11-007.

C. There is No Duplication of Compliance Costs for the Chehalis Plant

The CCA Cap and Invest obligation for Chehalis plant generation within the State of Washington is a distinct and separate obligation that is not duplicative of the California cap and trade obligation arising out of power generated by the Chehalis plant and imported as a portion of PacifiCorp’s system power to California.

PacifiCorp is regulated subject to two independent, unlinked Cap and Trade regimes: First, California’s program, introduced in 2006, with 2013 as the first compliance year, and administered by the California Air Resources Board (“CARB”).⁵ Second, Washington’s CCA Cap and Invest program was introduced in 2021, with 2023 as the first compliance year, administered by Ecology.⁶

Cap and Trade programs distinguish utility service of retail load from two sources of power: imported power, and in-state generation. In the first case, when power is imported to serve load in a state with a Cap-and-Trade program, the entity holding the obligation is the “First Jurisdictional Deliverer” (“FJD”)—in other words, the entity that sent power into the state to serve the retail load.

PacifiCorp generates power throughout its multi-state system, and a portion of that power is allocated to California. Under California’s Cap and Trade program, the power that is cost-allocated to its California customers is treated as a Multi-Jurisdictional Retail Provider (“MJRP”) import according to the Mandatory Reporting Rule set out in Code of California Regulations (“CCR”) section 95111.⁷ As such, PacifiCorp is considered an FJD to California and incurs an obligation as an importer serving its load in the state.

In Washington, PacifiCorp’s system also serves Washington retail load as an FJD. When PacifiCorp delivers system power generated outside of Washington to Washington customers, it incurs an obligation as an MJRP importer, similar to California’s program. However, PacifiCorp also owns the Chehalis natural gas facility located in Washington, and incurs an additional Washington program obligation for Chehalis’s emissions as an in-state emitting facility.

Cap and Trade programs are market-based emissions reduction programs that require regulated entities to procure one allowance per metric ton of carbon dioxide equivalent of GHG emissions attributed to the entity in the state. Allowances are tradeable market instruments that

⁴ See Washington State Dept. of Ecology CCA Market Notice dated Nov. 15, 2024, which includes a link to the compliance report. Available at: https://ecology.wa.gov/air-climate/climate-commitment-act/cap-and-invest/auctions-and-market/compliance?utm_medium=email&utm_source=govdelivery

⁵ Assem. Bill No. 32 (2005–2006 Reg. Sess.).

⁶ Wash. Sen. Bill 5126 (2021–2022 Reg. Sess.).

⁷ Cal. Code Regs., tit. 17 § 95111.

may be procured at auction, bilaterally, or issued at no-cost. Issuing allowances at no-cost to electric utilities is intended to mitigate customer rate impact by covering some or all of the utility's retail obligation in a given compliance year. If an entity incurs an obligation not covered by a no-cost allowance, it must purchase an incremental allowance either at auction or on the secondary market.

California and Washington differ in their issuance practices and subsequent allowance requirements issued to PacifiCorp at no cost:

- In the California program, CARB issues allowances at fixed quantities to utilities on a pre-determined schedule⁸. Utilities are required to consign those free allowances to auction, then are required to purchase the given year's obligation. The consignment and purchase of these allowances are reflected as Direct GHG revenues and Direct GHG costs, respectively, in the ECAC.⁹
- In the Washington program, Ecology issues no-cost allowances based on 4-year utility forecasts and will adjust future allocations to adjust for actual incurred obligation.¹⁰ Unlike California's program, utilities do not have the requirement to consign their no-cost allowances to auction and re-buy them. In other words, utilities may retire these directly against their compliance obligation.
- However, Chehalis's Washington compliance obligation associated with its generation by the Chehalis plant and assigned to states outside of Washington, including California, *is not covered by no-cost allowances and requires incremental allowance purchases* to cover its obligation. PacifiCorp has included the California-allocated share of these costs as part of its NPC in 2024 ECAC rates approved by D.24-11-007.

D. The California and Washington Emission Reduction Programs Have Not Been Linked and Result in Two Distinct Obligations From the Generation of the Chehalis Plant

While both emission reduction programs operate similarly, the allowances used to comply with the California and Washington obligations are not fungible unless the programs are "linked."¹¹ In a Joint Statement by the California Air Resources Board ("CARB"), Ecology, and the Province of Quebec, these agencies indicated an intent to link their current joint carbon market with the Washington cap and invest carbon market.¹² However, the Joint Statement also made

⁸ California Cap and Trade Regulation Section § 95892. Allocation to Electrical Distribution Utilities for Protection of Electricity Ratepayers. Table 9-4: Annual Allowances Allocated to Each Electrical Distribution Utility from 2021 through 2030. Annual allowance allocation is adjusted with a reduction by CARB to account for EIM Purchaser Emissions.

⁹ Exhibits PAC/400–PAC/409.

¹⁰ Wash. Admin. Code § 173-446-230 (2022).

¹¹ Linkage refers to an agreement between emissions trading markets to accept each other's respective allowances or credits.

¹² See California Air Resources Board, Washington Department of Ecology, and the Province of Québec's Ministry of the Environment, the Fight Against Climate Change, Wildlife and Parks joint statement on a shared carbon market, September 23, 2024, available at <https://ecology.wa.gov/about->

clear that, “Washington must complete several other steps required by law before finalizing and signing a linkage agreement: an Environmental Justice Assessment, a final evaluation of the linkage criteria in the Climate Commitment Act, and seeking public input.”¹³ Those steps have not been completed to date. PacifiCorp will inform the Commission when and if such discussions result in a change to either program.

Thus, PacifiCorp’s obligations under the California cap and trade program related to power imported into California from the Chehalis plant and its obligations under the Washington cap and invest program for generation from the Chehalis plant within the State of Washington remain two different obligations. CARB has acknowledged that the same MWh of generation may incur a separate obligation under two unlinked state emission reduction programs when emitting power located in one state is “exported” into the other.¹⁴ This is the case with generation from PacifiCorp’s Chehalis facility. In California’s program, Chehalis is one of the resources allocated to serve retail California load as part of the PacifiCorp system, appearing as part of the MJRP import obligation. Thus, the inclusion of Chehalis-related costs for PacifiCorp’s obligation under the California Cap and Trade program is distinct and separate from PacifiCorp’s obligation in Washington resulting from Chehalis facility’s generation within the State of Washington, and PacifiCorp allocates a portion of the cost of this obligation to each of the other states it serves.

E. PacifiCorp’s Investigation Has Confirmed That Two Separate Emission Reduction Obligations Apply to the Chehalis Plant and Have Been Properly Accounted for in the ECAC Rates Approved in D.24-11-007

In summary, PacifiCorp has confirmed that the Washington CCA Cap and Invest program has not been deferred and PacifiCorp has reasonably incurred costs to comply with its obligations for the initial 2023 compliance year. Nor have the Washington and California programs been linked in any way. In addition, PacifiCorp has established that the California Cap and Trade obligation for imports into California is a separate and distinct obligation from the CCA Cap and Invest obligation for generation within the State of Washington, which applies to system power generated by the Chehalis plant and exported to California and other states in the PacifiCorp system. Accordingly, the California-allocated compliance costs for both programs are properly included in the NPC used to calculate the 2024 ECAC rates approved by D.24-11-007.¹⁵

[us/who-we-are/news/2024-news-stories/california-quebec-and-washington-to-begin-linkage-agreement-discussions](https://www2.arb.ca.gov/news/2024-news-stories/california-quebec-and-washington-to-begin-linkage-agreement-discussions).

¹³ *Ibid.*

¹⁴ See California Air Resources Board, Cap-and-Trade Program Workshop, October 5, 2023, available at https://ww2.arb.ca.gov/sites/default/files/2023-10/nc-CapTradeWorkshop_Oct052023_afternoon_0.pdf (noting that electricity generators covered in another jurisdiction’s carbon pricing program that import electricity to California may face dual carbon costs, and regulatory amendments may be needed to recognize a carbon price applied by another jurisdiction on electricity imported into California). Emphasis added.

¹⁵ The costs for the California and Washington emission reduction programs are included in the exhibits admitted into evidence in A.23-09-008 to support the NPC calculation of the 2024 ECAC rates in the Settlement Agreement. These costs are included within the following exhibits:

- California Program: California’s forecasted and actual obligation is captured under “Direct GHG Emissions” Line 7, “MJRP Compliance Obligation” in Exhibit PAC/402. This represents the totality of PacifiCorp’s obligation attributed to California. The forecast and

PacifiCorp prepared a confidential workpaper which separately states the Washington Cap and Invest costs associated with the import of energy from Chehalis to California. This workpaper is attached to this Advice Letter, accompanied by a Declaration Supporting Confidential Treatment of the Attachment.¹⁶ A redacted public version of this workpaper is also provided with this Advice Letter.

PacifiCorp has performed and reported the results of the investigation required by D.24-11-007, and by establishing that there is no duplication of emission reduction compliance costs related to the Chehalis plant, has demonstrated that there is no need to modify the settlement agreement adopted in the 2024 ECAC to adjust or remove any of the emission reduction costs for either the California or Washington emission reduction programs.

TIER DESIGNATION AND EFFECTIVE DATE

This advice letter is submitted as a Tier 1 filing in accordance with Ordering Paragraph 2 of D.24-11-007. PacifiCorp respectfully requests that this Advice Letter requesting rates become effective on the date of filing, November 22, 2024.

PROTEST

Anyone wishing to protest this filing may do so only electronically. Protests must be received no later than, December 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

-
- direct GHG costs incurred by the purchase of allowances are at Line 3, “Compliance Costs” in Exhibit PAC/404 and “CA GHG Retail Obligation (\$)” in Exhibit PAC/405, respectively.
- Washington Program: California’s allocated share of Chehalis’s Washington compliance cost is not separately stated in PacifiCorp’s ECAC NPC Exhibits. However, the WA emission reduction program costs are imbedded along with other NPC expense items in the following exhibits in this proceeding:
 - In Exhibit PAC/101, the Calendar Year (“CY”) 2024 costs are embedded in Chehalis’ gas fuel burn expense line item.
 - In Exhibit PAC/203, the CY 2023 costs for Jan – May are embedded in the Total Short Term Firm Purchases line item.
 - In Exhibit PAC/203, the CY 2023 costs for Jun – Dec are embedded in Chehalis’ gas fuel burn expense line item.

¹⁶ See Attachment B: Workpaper entitled “GHG Allowance Costs_Chehalis_CONF.xlsx”; Attachment C: Declaration of Michael Wilding in Support of Confidential Treatment for Attachment B of Advice Letter No. 751-E; and Attachment D: PacifiCorp Matrix of Confidential Redactions.

E-mail: californiadockets@pacificorp.com

Zachary Rogala

Senior Attorney

E-mail: zachary.rogala@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.

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 and on the service list for A.23-09-008, copies of which are 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.

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
zachary.rogala@pacificorp.com
pooja.kishore@pacificorp.com

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

Company Counsel: Zachary Rogala
Senior Attorney
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (435) 319-5010
E-mail: zachary.rogala@pacificorp.com

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

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosure

Attachment A
Proposed Tariff Sheets

SCHEDULE ECAC-94

ENERGY COST ADJUSTMENT CLAUSE TARIFF RATE RIDER
(Continued)

DEFINITIONS: (Continued)

Adjusted Actual NPC is the sum of the total Company amounts recorded in Account Numbers: 501, 503, 509 and 547 (Steam Production-Fuel Expense) for (N) coal, steam and natural gas purchased and or sold; 555 (Purchased Power), 565 (Wheeling); and 447 (Sales for Resale). Adjustments will be made to these accounts so adjusted actual costs are consistent with costs modeled in the Company's production cost model, to remove prior period accounting entries made during the accrual period, and to include Commission-adopted adjustments from the most recent general rate case.

Adjusted Actual/Projected NPC is the combination of Adjusted Actual NPC for the portion of the Balancing Period for which Adjusted Actual NPC has been recorded and the Projected NPC for the remainder of the Balancing Period (this remainder is the Intermediate Period).

ECAC Balancing Rate is the Balancing Period's California allocated share of the difference between prior ECACs' Projected NPC and Adjusted Actual/Projected NPC plus Other Costs for Recovery all adjusted by California actual sales, divided by California projected sales and adjusted for the ECAC Billing Factor.

BASIS OF RATES

Projected NPC, Other Costs for Recovery and Adjusted Actual NPC will be collected from customers through the Projected ECAC and Deferred ECAC Rates as presented below under Monthly Billing. Projected ECAC rates are demand and energy rates by rate schedule developed based on the ECAC Offset Rate and functionalized demand and energy cost allocation. Deferred ECAC rates are demand and energy rates by rate schedule developed based on the ECAC Balancing Rate and functionalized demand and energy cost allocation.

TIMING

The Company shall file normally scheduled Total ECAC Adjustment applications with the Commission on or before August 1st of each year. The implementation and effective date of Total ECAC Adjustments shall be January 1st of each year, unless otherwise ordered by the Commission.

MONTHLY BILLING

All charges and provisions of the applicable rate schedule will be applied in determining a Customer's bill except that the Customer's total electric bill will be adjusted by an amount equal to the product of all kilowatt demand multiplied by the following dollar per kilowatt rate plus all kilowatt-hours of use multiplied by the following cents per kilowatt-hour rate:

(Continued)

Issued by

Advice Letter No. 751-E Matthew McVee Date Filed November 22, 2024

Name

Decision No. VP, Regulation Effective

Title

SCHEDULE ECAC-94

ENERGY COST ADJUSTMENT CLAUSE TARIFF RATE RIDER
 (Continued)

MONTHLY BILLING (Continued)

Schedule	Billing Units	Projected ECAC	Deferred ECAC	Total ECAC Adjustment	
A-25	Energy per kWh	4.494¢	1.648¢	6.142¢	(I)
A-32	Demand per kW	\$2.13	\$0.78	\$2.91	(I)
	Energy per kWh	3.398¢	1.246¢	4.644¢	(I)
A-36	Demand per kW	\$4.47	\$1.64	\$6.11	(I)
	Energy per kWh	3.399¢	1.246¢	4.645¢	(I)
AT-29	Energy per kWh	3.398¢	1.246¢	4.644¢	(I)
	Plus per On-Peak kWh	+8.000¢		+8.000¢	
	Less per Off-Peak kWh	-1.581¢		-1.581¢	
AT-48	Demand per kW	\$4.27	\$1.56	\$5.83	(I)
	Energy per kWh	3.409¢	1.250¢	4.659¢	(I)
	Plus per On-Peak kWh	+0.858¢		+0.858¢	
	Less per Off-Peak kWh	-0.171¢		-0.171¢	
D	Energy per kWh	4.498¢	1.649¢	6.147¢	(I)
DT	Energy per kWh	4.498¢	1.649¢	6.147¢	(I)
	Plus per On-Peak kWh	+6.900¢		+6.900¢	
	Less per Off-Peak kWh	-1.747¢		-1.747¢	
DL-6	Energy per kWh	4.498¢	1.649¢	6.147¢	(I)
DS-8	Energy per kWh	4.498¢	1.649¢	6.147¢	(I)
DM-9	Energy per kWh	4.498¢	1.649¢	6.147¢	(I)
PA-20	Demand per kW	\$2.46	\$0.90	\$3.36	(I)
	Energy per kWh	3.398¢	1.246¢	4.644¢	(I)
	Optional Time-of-Use Rate Adders:				
	Plus per On-Peak kWh	+4.570¢		+4.570¢	
	Less per Off-Peak kWh	-0.923¢		-0.923¢	
LS-51	Energy per kWh	4.494¢	1.648¢	6.142¢	(I)
LS-53	Energy per kWh	4.494¢	1.648¢	6.142¢	(I)
OL-15	Energy per kWh	4.494¢	1.648¢	6.142¢	(I)
OL-42	Energy per kWh	4.494¢	1.648¢	6.142¢	(I)

(continued)

Issued by

Advice Letter No. 751-E Matthew McVee Date Filed November 22, 2024

Decision No. _____ VP, Regulation Effective _____

TF6 ECAC-94-3.E _____ Title _____ Resolution No. _____

REDACTED

Attachment B

2024 Energy Cost Adjustment Clause A.23-09-008	
Washington Cap and Trade Allowance Costs	
Chehalis Generation Facility	
Annual Costs	

Plant	Date	Total- Company Cap and Trade Costs	California-Allocated Cap and Trade Costs
Chehalis	2023	\$38,891,519	\$552,293
Chehalis	2024	\$61,538,115	\$869,700

2024 Energy Cost Adjustment Clause A.23-09-008	
Washington Cap and Trade Allowance Costs	
Chehalis Generation Facility	
Monthly Costs	

Plant	Date	Total- Company Cap and Trade Costs	Allocation Factor	California-Allocated Cap and Trade Costs
Chehalis	1/1/2023			
Chehalis	2/1/2023			
Chehalis	3/1/2023			
Chehalis	4/1/2023			
Chehalis	5/1/2023			
Chehalis	6/1/2023			
Chehalis	7/1/2023			
Chehalis	8/1/2023			
Chehalis	9/1/2023			
Chehalis	10/1/2023			
Chehalis	11/1/2023			
Chehalis	12/1/2023			
Chehalis	1/1/2024			
Chehalis	2/1/2024			
Chehalis	3/1/2024			
Chehalis	4/1/2024			
Chehalis	5/1/2024			
Chehalis	6/1/2024			
Chehalis	7/1/2024			
Chehalis	8/1/2024			
Chehalis	9/1/2024			
Chehalis	10/1/2024			
Chehalis	11/1/2024			
Chehalis	12/1/2024			

ATTACHMENT C

**DECLARATION OF MICHAEL WILDING IN SUPPORT OF CONFIDENTIAL
TREATMENT FOR ATTACHMENT B TO ADVICE LETTER NO. 751-E**

**DECLARATION OF MICHAEL WILDING IN SUPPORT OF CONFIDENTIAL
TREATMENT FOR ATTACHMENT B TO ADVICE LETTER NO. 751-E**

I, Michael Wilding, state:

1. I am the Vice President of Energy Supply Management for PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company).
2. On November 20, 2024, PacifiCorp submitted its Advice Letter No. 751-E to implement the rates for its 2024 Energy Cost Adjustment Clause and Greenhouse Gas-Related Forecast and Reconciliation of Costs and Revenue proceeding (A.23-09-008) (“ECAC”).
3. I have reviewed the Company’s Advice Letter No. 751-E, and its Attachments.
4. In support of its Advice Letter, PacifiCorp submitted Attachment B, which consists of a confidential workpaper exhibit prepared by Ramon J. Mitchell of PacifiCorp, identifying the cap and trade allowance costs for PacifiCorp’s Chehalis generation facility under the Washington State Climate Commitment Act (“CCA”) Cap and Invest emission reduction program.
5. Attachment B contains a spreadsheet, titled “GHG Allowance Costs_Chehalis_Workpaper_CONF. xlsx.” In the tab of the spreadsheet entitled “Monthly WA CCA Costs,” rows 7 to 30 contain confidential information in the form of actual and forecasted accruals of CCA allowance costs incurred or to be incurred by PacifiCorp. The State of Washington has mandated that registered entities are prohibited from releasing or disclosing bidding strategy in the Washington CCA program. Public disclosure of the accruals of actual and forecasted CCA allowance costs would permit competitors to obtain information about the timing and magnitude of PacifiCorp’s

bidding for allowances in auctions. This information was identified as confidential at the time it was submitted.

6. This declaration is based on my information and belief and is submitted in accordance with General Order (GO) 66-D of the California Public Utilities Commission (Commission).
7. Information submitted to the Commission is public, unless otherwise protected as confidential. Various California statutes and Commission decisions detail how stakeholders can request the Commission to protect certain information as confidential. To merit protection in informal proceedings, stakeholders must: identify what information should be protected, describe the basis for protection, provide an appropriate declaration that supports the request, and include appropriate contact information. The Commission protects information as confidential when permitted by relevant California and federal law, and has adopted categories of information that the Commission generally protects as confidential.
8. Attachment B of Advice Letter 751-E contains market-sensitive and confidential information that would reveal to competitors important information about how PacifiCorp has historically bid for allowances and plans participate in the Washington CCA program. Public disclosure of this information would compromise PacifiCorp's ongoing participation in the CCA emission reduction program, particularly regarding bidding for and purchasing required allowances, which is prohibited under the Washington CCA program regulations¹ and would ultimately harm customers by unnecessarily inflating the prices paid for such allowances by PacifiCorp.

¹ Washington Administrative Code 173-446-317.

9. Accordingly, PacifiCorp is asserting a claim of confidentiality for the information in Attachment B, located on rows 7-30 of the tab of the spreadsheet entitled “Monthly WA CCA Costs.”
10. Consistent with California law, and Commission policy and precedent, PacifiCorp asserts that the information identified above is confidential and respectfully requests the Commission protect that information as confidential. PacifiCorp makes every effort to prevent public disclosure of this information, and this information has not been disclosed to date. The confidential information in Attachment B falls within the scope of the information protected in the IOU Matrix, proprietary and trade secret information, or other intellectual property and protected market sensitive/competitive data subject to confidential treatment under GO 66-D or other applicable state statute. The Commission has historically protected these materials as confidential in prior PacifiCorp ECAC proceedings.
11. I declare under penalty of perjury under the laws of the State of California that the statements and information contained in this Declaration and Attachment D are true and correct.

Executed this 22nd day of November, 2024, at Portland, Oregon.



Michael Wilding
Vice President, Energy Supply Management
PacifiCorp

ATTACHMENT D

PACIFICORP MATRIX OF CONFIDENTIAL REDACTIONS

PACIFICORP MATRIX OF CONFIDENTIAL REDACTIONS
Advice Letter No. 751-E

Redacted Information (selected or entirety)	Category of Confidentiality	Basis for Protection
Attachment B, "GHG Allowance Costs_Chehalis_Workpaper_CONF.xlsx" Spreadsheet, tab "Monthly WA CCA Costs" - Rows 7-30	D.06-06-066, IOU Appendix: recorded resource costs, forecast resource costs (allowances eligible under the Washington State CCA program), and resource planning information (allowance bidding strategies) GO 66D – market sensitive information and confidential information	Contains confidential information in the form of actual and forecast accruals of CCA allowance costs paid by PacifiCorp in the Washington State CCA Program. Disclosure prohibited by WAC 173-446-317.

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 22nd of November, 2024, at Portland, OR, provided via email, a true and correct copy of PacifiCorp's Advice Letter 751-E to the following:

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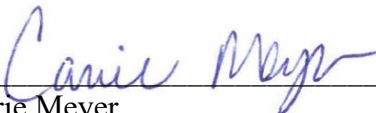
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Carrie Meyer
Adviser, Regulatory Operations

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

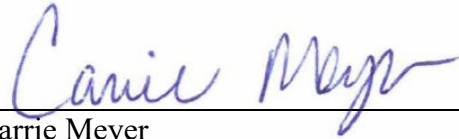
Application of PacifiCorp (U901E) for Approval
of its 2024 Energy Cost Adjustment Clause and
Greenhouse Gas-Related Forecast and
Reconciliation of Costs and Revenue.

Application No. 23-09-008
(Filed September 15, 2023)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **PacifiCorp (U 901 E) Advice Letter No. 751-E** on all known parties to A.23-09-008 by transmitting an e-mail message with the document attached to each person named in the official service list.

Executed on November 22, 2024 at Portland, Oregon.



Carrie Meyer
Adviser, Regulatory Operations



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

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FILER: PACIFICORP
LIST NAME: LIST
LAST CHANGED: NOVEMBER 7, 2024**

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