

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

In the Matter of the Application of PacifiCorp
(U 901 E) for Approval of its 2022 Energy Cost
Adjustment Clause and Greenhouse Gas-Related
Forecast and Reconciliation of Costs and Revenue

Application No. 21-08-____
(Filed August 2, 2021)

**APPLICATION OF PACIFICORP (U 901 E) FOR APPROVAL OF ITS 2022 ENERGY
COST ADJUSTMENT CLAUSE AND GREENHOUSE GAS-RELATED FORECAST
AND RECONCILIATION OF COSTS AND REVENUE**

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Date: August 2, 2021

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I. INTRODUCTION

In accordance with Rules 2.1 and 3.2,¹ PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) respectfully submits this application requesting approval to decrease both the Balancing Rate and the Offset Rate under its Energy Cost Adjustment Clause (ECAC) that are currently in effect, which were approved in Decision (D.) 20-12-004.^{2,3} Consistent with D.12-12-033, D.13-12-041, and D.14-10-033 issued by the California Public Utilities Commission (Commission), PacifiCorp also requests to update both the surcharge that recovers the costs for the procurement of greenhouse gas (GHG) allowances for its retail compliance obligation under California's Cap and Trade Program, and the California Climate Credit that returns revenue from the sale of GHG allowances to eligible customer classes. PacifiCorp also requests a waiver of certain requirements in the Commission's Decision, D.20-12-004, issued in the Company's 2020

¹ Unless otherwise specified, all citations to a rule are to the Commission's Rules of Practice and Procedure.

² The ECAC was initially authorized as part of PacifiCorp's 2005 general rate case. *See* D.06-12-011. The Commission authorized continued use of the ECAC as part of PacifiCorp's 2019 general rate case. *See* D.20-02-025.

³ In D.20-12-004, the Commission approved the Offset and Balancing Rates as proposed in Application (A.) 19-08-002. The Offset and Balancing Rates proposed in the 2021 ECAC, A.20-08-002, are still pending before the Commission.

ECAC because of new modeling software used to forecast net power costs (NPC) for this filing which make the need for those requirements in the Decision obsolete.

As described in more detail below, based on rates currently in effect, PacifiCorp requests an overall rate decrease of \$2.0 million or 1.9 percent for the combined effect of the proposed changes in its ECAC rates and GHG cost recovery rates. This decrease is comprised of a decrease in the ECAC Balancing Rate of approximately \$2.4 million compared to current rates, a decrease in the ECAC Offset Rate of approximately \$3.0 million from the amount currently in rates, and an increase of approximately \$3.4 million in the GHG allowance costs to be recovered in rates.

The estimated combined effect of the proposed ECAC and GHG cost recovery rates is summarized by customer class in Table 1 below:

Table 1: Proposed Price Changes by Customer Class

Customer Class	Proposed Price Change	
	Dollars	Percent (%)
Residential	-\$901,000	-1.6%
Commercial/Industrial	-\$872,00	-2.3%
Irrigation	-\$270,000	-2.0%
Lighting	\$1,000	0.1%
Overall	-\$2,042,000	-1.9%

The industry and small business assistance factors provided in D.13-12-002 do not extend past the year 2020. Therefore, for this filing, the Company used the small business assistance factor for 2020 provided in Appendix 2 of D.13-12-002 and continued for use in 2021 which was approved by D.20-10-022. Thus, in this application the Small Business customers would receive a California Climate Credit in 2022, which offsets 50 percent of the surcharge they will pay in 2022 for GHG cost recovery. The Company also requests from the Commission further guidance

as to the proper assistance factor to be used to calculate the GHG revenue allocation for small business customers going forward.⁴ The proposed semi-annual residential California Climate Credit for 2022 is \$154.58.

The changes to the ECAC Balancing Rate, ECAC Offset Rate and GHG cost recovery is discussed in Section III below.

II. BACKGROUND

A. ECAC

On November 29, 2005, PacifiCorp filed a general rate case application, A.05-11-022, with the Commission. As part of its application, PacifiCorp requested authority to implement an ECAC to allow for timely and efficient recovery of its NPC. In D.06-12-011, the Commission approved A.05-11-022 and adopted the terms of two settlements, including PacifiCorp's proposed ECAC. As directed by the Commission, PacifiCorp filed revised tariff sheets implementing the ECAC by advice letter on December 21, 2006, which became effective January 1, 2007. The use of the ECAC mechanism was continued in D.20-02-025, which was the decision in PacifiCorp's 2019 general rate case (2019 Rate Case). The Commission has approved PacifiCorp's annual applications under the ECAC. The ECAC Application is filed annually on August 1.

B. GHG Allowance Costs and Revenues

In 2006, the California Legislature passed Assembly Bill (AB) 32, the Global Warming Solutions Act, which required California to develop regulations that will reduce GHG emissions to 1990 levels by 2020 (Cap and Trade Program). The Cap and Trade Program, administered by the California Air Resources Board (ARB), is one element of achieving this goal. ARB

⁴ See PAC/600, the direct testimony of Judith M. Ridenour. An upcoming decision in Rulemaking (R.) 20-05-002 may change how the credit is applied to Small Business customers.

encourages the reduction of GHG emissions by placing a cap on the amount of GHG emissions a facility can emit. This is regulated through the implementation of GHG emissions allowances or permits. Under California's Cap and Trade Program, starting in 2013, ARB allocated PacifiCorp and other California electric utilities GHG emissions allowances. PacifiCorp is required to sell all of its allocated GHG emissions allowances at auction and return the revenue from the sale to its eligible customers, less some revenue to cover administrative and outreach costs and fund energy efficiency programs.⁵ The revenue is returned to residential customers through the California Climate Credit paid twice a year in April and October. PacifiCorp and other California electric utilities must also buy a sufficient number of GHG emissions allowances to cover their annual compliance obligation under the program. The costs for buying GHG emissions allowances to meet its retail compliance obligations are collected from all California customers and are not included in PacifiCorp's ECAC rates.

On December 20, 2012, the Commission issued D.12-12-033, which, among other things, adopted a methodology for allocating GHG allowance revenues to eligible customers and directed utilities to record GHG allowance costs and estimated GHG allowance revenues to certain balancing accounts. On October 16, 2014, the Commission issued D.14-10-033,

⁵ See Administrative Law Judge Ruling issued March 18, 2016 in R.14-07-002, directing utilities to set aside five percent of 2016 GHG Allowance proceeds and ten percent of 2017 GHG Allowance proceeds for clean energy programs associated with the implementation of AB 693. The Ruling at page 5 further stated "The directions for ERRAs and ECAC filings given in this ruling will continue to apply unless they are explicitly changed by a subsequent ruling or Commission decision." Accordingly, PacifiCorp set aside these amounts for 2016, 2017, and 2018, in its 2018 ECAC Application (A.17-08-005). D.17-12-022, issued on December 14, 2017, PacifiCorp was directed to set aside ten percent of the proceeds from the sale of greenhouse gas allowances starting with the 2018 ECAC for use in the Solar on Multifamily Affordable Housing Program. In compliance with D.17-12-022, in its 2019 (A.18-08-001), 2020 ECAC (A.19-08-002), 2021 (A.20-08-002), and 2022 ECAC, PacifiCorp set aside ten percent of the forecast GHG allowance proceeds. See Confidential Exhibit PAC/605.

directing all utilities, beginning in 2015, to file their annual GHG applications as part of their Energy Resource Recovery Account (ERRA) or ECAC application.⁶

III. DESCRIPTION OF REQUEST

As explained in more detail below, in this application PacifiCorp is requesting authorization to update the following rates for 2022:

- ECAC Balancing Rate;
- ECAC Offset Rate;
- Carbon Pollution Permit Cost Surcharge that recovers the costs for the procurement of GHG allowances; and
- California Climate Credit that returns the revenue from the sale of GHG allowances.

A. ECAC

PacifiCorp respectfully requests that the Commission authorize PacifiCorp to update its ECAC rates effective January 1, 2022. PacifiCorp requests a Balancing Rate of \$4.25 per megawatt-hour (MWh) and an Offset Rate of \$25.15 per MWh, effective January 1, 2022. As previously discussed, based on rates currently in effect (approved in D.20-12-004), the 2022 ECAC proposed change to the Balancing Rate results in a rate decrease of \$2.4 million and the proposed change to the Offset Rate results in a rate decrease of \$3.0 million for an overall decrease in the ECAC rates of approximately \$5.4 million. Rate impacts are calculated based on present rates which do not reflect the proposed ECAC rates from the Company's pending 2021 ECAC in A.20-08-002. A comparison of the Offset and Balancing Rates approved in D.20-12-

⁶ See D.14-10-033, page 30.

004, proposed in the pending 2021 ECAC, and proposed in this Application is reflected in Table 2 below.

Table 2: Comparison of Balancing and Offset Rates

	2020 ECAC approved in D.20-12-004	2021 ECAC Proposed in A.20.08-002*	2022 ECAC Proposed in this Application
Balancing Rate	\$7.50/MWh	\$1.05/MWh	4.25/MWh
Offset Rate	\$29.21/MWh	\$23.88/MWh	\$25.15/MWh
* ECAC portion of A.20-08-002 is currently pending before the Commission			

The following components are included in the ECAC:

- (1) Net power costs;
- (2) Fuel stock carrying charge;
- (3) ARB implementation fees⁷ and mandatory reporting verification costs⁸ (collectively referred to in this application as ARB Administrative Costs);
- (4) Net metering surplus compensation;
- (5) Purchase of renewable energy credits (RECs) for renewables portfolio standard (RPS) compliance;
- (6) A credit for renewable energy production tax credits (PTCs);⁹ and
- (7) Start-up fuels costs.¹⁰

⁷ ARB estimates the costs for administering the AB 32 emissions reduction program annually. GHG emitters subject to the AB 32 GHG program are required to cover these costs. Consistent with the treatment in the ECAC for years 2013 through 2021 ECAC, PacifiCorp has included these costs in its ECAC.

⁸ ARB requires a certified third-party independent auditor to verify and attest to the annual greenhouse gas emission report(s) submitted to ARB. Consistent with the treatment in the ECAC for the years 2013 through 2021, PacifiCorp has included these costs in its ECAC.

⁹ In D.20-02-025, the Commission approved PacifiCorp's proposal to include PTCs and start-up fuel costs as part of the ECAC because they are closely related to NPC.

¹⁰ *Id.*

The benefits realized through PacifiCorp's participation in the California Independent System Operator Energy Imbalance Market are embedded in actual NPC. The components of the ECAC and the factors affecting PacifiCorp's NPC are described in the direct testimony of Mr. Douglas R. Staples (Exhibit PAC/100).

1) ECAC Balancing Rate for 2022

NPC are defined as the sum of fuel expenses, wholesale purchase power expenses and wheeling expenses, less wholesale sales revenue. The ECAC provides PacifiCorp the opportunity to recover NPC in a timely and efficient manner, which allows PacifiCorp to continue to provide adequate, safe, and reliable service to its California customers.¹¹

Rates for NPC are unbundled from other rates and are collected through the Energy Cost Adjustment Clause Tariff Rate Rider, Schedule ECAC-94. As authorized by the Commission in D.06-12-011, energy costs and revenues subject to the ECAC are accounted for in the ECAC balancing account. The ECAC balancing account is intended to be recovered through the Balancing Rate, which is presented for approval through the annual ECAC filing.

The ECAC includes two rate components: the Balancing Rate and the Offset Rate. The Balancing Rate is the rate that either returns to or recovers from customers the total accumulated deferral in the ECAC balancing account. The ECAC allows dollar-for-dollar recovery of actual NPC and fuel stock carrying charge. There is a monthly true-up of the forecasted NPC currently in rates with actual NPC. The Balancing Rate is updated each year if the new rate varies from the current rate by five percent or more. In this case, the Balancing Rate also includes a dollar-

¹¹ Joint Motion by PacifiCorp and Division of Ratepayer Advocates for Adoption of Settlement Agreement on Revenue Requirement Issues in A.05-11-022, at p. 10.

for-dollar recovery of costs associated with ARB Administrative Costs, net metering surplus compensation, and purchases of RECs for RPS compliance.¹²

PacifiCorp proposes a Balancing Rate effective January 1, 2022, of \$4.25 per MWh, including PacifiCorp's billing factor.¹³ When compared to the Balancing Rate currently in effect, the proposed change exceeds the five percent threshold.

2) ECAC Offset Rate for 2021

The second component of the ECAC, the Offset Rate, allows PacifiCorp to reset rates to reflect the forecast of NPC and fuel stock carrying charge for the upcoming year. To determine updated NPC, PacifiCorp incorporates updates to its:

- (1) forward price curve;
- (2) forecast loads;
- (3) normalized hydro generation;
- (4) forecast coal costs;
- (5) wholesale sales and purchases of electricity and natural gas;
- (6) thermal plant capabilities; and
- (7) wheeling expenses.

The Offset Rate also includes costs projected in 2022 associated with ARB Administrative Costs and RECs purchased for RPS compliance.¹⁴ A change in the Offset Rate can be made if the change in NPC for the upcoming twelve months exceeds five percent.¹⁵

¹² Exhibit PAC/101 and Confidential Exhibit PAC/106.

¹³ Exhibit PAC/100 at page 6.

¹⁴ See Exhibit PAC/101 and Confidential Exhibit PAC/106.

¹⁵ See D.06-12-011, 2.3.1 Energy Cost Adjustment Clause at Attachment A, p. 6; *see also* A.05-11-022, Joint Motion by PacifiCorp and Division of Ratepayer Advocates for Adoption of Settlement Agreement on Revenue Requirement Issues, Division of Ratepayer Advocates, Report of the Results of Operations for PacifiCorp, General Rate Case Test Year 2007, at 4-11.

PacifiCorp proposes an Offset Rate effective January 1, 2022, of \$25.15 per MWh. California's allocated share of forecast NPC in the 2022 ECAC is approximately \$22.3 million. The change in NPC compared to forecast NPC in the 2021 ECAC is an increase of 4.1 percent. However, as compared to the amount in present ECAC rates approved in D.20-12-004, the change in the Offset Rate for 2022 results in a rate decrease of approximately \$5.1 million, which exceeds the five percent threshold.

3) Waiver Request of Certain Requirements in D.20-12-004

In previous annual ECAC filings, PacifiCorp used the Generation and Regulation Initiatives Tool (GRID), which is a production cost model, to forecast NPC. GRID simulated the operation of the Company's power system on an hourly basis. However, because of the limitations in the GRID model, PacifiCorp needed to engage in an iterative process to ensure the optimal marginal costs used for the coal plant dispatch were reflective of the Company's coal supply agreements. In D.20-12-004, the Commission stated that "[s]ince PacifiCorp must pay the full price of fuel for any purchases below minimum take requirements, we agree that ratepayers are likely to benefit from ensuring all minimum take requirements are met ..."¹⁶ To ensure proper transparency of the adjustments made to GRID, the Commission directed PacifiCorp to include in its ECAC applications going forward:

1. information on the marginal fuel cost assumed for each coal plant, the specific coal plants where adjustments were made to align forecasted generation with minimum take provisions, and the magnitude of adjustments made;
2. a GRID model run that depicts the NPC when adjustments are made to the Dispatch Tier meet minimum take provisions;
3. a GRID model run that depicts the NPC when the Dispatch Tier is based purely on marginal costs; and

¹⁶ D.20-12-004 at 16.

4. a GRID model run that depicts the NPC when average fuel costs are utilized to forecast unit dispatch. PacifiCorp shall include this information.¹⁷

For the 2022 ECAC, PacifiCorp has transitioned to a new NPC modeling tool, Aurora, a third-party electric modeling and forecasting application. The Aurora model has the capability to model multiple tiered pricing contracts and volumetric contract provisions and has neither a “dispatch tier” nor a “costing tier” as GRID did. Because of the modeling enhancements gained by switching to the Aurora model, which does not make use of dispatch and costing tiers, the iterative adjustments to the GRID dispatch tier to account for the minimum take provisions of the coal supply agreements are not required to calculate NPC for the 2022 ECAC. As a result, there are no adjustments resulting from the iterative process used in previous ECACs to identify and quantify. Further, the previously ordered studies noted above are no longer relevant given the elimination of the iterative process or needed given the enhanced modeling provided by Aurora.¹⁸ For a discussion of the Aurora model and the directives in D.20-12-004, please see Mr. Staples’ direct testimony.

Therefore, the Company requests that the Commission waive these requirements from D. 20-12-004 for this and future ECAC applications.

B. Costs and Revenues Associated with the Purchase and Sale of GHG Allowances

Consistent with D.14-10-033, PacifiCorp has included in this application its forecast GHG allowance costs to be recovered from customers in 2022 and the California Climate Credit to be distributed to eligible customers in 2022.

GHG allowance costs associated with PacifiCorp’s retail compliance obligation under California’s Cap and Trade program are recovered from customers through Schedule GHG-92,

¹⁷ *Id.*, at 16-17. Pursuant to D.20-12-004, PacifiCorp provided this information in the 2021 ECAC as supplemental testimony on February 5, 2021.

¹⁸ The marginal costs fuel costs assumed for each coal plant are included in Mr. Staples’ workpapers.

Surcharge to Recover Greenhouse Gas Carbon Pollution Permit Cost (GHG Surcharge). As part of this application, the Company requests authorization to update the GHG Surcharge effective January 1, 2022, as described in the supporting testimony of Company witnesses Ms. Mary M. Wiencke (Exhibit PAC/200) and Ms. Judith M. Ridenour (Exhibit PAC/600). As described in more detail in the direct testimony of Ms. Wiencke, these costs consist of a true-up related to actual GHG allowance costs and related interest set forth in the Company's 2021 Application (A.20-08-002) and a forecast of 2022 GHG allowance costs. The impact of the proposed change to the GHG Surcharge is an overall rate increase of \$3.4 million.

PacifiCorp also respectfully requests authorization to distribute to eligible customers the California Climate Credit as described in the supporting testimony provided by Ms. Wiencke (Exhibit PAC/200) and Ms. Ridenour (Exhibit PAC/600).

The amount to be distributed consists of:

- (1) a true-up related to actual GHG allowance revenue through May 31, 2021, and related interest;
- (2) a forecast of 2022 GHG allowance revenue;
- (3) a true-up related to actual customer outreach and administrative costs through May 31, 2021;
- (4) a forecast of customer outreach and administrative costs for 2022; and
- (5) funds set aside for energy efficiency programs developed under AB 693.

The GHG allowance revenue and reconciliation process is described in more detail in the direct testimony and supporting exhibits of Ms. Wiencke.¹⁹ Customer outreach costs are discussed in more detail in the direct testimony and supporting exhibits of Ms. Ashley Rask.²⁰

¹⁹ Confidential Exhibits PAC/200 and PAC/205 through PAC/209.

²⁰ Exhibits PAC/300 through PAC/304.

Administrative costs are discussed in more detail in the direct testimony and supporting exhibits of Mr. Anthony B. Worthington.²¹

As discussed in Ms. Ridenour's testimony and supporting exhibits, the GHG allowance revenue, less administrative and outreach costs and funding for energy efficiency programs, is first returned to PacifiCorp's small business customers.²² Based on the most recently approved small business assistance factor approved by the Commission in D.13-12-002 and continued for use in 2021 by D.20-10-022, small business customers will receive a monthly kilowatt-hour based California Climate Credit that offsets 50 percent of the GHG allowance costs they pay.²³ The total amount of the proposed small business California Climate Credit to be distributed in 2022 is approximately \$0.6 million. The remainder of the revenue is returned to residential customers through the semi-annual on-bill California Climate Credit distributed in April and October of each year. The total amount of the proposed residential California Climate Credit to be distributed in 2022 is approximately \$11.1 million. The proposed residential semi-annual, per-household California Climate Credit for 2022 is \$154.58.

IV. STATUTORY AND REGULATORY REQUIREMENTS

A. Applicant and Correspondence (Rules 2.1(a) and (b))

PacifiCorp is a public utility organized and existing under the laws of the state of Oregon. PacifiCorp engages in the business of generating, transmitting, and distributing electric energy in portions of northern California and in Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp's principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232.

²¹ Exhibits PAC/400 through PAC/403.

²² See Exhibits PAC/600 through PAC/607.

²³ An upcoming decision in R. 20-05-002 may change how the California Climate Credit is applied to small business customers. PacifiCorp will update proposed 2022 California Climate Credits as appropriate once the final decision in R.20-05-002 is issued.

Communications regarding this application should be addressed to:

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In addition, PacifiCorp respectfully requests that all data requests in this case be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

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

B. Statutory and Procedural Authority (Rule 2.1)

Rule 2.1 requires that all applications state clearly and concisely the authorization or relief sought, cite by appropriate reference the statutory provision or other authority under which Commission authorization or relief is sought, and be verified by the applicant. The relief being sought is summarized in Sections I through IV and is further described in the testimony, exhibits, and appendices supporting this application. The statutory and other authority under which this relief is being sought includes Rules 2.1 and 3.2, Sections 451, 454, and 701 of the California Public Utilities Code, and this Commission's prior decisions, orders, and resolutions. An officer of PacifiCorp has verified this application as required by Rules 1.11 and 2.1.

C. Proposed Categorization, Need for Hearing, Issues to be Considered, Relevant Safety Considerations, and Proposed Schedule (Rule 2.1(c))

1. Proposed Category of Proceeding

Rule 2.1(c) requires PacifiCorp to state “[t]he proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule.” PacifiCorp proposes that the Commission classify this proceeding as “ratesetting.” The issues in this proceeding relate to the proposed rate decrease necessary to allow PacifiCorp to recover its NPC and GHG allowance costs in 2022. This application also includes the proposed California Climate Credit for 2022.

2. Need for Hearing

If no party objects to the proposed rates, hearings may not be necessary. PacifiCorp’s application and the supporting appendices, testimony, and exhibits constitute a sufficient record for the Commission to rule on PacifiCorp’s ECAC without the need for hearings.

3. Issues to be Considered and Relevant to Safety Considerations

The issues to be considered are described in this Application and the accompanying testimony, including the attached appendices.

In D.16-01-017, the Commission amended Rule 2.1(c) to require that applications clearly state the “relevant safety considerations.” The Company is committed to promoting the health, safety, comfort and convenience of customers and the public at large. Safety for PacifiCorp employees, customers, and stakeholders is one of PacifiCorp’s six core principles. PacifiCorp has developed and implemented various programs to help customers, employees, and stakeholders understand their own personal safety. In 2012 PacifiCorp received Prestigious Member Recognition from the National Safety Council for holding safety as a core value and making safety a priority in business. In 2013, 2015, and 2016 PacifiCorp received the

Occupational Excellence Achievement Award from the National Safety Council for working to reduce on the job injuries. PacifiCorp was recognized for its safety achievement by the Edison Electric Institute by being in the top 1 percent of the safest electrical utilities in America for 2015. PacifiCorp also holds its contractors to a high standard of safety by requiring its contractors to register with a third-party evaluator of the contractor's safety performance.

The Company complies with all applicable safety codes, including, but not limited to, the National Electric Safety Code, the Occupational Health and Safety Act, and any applicable state health and safety act requirements, at all of its generation facilities. Certain safety codes may also be applicable to the operation of the Company's transmission and distribution facilities. PacifiCorp has developed standards that meet or exceed the National Electrical Safety Code. Employees are trained in work practice regulations along with Company construction standards to the highest standards and consistency.

The Company also works to develop teamwork to mitigate safety risks and has developed and implemented programs to continue improvement in safety. The Company continuously communicates safety goals in order to stay consistently on message across the organization. These programs include training and communicating from the top down, consistently delivering the same safety message and programs to all locations, and auditing the communications and programs. The Company sends daily emails to all of its employees noting accident reports and containing general reminders about safety. Other examples of the Company's commitment to safety include periodic emails with general safety tips for workplace and personal safety, safety committees for each floor of its corporate offices and field offices, annual safety training requirements which are linked to each employee's performance review, daily hazard assessment meetings for field offices, and annual evacuation drills.

The Company prioritizes safety for all resources and to the benefit of all employees, customers, and stakeholders.

4. Proposed Schedule

PacifiCorp proposes the following schedule, which allows for expedited Commission resolution of the Application:

Application Filed	August 2, 2021
Protest/Responses to Application	30 days after notice of Application published in Daily Calendar
Prehearing Conference	September 21, 2021
Scoping Memo	October 5, 2021
Proposed Decision	November 9, 2021
Final Commission Decision	December 9, 2021
Rates Effective	January 1, 2022

D. Organization and Qualification to Transact Business (Rule 2.2)

A certified copy of PacifiCorp's Articles of Incorporation, as amended and presently in effect, was filed with the Commission in A.97-05-011, which resulted in Commission issuance of D.97-12-093 and is incorporated by reference under Rule 2.2.

E. Balance Sheet and Income Statement (Rule 3.2(a)(1))

A copy of PacifiCorp's recent financial statements, contained in the Quarterly Report on Form 10-Q, filed with the Securities and Exchange Commission (SEC), for the period ending March 31, 2021, is included as Appendix A.

F. Present and Proposed Rates (Rule 3.2(a)(2) and (3))

A statement of PacifiCorp's present and proposed rates is included as Appendix B.

G. Summary of Earnings (Rule 3.2(a)(5))

The statement of earnings included in this application as Appendix C is stated on a California-specific basis.

H. List of Appendices, Testimony, and Exhibits

PacifiCorp's submissions to support this application include the following:

Appendix A	PacifiCorp Form 10-Q for the period ending March 31, 2021
Appendix B	Statement of Present and Proposed Rates
Appendix C	Summary of PacifiCorp's Earnings ending December 31, 2020
Exhibits PAC/100	Direct Testimony of Douglas R Staples
PAC/101	California ECAC Offset/Balancing Rate Calculation
PAC/102	Net Power Cost Analysis—Adjusted Actual 2019 Net Power Costs
PAC/103	Net Power Cost Analysis—Adjusted Actual/Projected 2020 Net Power Costs
PAC/104	Net Power Cost Analysis—Projected 2020 Net Power Costs
PAC/105	2021 California-allocated Net Power Costs
PAC/106	ARB Administrative Costs (Confidential)
Exhibits PAC/200	Direct Testimony of Mary M. Wiencke (Confidential)
PAC/201	Commission Template C: Weighted Average Cost of Compliance Instruments (Confidential)
PAC/202	Commission Template D-2: Annual GHG Emissions and Associated Compliance Obligation (Confidential)
PAC/203	Summary of the GHG Allowance Costs Sub-Balancing Account (Confidential)
PAC/204	2022 Forecast Compliance Obligation and GHG Allowance Costs (Confidential)
PAC/205	2020 Recorded GHG Allowance Revenue (Confidential)
PAC/206	2021 Recorded/Forecast GHG Allowance Revenue (Confidential)
PAC/207	Summary of the GHG Allowance Revenue Balancing Account (Confidential)
PAC/208	2022 Forecast GHG Allowance Revenue (Confidential)
PAC/209	Commission Template D-5: History of Revenues, Costs, and Emissions Intensity (Confidential)
Exhibits PAC/300	Direct Testimony of Ashley Rask
PAC/301	2013 – 2021 Recorded/Forecast Customer Outreach Costs
PAC/302	2022 Customer Outreach Activities and Estimated Costs
PAC/303	2022 Forecast Customer Outreach Costs
PAC/304	Commission Template D-3: Detail of Outreach Costs
Exhibits PAC/400	Direct Testimony of Anthony B. Worthington
PAC/401	2013 – 2021 Recorded/Forecast Administrative Costs
PAC/402	2022 Forecast Administrative Costs
PAC/403	Commission Template D-3: Detail of Administrative Costs

Exhibits PAC/500	Direct Testimony of Dana M. Ralston (Highly Confidential)
Exhibits PAC/600	Direct Testimony of Judith M. Ridenour
PAC/601	Calculation of Proposed ECAC Adjustment Rates
PAC/602	GHG Allowance Costs to be Recovered in Rates (Confidential)
PAC/603	GHG Allowance Revenue to be Distributed Through the California Climate Credit
PAC/604	Calculation of Proposed GHG Allowance Costs Surcharge and California Climate Credit Rates
PAC/605	Commission Template D-1: Annual Allowance Revenue Receipts and Customer Returns (Confidential)
PAC/606	Commission Template D-4: Forecast Revenue Requirement and Revenues by Rate Schedule
PAC/607	Effects of Proposed Rate Change Distributed by Rate Schedule

I. Public Notice (Rule 3.2(b), (c) and (d))

Certain cities and counties in the state of California will be affected by the rate changes resulting from this application. This includes the cities and towns of Yreka, Crescent City, Alturas, Mount Shasta, Weed, Dunsmuir, Fort Jones, Dorris, and Tulelake. Counties affected by this application are Siskiyou, Del Norte, Modoc, and Shasta. PacifiCorp will be providing notice to customers consistent with Rule 3.2(b), (c) and (d). Notice of the filing of this application will be: (1) served on the Attorney General and the Department of General Services when the state is a customer or subscriber whose rates would be affected by the proposed change; (2) served on the County Counsel (or District Attorney if the county has no County Counsel) and County Clerk, and the City Attorney and City Clerk, listed in the current roster published by the Secretary of State in each county and city in which the proposed change in rates is to be made effective; (3) published in a newspaper of general circulation in each county in PacifiCorp's service territory within which the rate changes would be effective; (4) included with regular bills mailed to all customers affected by the proposed changes or by electronically linking to notice of

this application for customers that receive their bills electronically; and (5) served on any other persons whom PacifiCorp deems appropriate or as required by the Commission.

The bill inserts are required to include the application number assigned to this Application. Unless PacifiCorp receives the assigned application number for the Application within four days of filing, it may not be able to meet the deadline for completing the bill insert cycle within 45-days of filing the Application. Accordingly, PacifiCorp requests either: (a) expeditious assignment of an application number so that it can timely complete the bill inserts, or (b) a seven-day extension to complete this requirement.

J. Statement under Rule 3.2(a)(10)

If the Company is filing an application for authority to increase its rates, Rule 3.2(a)(10) requires PacifiCorp to state whether its request is limited to passing through to customers “only increased costs to the corporation for the services or commodities furnished by it.” The Company is requesting an increase in the GHG surcharge to recover GHG allowance costs. PacifiCorp requests permission to pass through to customers increased costs to the corporation for the services or commodities furnished by it in serving its California retail customers.

K. Commission Templates Included in Application

In compliance with D.14-10-033, D.14-10-055, and D.15-01-024, PacifiCorp has prepared, and is submitting, the following Commission templates for this Application:

- Commission Template C: Weighted Average Cost of Compliance Instruments is provided as Confidential Exhibit PAC/201 to the direct testimony of Mary M. Wiencke.
- Commission Template D-1: Annual Allowance Revenue Receipts and Customer Returns is provided as Confidential Exhibit PAC/605 to the direct testimony of Judith M. Ridenour
- Commission Template D-2: Annual GHG Emissions and Associated Compliance Obligation is provided as Confidential Exhibit PAC/202 to the direct testimony of Mary M. Wiencke.

- Commission Template D-3: Detail of Outreach and Administrative Expenses. The template provided by the Commission included outreach and administrative costs in the same table. The table has been split into two tables, one for outreach and one for administrative costs so that each table may be included as an exhibit for the appropriate Company witness. Refer to Exhibit PAC/304 to the direct testimony of Ashley Rask for the detail of outreach costs. Refer to Exhibit PAC/403 to the direct testimony of Anthony B. Worthington for detail of administrative costs.
- Commission Template D-4: Forecast Revenue Requirement and Revenues by Rate Schedule is provided as Exhibit PAC/606 to the direct testimony of Judith M. Ridenour.
- Commission Template D-5: History of Revenues, Costs, and Emissions Intensity is provided as Exhibit PAC/209 to the direct testimony of Mary M. Wiencke.

IV. CONCLUSION

Based on the information provided in this application, as well as the accompanying appendices, testimony, and exhibits, PacifiCorp respectfully requests that the Commission issue an order approving the proposed overall rate decrease to allow PacifiCorp timely recovery of its NPC through its approved ECAC and its GHG allowance surcharge. PacifiCorp also requests that the directives regarding the adjustments to the GRID and production of additional GRID runs in D.20-12-004 be waived. Finally, PacifiCorp respectfully requests approval of the California Climate Credit that returns revenue from the sale of GHG allowances to eligible customer classes.

Respectfully submitted this August 2, 2021, at San Francisco, California.



By: Carla Scarsella

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Attorneys for PacifiCorp

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

In the Matter of the Application of PacifiCorp
(U 901 E) for Approval of its 2022 Energy Cost
Adjustment Clause and Greenhouse Gas-Related
Forecast and Reconciliation of Costs and Revenue

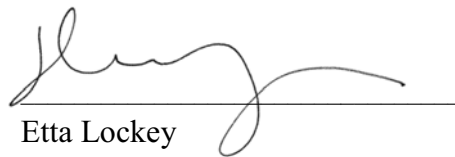
Application No. 21-08-____
(Filed August 2, 2021)

VERIFICATION

I am an officer of the applicant in the above-captioned proceeding and am authorized to make this verification on its behalf. The statements in the foregoing document are true on my own knowledge, except as to matters which are stated therein on information or belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2021, at Portland, Oregon.

A handwritten signature in black ink, appearing to read 'Etta Lockey', written over a horizontal line.

Etta Lockey
Vice President, Regulation, Customer and
Community Solutions

DECLARATION OF ETTA LOCKEY (PACIFICORP)

1. My name is Etta Lockey. My business address is 825 N.E. Multnomah Street, Suite 2000, Portland, Oregon 97232.
2. I am Vice President, Regulation, Customer and Community Solutions for PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company). PacifiCorp is a multi-jurisdictional utility providing electric retail service to customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp serves approximately 45,000 customers in portions of Del Norte, Modoc, Shasta, and Siskiyou Counties in northern California.
3. 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).
4. Section 3.2 of GO 66-D provides that when a utility submits documents for which it seeks confidential treatment to the Commission or staff of the Commission outside of a formal proceeding, the utility must mark the document or applicable portions confidential and provide the basis for the confidential treatment specified. Additionally, any such request must be accompanied by a declaration signed by an officer of the requesting company. PacifiCorp therefore is providing this declaration along with the confidential information.
5. On August 2, 2021, PacifiCorp filed an Application for approval of its Energy Cost Adjustment Clause (ECAC) and Greenhouse Gas-Related (GHG) Forecast and Reconciliation of Costs and Revenue. The application includes Exhibit PAC/106 and workpapers, supporting the direct testimony of Douglas R. Staples, the direct testimony

(PAC/200) and supporting Exhibits (PAC/201 through PAC/209) of Mary M. Wiencke, the direct testimony (PAC/500) of Dana M. Ralston, and Exhibits PAC/602, PAC/605, and workpapers supporting the direct testimony of Judith M. Ridenour, all of which include either confidential or highly confidential information.

6. PacifiCorp is asserting that certain portions of the direct testimony and exhibits are confidential. Specifically, Douglas R. Staples' Exhibit PAC/106 includes PacifiCorp's actual and forecast Air Resource Board (ARB) administrative costs. Mary M. Wiencke's testimony (PAC/200) and supporting Exhibits (PAC/201 through PAC/209) contain market-sensitive information relating to PacifiCorp's GHG emissions compliance obligation and Greenhouse Gas (GHG) allowance costs. Dana M. Ralston's testimony (PAC/500) contains information contained in coal supply agreements and supporting information. Judith M. Ridenour's Exhibits PAC/602 and PAC/605 include forecast GHG revenue costs and GHG allowance costs. These exhibits and testimony contain market-sensitive and confidential information that would reveal to vendors the prices PacifiCorp has historically paid for items related to implementation of its GHG Cap-and-Trade obligation, as well as PacifiCorp's GHG-related costs, allowances, and revenues. This confidential information would also allow parties to determine PacifiCorp's current compliance position, which in turn could be used in future auctions to drive up the price PacifiCorp pays for auction allowances. Public disclosure would also compromise PacifiCorp's ongoing procurement process as it complies with the GHG Cap-and-Trade program, which would ultimately harm customers by unnecessarily inflating the prices paid by PacifiCorp. These exhibits also contain market-sensitive information that would reveal to market participants the terms of PacifiCorp coal supply

agreements, which, if made public, would adversely affect PacifiCorp's negotiation position regarding future fuel supply agreements and would harm customers by disadvantaging the Company as it transacts in the energy supply market.

7. Accordingly, PacifiCorp is asserting a claim of confidentiality in association with the submittal of Exhibits PAC/106, PAC/200, PAC/201, PAC/202, PAC/203, PAC/204, PAC/205, PAC/206, PAC/207, PAC/208, PAC 209, PAC/500, PAC/602, PAC/605, and supporting workpapers for Douglas R. Staples and Judith M. Ridenour accompanying the Application of PacifiCorp for Approval of its 2022 ECAC and GHG-Related Forecast and Reconciliation of Costs and Revenue filed on August 2, 2021.

8. The data for which PacifiCorp seeks confidential treatment are corporate confidential information and trade secrets protected from disclosure under California law.¹

9. Information regarding requests for disclosure of the information for which PacifiCorp seeks confidential treatment should be directed to the following individuals:

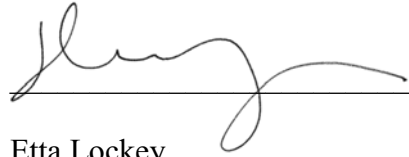
California Dockets
PacifiCorp
californiadockets@pacificorp.com

Pooja Kishore
PacifiCorp
Regulatory Affairs Manager
pooja.kishore@pacificorp.com

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

¹ Cal. Gov. Code §§ 6254 *et seq.* (e.g., Gov. Code §§ 6254(e), 6254(k), 6254.7; Cal. Evid. Code § 1060).

Executed in Portland, Oregon, on August 2, 2021.



Etta Lockey
Vice President, Regulation, Customer and
Community Solutions
PacifiCorp

APPENDIX A

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM 10-Q

☒ Quarterly Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934

For the quarterly period ended March 31, 2021

or

☐ Transition Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934

For the transition period from _____ to _____

Exact name of registrant as specified in its charter

State or other jurisdiction of incorporation or organization

Address of principal executive offices

Registrant's telephone number, including area code

IRS Employer

Identification No.

Commission
File Number

001-14881

BERKSHIRE HATHAWAY ENERGY COMPANY

94-2213782

(An Iowa Corporation)

666 Grand Avenue, Suite 500

Des Moines, Iowa 50309-2580

515-242-4300

001-05152

PACIFICORP

93-0246090

(An Oregon Corporation)

825 N.E. Multnomah Street

Portland, Oregon 97232

888-221-7070

333-90553

MIDAMERICAN FUNDING, LLC

47-0819200

(An Iowa Limited Liability Company)

666 Grand Avenue, Suite 500

Des Moines, Iowa 50309-2580

515-242-4300

333-15387

MIDAMERICAN ENERGY COMPANY

42-1425214

(An Iowa Corporation)

666 Grand Avenue, Suite 500

Des Moines, Iowa 50309-2580

515-242-4300

000-52378

NEVADA POWER COMPANY

88-0420104

(A Nevada Corporation)

6226 West Sahara Avenue

Las Vegas, Nevada 89146

702-402-5000

000-00508

SIERRA PACIFIC POWER COMPANY

88-0044418

(A Nevada Corporation)

6100 Neil Road

Reno, Nevada 89511

775-834-4011

001-37591

EASTERN ENERGY GAS HOLDINGS, LLC

46-3639580

(A Virginia Limited Liability Company)

6603 West Broad Street

Richmond, Virginia 23230

804-613-5100

N/A

(Former name or former address, if changed from last report)

Registrant	Securities registered pursuant to Section 12(b) of the Act:
BERKSHIRE HATHAWAY ENERGY COMPANY	None
PACIFICORP	None
MIDAMERICAN FUNDING, LLC	None
MIDAMERICAN ENERGY COMPANY	None
NEVADA POWER COMPANY	None
SIERRA PACIFIC POWER COMPANY	None
EASTERN ENERGY GAS HOLDINGS, LLC	None

Registrant	Name of exchange on which registered:
BERKSHIRE HATHAWAY ENERGY COMPANY	None
PACIFICORP	None
MIDAMERICAN FUNDING, LLC	None
MIDAMERICAN ENERGY COMPANY	None
NEVADA POWER COMPANY	None
SIERRA PACIFIC POWER COMPANY	None
EASTERN ENERGY GAS HOLDINGS, LLC	None

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days.

Registrant	Yes	No
BERKSHIRE HATHAWAY ENERGY COMPANY	<input checked="" type="checkbox"/>	
PACIFICORP	<input checked="" type="checkbox"/>	
MIDAMERICAN FUNDING, LLC		<input checked="" type="checkbox"/>
MIDAMERICAN ENERGY COMPANY	<input checked="" type="checkbox"/>	
NEVADA POWER COMPANY	<input checked="" type="checkbox"/>	
SIERRA PACIFIC POWER COMPANY	<input checked="" type="checkbox"/>	
EASTERN ENERGY GAS HOLDINGS, LLC	<input checked="" type="checkbox"/>	

Indicate by check mark whether the registrants have submitted electronically every Interactive Data File required to be submitted pursuant to Rule 405 of Regulation S-T (§232.405 of this chapter) during the preceding 12 months (or for such shorter period that the registrants were required to submit such files). Yes ☒ No ☐

Indicate by check mark whether the registrant is a large accelerated filer, an accelerated filer, a non-accelerated filer, a smaller reporting company, or an emerging growth company. See the definitions of "large accelerated filer," "accelerated filer," "smaller reporting company," and "emerging growth company" in Rule 12b-2 of the Exchange Act.

Registrant	Large accelerated filer	Accelerated filer	Non-accelerated filer	Smaller reporting company	Emerging growth company
BERKSHIRE HATHAWAY ENERGY COMPANY	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PACIFICORP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MIDAMERICAN FUNDING, LLC	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MIDAMERICAN ENERGY COMPANY	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NEVADA POWER COMPANY	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SIERRA PACIFIC POWER COMPANY	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EASTERN ENERGY GAS HOLDINGS, LLC	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If an emerging growth company, indicate by check mark if the registrants have elected not to use the extended transition period for complying with any new or revised financial accounting standards provided pursuant to Section 13(a) of the Exchange Act. ☐

Indicate by check mark whether the registrants are a shell company (as defined in Rule 12b-2 of the Exchange Act).

Yes ☐ No ☒

All shares of outstanding common stock of Berkshire Hathaway Energy Company are privately held by a limited group of investors. As of April 29, 2021, 76,368,874 shares of common stock, no par value, were outstanding.

All shares of outstanding common stock of PacifiCorp are indirectly owned by Berkshire Hathaway Energy Company. As of April 29, 2021, 357,060,915 shares of common stock, no par value, were outstanding.

All of the member's equity of MidAmerican Funding, LLC is held by its parent company, Berkshire Hathaway Energy Company, as of April 29, 2021.

All shares of outstanding common stock of MidAmerican Energy Company are owned by its parent company, MHC Inc., which is a direct, wholly owned subsidiary of MidAmerican Funding, LLC. As of April 29, 2021, 70,980,203 shares of common stock, no par value, were outstanding.

All shares of outstanding common stock of Nevada Power Company are owned by its parent company, NV Energy, Inc., which is an indirect, wholly owned subsidiary of Berkshire Hathaway Energy Company. As of April 29, 2021, 1,000 shares of common stock, \$1.00 stated value, were outstanding.

All shares of outstanding common stock of Sierra Pacific Power Company are owned by its parent company, NV Energy, Inc. As of April 29, 2021, 1,000 shares of common stock, \$3.75 par value, were outstanding.

All of the member's equity of Eastern Energy Gas Holdings, LLC is held indirectly by its parent company, Berkshire Hathaway Energy Company, as of April 29, 2021.

This combined Form 10-Q is separately filed by Berkshire Hathaway Energy Company, PacifiCorp, MidAmerican Funding, LLC, MidAmerican Energy Company, Nevada Power Company, Sierra Pacific Power Company and Eastern Energy Gas Holdings, LLC. Information contained herein relating to any individual company is filed by such company on its own behalf. Each company makes no representation as to information relating to the other companies.

TABLE OF CONTENTS

PART I

<u>Item 1.</u>	<u>Financial Statements</u>	<u>1</u>
<u>Item 2.</u>	<u>Management's Discussion and Analysis of Financial Condition and Results of Operations</u>	<u>2</u>
<u>Item 3.</u>	<u>Quantitative and Qualitative Disclosures About Market Risk</u>	<u>163</u>
<u>Item 4.</u>	<u>Controls and Procedures</u>	<u>163</u>

PART II

<u>Item 1.</u>	<u>Legal Proceedings</u>	<u>164</u>
<u>Item 1A.</u>	<u>Risk Factors</u>	<u>164</u>
<u>Item 2.</u>	<u>Unregistered Sales of Equity Securities and Use of Proceeds</u>	<u>164</u>
<u>Item 3.</u>	<u>Defaults Upon Senior Securities</u>	<u>164</u>
<u>Item 4.</u>	<u>Mine Safety Disclosures</u>	<u>165</u>
<u>Item 5.</u>	<u>Other Information</u>	<u>165</u>
<u>Item 6.</u>	<u>Exhibits</u>	<u>165</u>
<u>Signatures</u>		<u>168</u>

Definition of Abbreviations and Industry Terms

When used in Forward-Looking Statements, Part I - Items 2 through 3, and Part II - Items 1 through 6, the following terms have the definitions indicated.

Berkshire Hathaway Energy Company and Related Entities

BHE	Berkshire Hathaway Energy Company
Berkshire Hathaway	Berkshire Hathaway Inc.
Berkshire Hathaway Energy or the Company	Berkshire Hathaway Energy Company and its subsidiaries
PacifiCorp	PacifiCorp and its subsidiaries
MidAmerican Funding	MidAmerican Funding, LLC and its subsidiaries
MidAmerican Energy	MidAmerican Energy Company
NV Energy	NV Energy, Inc. and its subsidiaries
Nevada Power	Nevada Power Company and its subsidiaries
Sierra Pacific	Sierra Pacific Power Company and its subsidiaries
Nevada Utilities	Nevada Power Company and its subsidiaries and Sierra Pacific Power Company and its subsidiaries
Eastern Energy Gas	Eastern Energy Gas Holdings, LLC and its subsidiaries
Registrants	Berkshire Hathaway Energy Company, PacifiCorp and its subsidiaries, MidAmerican Funding, LLC and its subsidiaries, MidAmerican Energy Company, Nevada Power Company and its subsidiaries, Sierra Pacific Power Company and its subsidiaries and Eastern Energy Gas Holdings, LLC and its subsidiaries
Northern Powergrid	Northern Powergrid Holdings Company
BHE Pipeline Group	BHE GT&S, LLC, Northern Natural Gas Company and Kern River Gas Transmission Company
BHE GT&S	BHE GT&S, LLC
Northern Natural Gas	Northern Natural Gas Company
Kern River	Kern River Gas Transmission Company
BHE Transmission	BHE Canada Holdings Corporation and BHE U.S. Transmission, LLC
BHE Canada	BHE Canada Holdings Corporation
AltaLink	AltaLink, L.P.
BHE U.S. Transmission	BHE U.S. Transmission, LLC
BHE Renewables	BHE Renewables, LLC and CalEnergy Philippines
HomeServices	HomeServices of America, Inc. and its subsidiaries
Utilities	PacifiCorp and its subsidiaries, MidAmerican Energy Company, Nevada Power Company and its subsidiaries and Sierra Pacific Power Company and its subsidiaries
Domestic Regulated Businesses	PacifiCorp and its subsidiaries, MidAmerican Energy Company, Nevada Power Company and its subsidiaries, Sierra Pacific Power Company and its subsidiaries, BHE GT&S, LLC, Northern Natural Gas Company and Kern River Gas Transmission Company
GT&S Transaction	The acquisition of substantially all of the natural gas transmission and storage business of Dominion Energy and Dominion Questar, exclusive of the Questar Pipeline Group on November 1, 2020
DEI	Dominion Energy, Inc.
Questar Pipeline Group	Dominion Energy Questar Pipeline, LLC and related entities

Certain Industry Terms

2017 Tax Reform	The Tax Cuts and Jobs Act enacted on December 22, 2017, effective January 1, 2018
AFUDC	Allowance for Funds Used During Construction
AUC	Alberta Utilities Commission
BART	Best Available Retrofit Technology
COVID-19	Coronavirus Disease 2019
CSAPR	Cross-State Air Pollution Rule
D.C. Circuit	United States Court of Appeals for the District of Columbia Circuit
DEAA	Deferred Energy Accounting Adjustment
Dth	Decatherm
EBA	Energy Balancing Account
ECAM	Energy Cost Adjustment Mechanism
EPA	United States Environmental Protection Agency
FERC	Federal Energy Regulatory Commission
GAAP	Accounting principles generally accepted in the United States of America
GEMA	Gas and Electricity Markets Authority
GHG	Greenhouse Gases
GWh	Gigawatt Hour
GTA	General Tariff Application
IPUC	Idaho Public Utilities Commission
ICC	Illinois Commerce Commission
IRP	Integrated Resource Plan
IUB	Iowa Utilities Board
kV	Kilovolt
KHSA	Klamath Hydroelectric Settlement Agreement
MW	Megawatt
MWh	Megawatt Hour
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
Ofgem	Office of Gas and Electric Markets
OPUC	Oregon Public Utility Commission
PTC	Production Tax Credit
PUCN	Public Utilities Commission of Nevada
RAC	Renewable Adjustment Clause
REC	Renewable Energy Credit
RFP	Request for Proposal
RPS	Renewable Portfolio Standards
RRA	Renewable Energy Credit and Sulfur Dioxide Revenue Adjustment Mechanism
SCR	Selective Catalytic Reduction
SEC	United States Securities and Exchange Commission
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
UPSC	Utah Public Service Commission
WPSC	Wyoming Public Service Commission
WUTC	Washington Utilities and Transportation Commission

Forward-Looking Statements

This report contains statements that do not directly or exclusively relate to historical facts. These statements are "forward-looking statements" within the meaning of Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended. Forward-looking statements can typically be identified by the use of forward-looking words, such as "will," "may," "could," "project," "believe," "anticipate," "expect," "estimate," "continue," "intend," "potential," "plan," "forecast" and similar terms. These statements are based upon the relevant Registrant's current intentions, assumptions, expectations and beliefs and are subject to risks, uncertainties and other important factors. Many of these factors are outside the control of each Registrant and could cause actual results to differ materially from those expressed or implied by such forward-looking statements. These factors include, among others:

- general economic, political and business conditions, as well as changes in, and compliance with, laws and regulations, including income tax reform, initiatives regarding deregulation and restructuring of the utility industry, and reliability and safety standards, affecting the respective Registrant's operations or related industries;
- changes in, and compliance with, environmental laws, regulations, decisions and policies that could, among other items, increase operating and capital costs, reduce facility output, accelerate facility retirements or delay facility construction or acquisition;
- the outcome of regulatory rate reviews and other proceedings conducted by regulatory agencies or other governmental and legal bodies and the respective Registrant's ability to recover costs through rates in a timely manner;
- changes in economic, industry, competition or weather conditions, as well as demographic trends, new technologies and various conservation, energy efficiency and private generation measures and programs, that could affect customer growth and usage, electricity and natural gas supply or the respective Registrant's ability to obtain long-term contracts with customers and suppliers;
- performance, availability and ongoing operation of the respective Registrant's facilities, including facilities not operated by the Registrants, due to the impacts of market conditions, outages and repairs, transmission constraints, weather, including wind, solar and hydroelectric conditions, and operating conditions;
- the effects of catastrophic and other unforeseen events, which may be caused by factors beyond the control of each respective Registrant or by a breakdown or failure of the Registrants' operating assets, including severe storms, floods, fires, earthquakes, explosions, landslides, an electromagnetic pulse, mining incidents, litigation, wars, terrorism, pandemics (including potentially in relation to COVID-19), embargoes, and cyber security attacks, data security breaches, disruptions, or other malicious acts;
- the ability to economically obtain insurance coverage, or any insurance coverage at all, sufficient to cover losses arising from catastrophic events, such as wildfires where the Registrants may be found liable for property damages regardless of fault;
- a high degree of variance between actual and forecasted load or generation that could impact a Registrant's hedging strategy and the cost of balancing its generation resources with its retail load obligations;
- changes in prices, availability and demand for wholesale electricity, coal, natural gas, other fuel sources and fuel transportation that could have a significant impact on generating capacity and energy costs;
- the financial condition, creditworthiness and operational stability of the respective Registrant's significant customers and suppliers;
- changes in business strategy or development plans;
- availability, terms and deployment of capital, including reductions in demand for investment-grade commercial paper, debt securities and other sources of debt financing and volatility in interest rates;
- changes in the respective Registrant's credit ratings;
- risks relating to nuclear generation, including unique operational, closure and decommissioning risks;
- hydroelectric conditions and the cost, feasibility and eventual outcome of hydroelectric relicensing proceedings;
- the impact of certain contracts used to mitigate or manage volume, price and interest rate risk, including increased collateral requirements, and changes in commodity prices, interest rates and other conditions that affect the fair value of certain contracts;
- the impact of inflation on costs and the ability of the respective Registrants to recover such costs in regulated rates;
- fluctuations in foreign currency exchange rates, primarily the British pound and the Canadian dollar;

- increases in employee healthcare costs;
- the impact of investment performance, certain participant elections such as lump sum distributions and changes in interest rates, legislation, healthcare cost trends, mortality, morbidity on pension and other postretirement benefits expense and funding requirements;
- changes in the residential real estate brokerage, mortgage and franchising industries and regulations that could affect brokerage, mortgage and franchising transactions;
- the ability to successfully integrate the portion of the natural gas transmission and storage business acquired from DEI on November 1, 2020, and future acquired operations into a Registrant's business;
- the expected timing and likelihood of completion of the proposed transaction to acquire the remaining portion of DEI's natural gas transmission and storage business, including the ability to obtain the required clearance under the Hart-Scott-Rodino Antitrust Improvements Act of 1976, as amended;
- unanticipated construction delays, changes in costs, receipt of required permits and authorizations, ability to fund capital projects and other factors that could affect future facilities and infrastructure additions;
- the availability and price of natural gas in applicable geographic regions and demand for natural gas supply;
- the impact of new accounting guidance or changes in current accounting estimates and assumptions on the financial results of the respective Registrants; and
- other business or investment considerations that may be disclosed from time to time in the Registrants' filings with the SEC or in other publicly disseminated written documents.

Further details of the potential risks and uncertainties affecting the Registrants are described in the Registrants' filings with the SEC, including Part II, Item 1A and other discussions contained in this Form 10-Q. Each Registrant undertakes no obligation to publicly update or revise any forward-looking statements, whether as a result of new information, future events or otherwise. The foregoing factors should not be construed as exclusive.

Item 1. Financial Statements

Berkshire Hathaway Energy Company and its subsidiaries

Report of Independent Registered Public Accounting Firm	4
Consolidated Balance Sheets	5
Consolidated Statements of Operations	7
Consolidated Statements of Comprehensive Income	8
Consolidated Statements of Changes in Equity	9
Consolidated Statements of Cash Flows	10
Notes to Consolidated Financial Statements	11

PacifiCorp and its subsidiaries

Report of Independent Registered Public Accounting Firm	48
Consolidated Balance Sheets	49
Consolidated Statements of Operations	51
Consolidated Statements of Changes in Shareholders' Equity	52
Consolidated Statements of Cash Flows	53
Notes to Consolidated Financial Statements	54

MidAmerican Energy Company

Report of Independent Registered Public Accounting Firm	71
Balance Sheets	72
Statements of Operations	74
Statements of Changes in Shareholder's Equity	75
Statements of Cash Flows	76
Notes to Financial Statements	77

MidAmerican Funding, LLC and its subsidiaries

Report of Independent Registered Public Accounting Firm	85
Consolidated Balance Sheets	86
Consolidated Statements of Operations	88
Consolidated Statements of Changes in Member's Equity	89
Consolidated Statements of Cash Flows	90
Notes to Consolidated Financial Statements	91

Nevada Power Company and its subsidiaries

Report of Independent Registered Public Accounting Firm	106
Consolidated Balance Sheets	107
Consolidated Statements of Operations	108
Consolidated Statements of Changes in Shareholder's Equity	109
Consolidated Statements of Cash Flows	110
Notes to Consolidated Financial Statements	111

Sierra Pacific Power Company and its subsidiaries

Report of Independent Registered Public Accounting Firm	122
Consolidated Balance Sheets	123
Consolidated Statements of Operations	124
Consolidated Statements of Changes in Shareholder's Equity	125
Consolidated Statements of Cash Flows	126
Notes to Financial Statements	127

Eastern Energy Gas Holdings, LLC and its subsidiaries

Report of Independent Registered Public Accounting Firm	141
Consolidated Balance Sheets	142
Consolidated Statements of Operations	144
Consolidated Statements of Comprehensive Income	145
Consolidated Statements of Changes in Equity	146
Consolidated Statements of Cash Flows	147
Notes to Consolidated Financial Statements	148

Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations

<u>Berkshire Hathaway Energy Company and its subsidiaries</u>	<u>29</u>
<u>PacifiCorp and its subsidiaries</u>	<u>63</u>
<u>MidAmerican Funding, LLC and its subsidiaries and MidAmerican Energy Company</u>	<u>95</u>
<u>Nevada Power Company and its subsidiaries</u>	<u>116</u>
<u>Sierra Pacific Power Company and its subsidiaries</u>	<u>133</u>
<u>Eastern Energy Gas Holdings, LLC and its subsidiaries</u>	<u>159</u>

Berkshire Hathaway Energy Company and its subsidiaries
Consolidated Financial Section

PART I

Item 1. Financial Statements

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors and Shareholders of
Berkshire Hathaway Energy Company

Results of Review of Interim Financial Information

We have reviewed the accompanying consolidated balance sheet of Berkshire Hathaway Energy Company and subsidiaries (the "Company") as of March 31, 2021, the related consolidated statements of operations, comprehensive income, changes in equity, and cash flows for the three-month periods ended March 31, 2021 and 2020, and the related notes (collectively referred to as the "interim financial information"). Based on our reviews, we are not aware of any material modifications that should be made to the accompanying interim financial information for it to be in conformity with accounting principles generally accepted in the United States of America.

We have previously audited, in accordance with the standards of the Public Company Accounting Oversight Board (United States) (PCAOB), the consolidated balance sheet of the Company as of December 31, 2020, and the related consolidated statements of operations, comprehensive income, changes in equity, and cash flows for the year then ended (not presented herein); and in our report dated February 26, 2021, we expressed an unqualified opinion on those consolidated financial statements. In our opinion, the information set forth in the accompanying consolidated balance sheet as of December 31, 2020, is fairly stated, in all material respects, in relation to the consolidated balance sheet from which it has been derived.

Basis for Review Results

This interim financial information is the responsibility of the Company's management. We are a public accounting firm registered with the PCAOB and are required to be independent with respect to the Company in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our reviews in accordance with standards of the PCAOB. A review of interim financial information consists principally of applying analytical procedures and making inquiries of persons responsible for financial and accounting matters. It is substantially less in scope than an audit conducted in accordance with the standards of the PCAOB, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, we do not express such an opinion.

/s/ Deloitte & Touche LLP

Des Moines, Iowa
April 30, 2021

BERKSHIRE HATHAWAY ENERGY COMPANY AND SUBSIDIARIES
CONSOLIDATED BALANCE SHEETS (Unaudited)
(Amounts in millions)

	As of	
	March 31, 2021	December 31, 2020
ASSETS		
Current assets:		
Cash and cash equivalents	\$ 1,276	\$ 1,290
Restricted cash and cash equivalents	117	140
Trade receivables, net	2,416	2,107
Inventories	1,110	1,168
Mortgage loans held for sale	2,065	2,001
Other current assets	3,236	2,741
Total current assets	10,220	9,447
Property, plant and equipment, net	86,757	86,128
Goodwill	11,534	11,506
Regulatory assets	3,221	3,157
Investments and restricted cash and cash equivalents and investments	13,010	14,320
Other assets	2,780	2,758
Total assets	\$ 127,522	\$ 127,316

The accompanying notes are an integral part of these consolidated financial statements.

BERKSHIRE HATHAWAY ENERGY COMPANY AND SUBSIDIARIES
CONSOLIDATED BALANCE SHEETS (Unaudited) (continued)
(Amounts in millions)

	As of	
	March 31, 2021	December 31, 2020
LIABILITIES AND EQUITY		
Current liabilities:		
Accounts payable	\$ 1,548	\$ 1,867
Accrued interest	642	555
Accrued property, income and other taxes	515	582
Accrued employee expenses	412	383
Short-term debt	2,699	2,286
Current portion of long-term debt	2,011	1,839
Other current liabilities	1,948	1,626
Total current liabilities	9,775	9,138
BHE senior debt	12,999	12,997
BHE junior subordinated debentures	100	100
Subsidiary debt	34,351	34,930
Regulatory liabilities	7,355	7,221
Deferred income taxes	11,630	11,775
Other long-term liabilities	4,261	4,178
Total liabilities	80,471	80,339
Commitments and contingencies (Note 9)		
Equity:		
BHE shareholders' equity:		
Preferred stock - 100 shares authorized, \$0.01 par value, 4 shares issued and outstanding	3,750	3,750
Common stock - 115 shares authorized, no par value, 76 shares issued and outstanding	—	—
Additional paid-in capital	6,377	6,377
Long-term income tax receivable	(658)	(658)
Retained earnings	35,060	35,093
Accumulated other comprehensive loss, net	(1,440)	(1,552)
Total BHE shareholders' equity	43,089	43,010
Noncontrolling interests	3,962	3,967
Total equity	47,051	46,977
Total liabilities and equity	\$ 127,522	\$ 127,316

The accompanying notes are an integral part of these consolidated financial statements.

BERKSHIRE HATHAWAY ENERGY COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF OPERATIONS (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Operating revenue:		
Energy	\$ 4,849	\$ 3,634
Real estate	1,232	893
Total operating revenue	6,081	4,527
Operating expenses:		
Energy:		
Cost of sales	1,569	1,038
Operations and maintenance	934	737
Depreciation and amortization	915	809
Property and other taxes	210	151
Real estate	1,120	873
Total operating expenses	4,748	3,608
Operating income	1,333	919
Other income (expense):		
Interest expense	(530)	(483)
Capitalized interest	14	17
Allowance for equity funds	26	34
Interest and dividend income	21	20
(Losses) gains on marketable securities, net	(1,118)	27
Other, net	8	(27)
Total other income (expense)	(1,579)	(412)
(Loss) income before income tax benefit and equity loss	(246)	507
Income tax benefit	(535)	(184)
Equity loss	(179)	(18)
Net income	110	673
Net income attributable to noncontrolling interests	106	3
Net income attributable to BHE shareholders	4	670
Preferred dividends	38	—
(Loss) earnings on common shares	\$ (34)	\$ 670

The accompanying notes are an integral part of these consolidated financial statements.

BERKSHIRE HATHAWAY ENERGY COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF COMPREHENSIVE INCOME (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Net income	\$ 110	\$ 673
Other comprehensive income (loss), net of tax:		
Unrecognized amounts on retirement benefits, net of tax of \$4 and \$11	7	34
Foreign currency translation adjustment	91	(548)
Unrealized gains (losses) on cash flow hedges, net of tax of \$5 and \$(10)	14	(33)
Total other comprehensive income (loss), net of tax	112	(547)
Comprehensive income	222	126
Comprehensive income attributable to noncontrolling interests	106	3
Comprehensive income attributable to BHE shareholders	\$ 116	\$ 123

The accompanying notes are an integral part of these consolidated financial statements.

BERKSHIRE HATHAWAY ENERGY COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CHANGES IN EQUITY (Unaudited)
(Amounts in millions)

	BHE Shareholders' Equity							
	Preferred Stock	Common Stock	Additional Paid-in Capital	Long-term Income Tax Receivable	Retained Earnings	Accumulated Other Comprehensive Loss, Net	Noncontrolling Interests	Total Equity
Balance, December 31, 2019	\$ —	\$ —	\$ 6,389	\$ (530)	\$ 28,296	\$ (1,706)	\$ 129	\$32,578
Net income	—	—	—	—	670	—	3	673
Other comprehensive loss	—	—	—	—	—	(547)	—	(547)
Common stock purchases	—	—	(6)	—	(120)	—	—	(126)
Distributions	—	—	—	—	—	—	(5)	(5)
Other equity transactions	—	—	(1)	—	—	—	—	(1)
Balance, March 31, 2020	<u>\$ —</u>	<u>\$ —</u>	<u>\$ 6,382</u>	<u>\$ (530)</u>	<u>\$ 28,846</u>	<u>\$ (2,253)</u>	<u>\$ 127</u>	<u>\$32,572</u>
Balance, December 31, 2020	\$ 3,750	\$ —	\$ 6,377	\$ (658)	\$ 35,093	\$ (1,552)	\$ 3,967	\$46,977
Net income	—	—	—	—	4	—	106	110
Other comprehensive income	—	—	—	—	—	112	—	112
Preferred stock dividend	—	—	—	—	(38)	—	—	(38)
Distributions	—	—	—	—	—	—	(113)	(113)
Other equity transactions	—	—	—	—	1	—	2	3
Balance, March 31, 2021	<u>\$ 3,750</u>	<u>\$ —</u>	<u>\$ 6,377</u>	<u>\$ (658)</u>	<u>\$ 35,060</u>	<u>\$ (1,440)</u>	<u>\$ 3,962</u>	<u>\$47,051</u>

The accompanying notes are an integral part of these consolidated financial statements.

BERKSHIRE HATHAWAY ENERGY COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CASH FLOWS (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Cash flows from operating activities:		
Net income	\$ 110	\$ 673
Adjustments to reconcile net income to net cash flows from operating activities:		
Losses (gains) on marketable securities, net	1,118	(27)
Depreciation and amortization	927	821
Allowance for equity funds	(26)	(34)
Equity loss, net of distributions	221	29
Changes in regulatory assets and liabilities	(9)	—
Deferred income taxes and amortization of investment tax credits	(135)	47
Other, net	9	63
Changes in other operating assets and liabilities, net of effects from acquisitions:		
Trade receivables and other assets	(249)	(118)
Derivative collateral, net	14	(19)
Pension and other postretirement benefit plans	(21)	(23)
Accrued property, income and other taxes, net	(453)	(364)
Accounts payable and other liabilities	19	117
Net cash flows from operating activities	<u>1,525</u>	<u>1,165</u>
Cash flows from investing activities:		
Capital expenditures	(1,295)	(1,356)
Purchases of marketable securities	(128)	(188)
Proceeds from sales of marketable securities	104	180
Equity method investments	(26)	(153)
Other, net	(29)	43
Net cash flows from investing activities	<u>(1,374)</u>	<u>(1,474)</u>
Cash flows from financing activities:		
Proceeds from BHE senior debt	—	3,231
Repayments of BHE senior debt	(450)	(350)
Common stock purchases	—	(126)
Proceeds from subsidiary debt	—	1,093
Repayments of subsidiary debt	(26)	(1,347)
Net proceeds from (repayments of) short-term debt	409	(1,109)
Distributions to noncontrolling interests	(115)	(2)
Other, net	(9)	(32)
Net cash flows from financing activities	<u>(191)</u>	<u>1,358</u>
Effect of exchange rate changes	<u>1</u>	<u>(13)</u>
Net change in cash and cash equivalents and restricted cash and cash equivalents	(39)	1,036
Cash and cash equivalents and restricted cash and cash equivalents at beginning of period	1,445	1,268
Cash and cash equivalents and restricted cash and cash equivalents at end of period	<u>\$ 1,406</u>	<u>\$ 2,304</u>

The accompanying notes are an integral part of these consolidated financial statements.

BERKSHIRE HATHAWAY ENERGY COMPANY AND SUBSIDIARIES
NOTES TO CONSOLIDATED FINANCIAL STATEMENTS
(Unaudited)

(1) General

Berkshire Hathaway Energy Company ("BHE") is a holding company that owns a highly diversified portfolio of locally managed businesses principally engaged in the energy industry (collectively with its subsidiaries, the "Company") and is a consolidated subsidiary of Berkshire Hathaway Inc. ("Berkshire Hathaway").

The Company's operations are organized as eight business segments: PacifiCorp and its subsidiaries ("PacifiCorp"), MidAmerican Funding, LLC and its subsidiaries ("MidAmerican Funding") (which primarily consists of MidAmerican Energy Company ("MidAmerican Energy")), NV Energy, Inc. and its subsidiaries ("NV Energy") (which primarily consists of Nevada Power Company and its subsidiaries ("Nevada Power") and Sierra Pacific Power Company and its subsidiaries ("Sierra Pacific")), Northern Powergrid Holdings Company ("Northern Powergrid") (which primarily consists of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc), BHE Pipeline Group, LLC and its subsidiaries (which primarily consists of BHE GT&S, LLC ("BHE GT&S"), Northern Natural Gas Company ("Northern Natural Gas") and Kern River Gas Transmission Company ("Kern River")), BHE Transmission (which consists of BHE Canada Holdings Corporation ("BHE Canada") (which primarily consists of AltaLink, L.P. ("AltaLink")) and BHE U.S. Transmission, LLC), BHE Renewables (which primarily consists of BHE Renewables, LLC and CalEnergy Philippines) and HomeServices of America, Inc. and its subsidiaries ("HomeServices"). The Company, through these locally managed and operated businesses, owns four utility companies in the United States serving customers in 11 states, two electricity distribution companies in Great Britain, five interstate natural gas pipeline companies and interests in a liquefied natural gas ("LNG") export, import and storage facility in the United States, an electric transmission business in Canada, interests in electric transmission businesses in the United States, a renewable energy business primarily investing in wind, solar, geothermal and hydroelectric projects, the largest residential real estate brokerage firm in the United States and one of the largest residential real estate brokerage franchise networks in the United States.

The unaudited Consolidated Financial Statements have been prepared in accordance with accounting principles generally accepted in the United States of America ("GAAP") for interim financial information and the United States Securities and Exchange Commission's rules and regulations for Form 10-Q and Article 10 of Regulation S-X. Accordingly, they do not include all of the disclosures required by GAAP for annual financial statements. Management believes the unaudited Consolidated Financial Statements contain all adjustments (consisting only of normal recurring adjustments) considered necessary for the fair presentation of the unaudited Consolidated Financial Statements as of March 31, 2021 and for the three-month periods ended March 31, 2021 and 2020. The results of operations for the three-month period ended March 31, 2021 are not necessarily indicative of the results to be expected for the full year.

The preparation of the unaudited Consolidated Financial Statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the unaudited Consolidated Financial Statements and the reported amounts of revenue and expenses during the period. Actual results may differ from the estimates used in preparing the unaudited Consolidated Financial Statements. Note 2 of Notes to Consolidated Financial Statements included in the Company's Annual Report on Form 10-K for the year ended December 31, 2020 describes the most significant accounting policies used in the preparation of the unaudited Consolidated Financial Statements. There have been no significant changes in the Company's assumptions regarding significant accounting estimates and policies during the three-month period ended March 31, 2021.

(2) Business Acquisition

BHE GT&S Acquisition

Transaction Description

On November 1, 2020, BHE completed its acquisition of substantially all of the natural gas transmission and storage business of Dominion Energy, Inc. ("DEI") and Dominion Energy Questar Corporation ("Dominion Questar"), exclusive of Dominion Energy Questar Pipeline, LLC and related entities (the "Questar Pipeline Group") (the "GT&S Transaction"). Under the terms of the Purchase and Sale Agreement, dated July 3, 2020 (the "GT&S Purchase Agreement"), BHE paid approximately \$2.5 billion in cash, after post-closing adjustments (the "GT&S Cash Consideration"), and assumed approximately \$5.6 billion of existing indebtedness for borrowed money, including fair value adjustments, for 100% of the equity interests of Eastern Gas Transmission and Storage, Inc. ("EGTS") (formerly known as Dominion Energy Transmission, Inc.) and Carolina Gas Transmission, LLC (formerly known as Dominion Energy Carolina Gas Transmission, LLC); 50% of the equity interests of Iroquois Gas Transmission System L.P. ("Iroquois"); and a 25% economic interest in Cove Point LNG, LP ("Cove Point") (formerly known as Dominion Energy Cove Point LNG, LP), consisting of 100% of the general partnership interest and 25% of the total limited partnership interests. BHE became the operator of Cove Point after the GT&S Transaction. The GT&S Transaction received clearance under the Hart-Scott-Rodino Antitrust Improvements Act of 1976, as amended ("HSR Approval") in October 2020, and approval by the Department of Energy with respect to a change in control of Cove Point and the Federal Communications Commission with respect to the transfer of certain licenses earlier in 2020.

On October 5, 2020, DEI and Dominion Questar, as permitted under the terms of the GT&S Purchase Agreement, delivered notice to BHE of their election to terminate the GT&S Transaction with respect to the Questar Pipeline Group and, in connection with the execution of the Q-Pipe Purchase Agreement referenced below, to waive the related termination fee under the GT&S Purchase Agreement. Also on October 5, 2020, BHE entered into a second Purchase and Sale Agreement (the "Q-Pipe Purchase Agreement") with Dominion Questar providing for BHE's purchase of the Questar Pipeline Group from Dominion Questar (the "Q-Pipe Transaction") after receipt of HSR Approval, which is currently anticipated in the first half of 2021, for a cash purchase price of approximately \$1.3 billion (the "Q-Pipe Cash Consideration"), subject to adjustment for cash and indebtedness as of the closing, and the assumption of approximately \$430 million of existing indebtedness for borrowed money. DEI is also a party to the Q-Pipe Purchase Agreement, as guarantor for certain provisions regarding the Purchase Price Repayment Amount (as defined below) and other matters.

Under the Q-Pipe Purchase Agreement, BHE delivered the Q-Pipe Cash Consideration of approximately \$1.3 billion, which is included in other current assets on the Consolidated Balance Sheet as of March 31, 2021 and December 31, 2020, to Dominion Questar on November 2, 2020. If the Q-Pipe Transaction does not close, Dominion Questar has agreed to repay all or (depending on the repayment date) substantially all of the Q-Pipe Cash Consideration (the "Purchase Price Repayment Amount") to BHE on or prior to December 31, 2021. If HSR Approval has not been obtained by June 30, 2021, upon BHE's written request, Dominion Questar will seek alternative buyers for all or a material portion of the Questar Pipeline Group (an "Alternative Transaction"). The Purchase Price Repayment Amount may be paid in cash or in shares of common stock, no par value, of DEI, or a combination thereof, subject to certain limitations as to stock repayments set forth in the Q-Pipe Purchase Agreement; provided any payment on or after December 15, 2021 must be paid in cash only.

The assets acquired in the GT&S Transaction include (i) approximately 5,400 miles of operated natural gas transmission, gathering and storage pipelines with approximately 12.5 billion cubic feet ("Bcf") per day of design capacity; (ii) 420 Bcf of operated natural gas storage design capacity, of which 306 Bcf is owned by BHE GT&S; and (iii) an LNG export, import and storage facility with LNG storage capacity of approximately 14.6 billions of cubic feet equivalent.

On October 29, 2020, BHE issued \$3.75 billion of its 4.00% Perpetual Preferred Stock to certain subsidiaries of Berkshire Hathaway Inc. in order to fund the GT&S Cash Consideration and the Q-Pipe Cash Consideration.

Included in BHE's Consolidated Statement of Operations within the BHE Pipeline Group reportable segment for the three-month periods ended March 31, 2021, is operating revenue and net income attributable to BHE shareholders of \$559 million and \$107 million, respectively, as a result of including BHE GT&S from November 1, 2020.

Preliminary Allocation of Purchase Price

BHE GT&S' assets acquired and liabilities assumed were measured at estimated fair value at closing. The majority of BHE GT&S' operations are subject to the rate-setting authority of the Federal Energy Regulatory Commission ("FERC") and are accounted for pursuant to GAAP, including the authoritative guidance for regulated operations. The rate-setting and cost-recovery provisions provide for revenues derived from costs, including a return on investment of assets and liabilities included in rate base. As such, the fair value of BHE GT&S' assets acquired and liabilities assumed subject to these rate-setting provisions are assumed to approximate their carrying values and, therefore, no fair value adjustments have been reflected related to these amounts.

The fair value of BHE GT&S' assets acquired and liabilities assumed not subject to the rate-setting provisions discussed above was determined using an income and cost approach. The income approach is based on significant estimates and assumptions, including Level 3 inputs, which are judgmental in nature. The estimates and assumptions include the projected timing and amount of future cash flows, discount rates reflecting the risk inherent in the future cash flows and future market prices. Additionally, the fair value of long-term debt assumed was determined based on quoted market prices, which is considered a Level 2 fair value measurement.

The fair value of certain contracts and property, plant and equipment related to non-regulated operations, certain regulatory assets and other items included in rate base, an equity method investment and deferred income tax amounts are provisional and are subject to revision for up to 12 months following the acquisition date until the related valuations are completed. These items may be adjusted through regulatory assets or liabilities, to the extent recoverable in rates, or goodwill provided additional information is obtained about the facts and circumstances that existed as of the acquisition date. Such information includes, but is not limited to, the receipt of further information regarding the fair value of the contracts and property, plant and equipment related to non-regulated operations, the equity method investment and any associated deferred income tax amounts as well as the evolution of the rate-making process for regulated operations.

The following table summarizes the preliminary fair values of the assets acquired and liabilities assumed as of the acquisition date (in millions):

	<u>Fair Value</u>
Current assets, including cash and cash equivalents of \$104	\$ 569
Property, plant and equipment	9,254
Goodwill	1,732
Regulatory assets	108
Deferred income taxes	275
Other long-term assets	1,424
Total assets	<u>13,362</u>
Current liabilities, including current portion of long-term debt of \$1,200	1,567
Long-term debt, less current portion	4,415
Regulatory liabilities	661
Other long-term liabilities	289
Total liabilities	<u>6,932</u>
Noncontrolling interest	3,916
Net assets acquired	<u><u>\$ 2,514</u></u>

Goodwill

The excess of the purchase price paid over the estimated fair values of the identifiable assets acquired and liabilities assumed totaled \$1.7 billion and is reflected as goodwill in the BHE Pipeline Group reportable segment. The goodwill reflects the value paid primarily for the long-term opportunity to improve operating results through the efficient management of operating expenses and the deployment of capital. Goodwill is not amortized, but rather is reviewed annually for impairment or more frequently if indicators of impairment exist. For income tax purposes, the GT&S Acquisition is treated as a deemed asset acquisition resulting from tax elections being made, therefore all tax goodwill is deductible. Due to book and tax basis differences of certain items, book and tax goodwill will differ. The amount of tax goodwill is approximately \$0.9 billion and will be amortized over 15 years.

Pro Forma Financial Information

The following unaudited pro forma financial information reflects the consolidated results of operations of BHE and the amortization of the purchase price adjustments assuming the acquisition had taken place on January 1, 2019, excluding non-recurring transaction costs incurred by BHE during 2020 (in millions):

	Three-Month Period Ended March 31, 2020
Operating revenue	\$ 5,056
Net income attributable to BHE shareholders	\$ 773

(3) Property, Plant and Equipment, Net

Property, plant and equipment, net consists of the following (in millions):

	Depreciable Life	As of	
		March 31, 2021	December 31, 2020
Regulated assets:			
Utility generation, transmission and distribution systems	5-80 years	\$ 87,898	\$ 86,730
Interstate natural gas pipeline assets	3-80 years	16,712	16,667
		104,610	103,397
Accumulated depreciation and amortization		(31,653)	(30,662)
Regulated assets, net		72,957	72,735
Nonregulated assets:			
Independent power plants	5-30 years	7,034	7,012
Other assets	3-40 years	5,794	5,659
		12,828	12,671
Accumulated depreciation and amortization		(2,337)	(2,586)
Nonregulated assets, net		10,491	10,085
Net operating assets		83,448	82,820
Construction work-in-progress		3,309	3,308
Property, plant and equipment, net		\$ 86,757	\$ 86,128

Construction work-in-progress includes \$2.9 billion as of March 31, 2021 and \$3.2 billion as of December 31, 2020, related to the construction of regulated assets.

(4) Investments and Restricted Cash and Cash Equivalents and Investments

Investments and restricted cash and cash equivalents and investments consists of the following (in millions):

	As of	
	March 31, 2021	December 31, 2020
Investments:		
BYD Company Limited common stock	\$ 4,773	\$ 5,897
Rabbi trusts	452	440
Other	288	263
Total investments	5,513	6,600
Equity method investments:		
BHE Renewables tax equity investments	5,399	5,626
Iroquois Gas Transmission System, L.P.	586	580
Electric Transmission Texas, LLC	581	594
JAX LNG, LLC	80	75
Bridger Coal Company	68	74
Other	113	118
Total equity method investments	6,827	7,067
Restricted cash and cash equivalents and investments:		
Quad Cities Station nuclear decommissioning trust funds	697	676
Other restricted cash and cash equivalents	130	155
Total restricted cash and cash equivalents and investments	827	831
Total investments and restricted cash and cash equivalents and investments	\$ 13,167	\$ 14,498
Reflected as:		
Current assets	\$ 157	\$ 178
Noncurrent assets	13,010	14,320
Total investments and restricted cash and cash equivalents and investments	\$ 13,167	\$ 14,498

Investments

(Losses) gains on marketable securities, net recognized during the period consists of the following (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Unrealized (losses) gains recognized on marketable securities still held at the reporting date	\$ (1,119)	\$ 25
Net gains recognized on marketable securities sold during the period	1	2
(Losses) gains on marketable securities, net	\$ (1,118)	\$ 27

Equity Method Investments

The Company has invested in projects sponsored by third parties, commonly referred to as tax equity investments. Once a project achieves commercial operation, the Company enters into a partnership agreement with the project sponsor that directs and allocates the operating profits and tax benefits from the project. Certain of the Company's tax equity investments are located in Texas and have physical settlement hedge obligations that were negatively impacted due to production shortfalls during periods of extreme market pricing volatility as a result of the February 2021 polar vortex weather event. The Company recognized pre-tax equity losses of \$218 million, or after-tax losses of \$23 million inclusive of production tax credits ("PTCs") of \$148 million and other income tax benefits of \$47 million, during the three-month period ended March 31, 2021, on its tax equity investments, largely due to the February 2021 polar vortex weather event. The losses for the impacted tax equity investments were based upon the terms of each partnership agreement, as amended, and are subject to change as project-by-project discussions are ongoing among the Company and the respective hedge provider and project sponsor. As of March 31, 2021, the carrying value of the impacted tax equity investments totaled \$2.8 billion.

Cash and Cash Equivalents and Restricted Cash and Cash Equivalents

Cash equivalents consist of funds invested in money market mutual funds, United States Treasury Bills and other investments with a maturity of three months or less when purchased. Cash and cash equivalents exclude amounts where availability is restricted by legal requirements, loan agreements or other contractual provisions. Restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, consist substantially of funds restricted for the purpose of constructing solid waste facilities under tax-exempt bond obligation agreements and debt service obligations for certain of the Company's nonregulated renewable energy projects. A reconciliation of cash and cash equivalents and restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, as presented in the Consolidated Statements of Cash Flows is outlined below and disaggregated by the line items in which they appear on the Consolidated Balance Sheets (in millions):

	As of	
	March 31, 2021	December 31, 2020
Cash and cash equivalents	\$ 1,276	\$ 1,290
Restricted cash and cash equivalents	117	140
Investments and restricted cash and cash equivalents and investments	13	15
Total cash and cash equivalents and restricted cash and cash equivalents	<u>\$ 1,406</u>	<u>\$ 1,445</u>

(5) Recent Financing Transactions

Long-Term Debt

In April 2021, Northern Natural Gas issued \$550 million of 3.40% Senior Bonds due October 2051. Northern Natural Gas used the net proceeds to early redeem in April 2021 all of its \$200 million, 4.25% Senior Notes originally due June 2021 and for general corporate purposes.

Credit Facilities

In April 2021, AltaLink Investments, L.P. extended, with lender consent, the expiration date for its existing C\$200 million one-year revolving credit facility to April 2022, by exercising a one-year extension option.

(6) Income Taxes

The effective income tax rate for the three-month period ended March 31, 2021, is 217% and results from a \$535 million income tax benefit associated with a \$246 million pre-tax loss, primarily relating to a pre-tax unrealized loss of \$1,124 million on the Company's investment in BYD Company Limited. The \$535 million income tax benefit is primarily comprised of a \$52 million benefit (21%) from the application of the statutory income tax rate to the pre-tax loss, a \$334 million benefit (136%) from income tax credits and a \$51 million benefit (21%) from state income tax benefits, net of federal income tax impacts.

A reconciliation of the federal statutory income tax rate to the effective income tax rate applicable to income before income tax benefit is as follows:

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Federal statutory income tax rate	21 %	21 %
Income tax credits	136	(46)
State income tax, net of federal income tax impacts	21	—
Income tax effect of foreign income	6	(3)
Effects of ratemaking	10	(8)
Equity income	15	(1)
Noncontrolling interest	9	—
Other, net	(1)	1
Effective income tax rate	<u>217 %</u>	<u>(36)%</u>

Income tax credits relate primarily to PTCs from wind-powered generating facilities owned by MidAmerican Energy, PacifiCorp and BHE Renewables. Federal renewable electricity PTCs are earned as energy from qualifying wind-powered generating facilities is produced and sold and are based on a per-kilowatt hour rate pursuant to the applicable federal income tax law. Wind-powered generating facilities are eligible for the credits for 10 years from the date the qualifying generating facilities are placed in-service. PTCs for the three-month periods ended March 31, 2021 and 2020 totaled \$315 million and \$233 million, respectively.

The Company's provision for income taxes has been computed on a stand-alone basis. Berkshire Hathaway includes the Company in its consolidated United States federal and Iowa state income tax returns and the majority of the Company's United States federal income tax is remitted to or received from Berkshire Hathaway. The Company made no payments for federal income taxes to Berkshire Hathaway for the three-month period ended March 31, 2021, and made payments for federal income taxes to Berkshire Hathaway totaling \$100 million for the three-month period ended March 31, 2020.

(7) Employee Benefit Plans

Domestic Operations

Net periodic benefit cost (credit) for the domestic pension and other postretirement benefit plans included the following components (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Pension:		
Service cost	\$ 7	\$ 3
Interest cost	20	23
Expected return on plan assets	(33)	(35)
Net amortization	6	9
Net periodic benefit cost	<u>\$ —</u>	<u>\$ —</u>
Other postretirement:		
Service cost	\$ 2	\$ 1
Interest cost	5	6
Expected return on plan assets	(5)	(9)
Net amortization	(1)	(1)
Net periodic benefit cost (credit)	<u>\$ 1</u>	<u>\$ (3)</u>

Amounts other than the service cost for pension and other postretirement benefit plans are recorded in Other, net in the Consolidated Statements of Operations. Employer contributions to the domestic pension and other postretirement benefit plans are expected to be \$13 million and \$13 million, respectively, during 2021. As of March 31, 2021, \$3 million and \$3 million of contributions had been made to the domestic pension and other postretirement benefit plans, respectively.

Foreign Operations

Net periodic benefit credit for the United Kingdom pension plan included the following components (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Service cost	\$ 4	\$ 4
Interest cost	8	10
Expected return on plan assets	(28)	(25)
Net amortization	14	10
Net periodic benefit credit	<u>\$ (2)</u>	<u>\$ (1)</u>

Amounts other than the service cost for the United Kingdom pension plan are recorded in Other, net in the Consolidated Statements of Operations. Employer contributions to the United Kingdom pension plan are expected to be £50 million during 2021. As of March 31, 2021, £11 million, or \$15 million, of contributions had been made to the United Kingdom pension plan.

(8) Fair Value Measurements

The carrying value of the Company's cash, certain cash equivalents, receivables, payables, accrued liabilities and short-term borrowings approximates fair value because of the short-term maturity of these instruments. The Company has various financial assets and liabilities that are measured at fair value on the Consolidated Financial Statements using inputs from the three levels of the fair value hierarchy. A financial asset or liability classification within the hierarchy is determined based on the lowest level input that is significant to the fair value measurement. The three levels are as follows:

- Level 1 — Inputs are unadjusted quoted prices in active markets for identical assets or liabilities that the Company has the ability to access at the measurement date.
- Level 2 — Inputs include quoted prices for similar assets or liabilities in active markets, quoted prices for identical or similar assets or liabilities in markets that are not active, inputs other than quoted prices that are observable for the asset or liability and inputs that are derived principally from or corroborated by observable market data by correlation or other means (market corroborated inputs).
- Level 3 — Unobservable inputs reflect the Company's judgments about the assumptions market participants would use in pricing the asset or liability since limited market data exists. The Company develops these inputs based on the best information available, including its own data.

The following table presents the Company's financial assets and liabilities recognized on the Consolidated Balance Sheets and measured at fair value on a recurring basis (in millions):

	Input Levels for Fair Value Measurements					
	Level 1	Level 2	Level 3	Other ⁽¹⁾	Total	
As of March 31, 2021						
Assets:						
Commodity derivatives	\$ 1	\$ 72	\$ 154	\$ (18)	\$ 209	
Foreign currency exchange rate derivatives	—	12	—	—	12	
Interest rate derivatives	—	33	47	—	80	
Mortgage loans held for sale	—	2,065	—	—	2,065	
Money market mutual funds ⁽²⁾	807	—	—	—	807	
Debt securities:						
United States government obligations	210	—	—	—	210	
International government obligations	—	5	—	—	5	
Corporate obligations	—	71	—	—	71	
Municipal obligations	—	2	—	—	2	
Agency, asset and mortgage-backed obligations	—	5	—	—	5	
Equity securities:						
United States companies	395	—	—	—	395	
International companies	4,780	—	—	—	4,780	
Investment funds	256	—	—	—	256	
	<u>\$ 6,449</u>	<u>\$ 2,265</u>	<u>\$ 201</u>	<u>\$ (18)</u>	<u>\$ 8,897</u>	
Liabilities:						
Commodity derivatives	\$ —	\$ (90)	\$ (30)	\$ 39	\$ (81)	
Foreign currency exchange rate derivatives	—	(1)	—	—	(1)	
Interest rate derivatives	(3)	(14)	(6)	—	(23)	
	<u>\$ (3)</u>	<u>\$ (105)</u>	<u>\$ (36)</u>	<u>\$ 39</u>	<u>\$ (105)</u>	

	Input Levels for Fair Value Measurements				
	Level 1	Level 2	Level 3	Other ⁽¹⁾	Total
As of December 31, 2020					
Assets:					
Commodity derivatives	\$ 1	\$ 73	\$ 135	\$ (21)	\$ 188
Foreign currency exchange rate derivatives	—	20	—	—	20
Interest rate derivatives	—	—	62	—	62
Mortgage loans held for sale	—	2,001	—	—	2,001
Money market mutual funds ⁽²⁾	873	—	—	—	873
Debt securities:					
United States government obligations	200	—	—	—	200
International government obligations	—	5	—	—	5
Corporate obligations	—	73	—	—	73
Municipal obligations	—	2	—	—	2
Agency, asset and mortgage-backed obligations	—	6	—	—	6
Equity securities:					
United States companies	381	—	—	—	381
International companies	5,906	—	—	—	5,906
Investment funds	201	—	—	—	201
	\$ 7,562	\$ 2,180	\$ 197	\$ (21)	\$ 9,918
Liabilities:					
Commodity derivatives	\$ (1)	\$ (90)	\$ (19)	\$ 56	\$ (54)
Foreign currency exchange rate derivatives	—	(2)	—	—	(2)
Interest rate derivatives	(5)	(60)	—	—	(65)
	\$ (6)	\$ (152)	\$ (19)	\$ 56	\$ (121)

(1) Represents netting under master netting arrangements and a net cash collateral receivable of \$21 million and \$35 million as of March 31, 2021 and December 31, 2020, respectively.

(2) Amounts are included in cash and cash equivalents; other current assets; and noncurrent investments and restricted cash and investments on the Consolidated Balance Sheets. The fair value of these money market mutual funds approximates cost.

Derivative contracts are recorded on the Consolidated Balance Sheets as either assets or liabilities and are stated at estimated fair value unless they are designated as normal purchases or normal sales and qualify for the exception afforded by GAAP. When available, the fair value of derivative contracts is estimated using unadjusted quoted prices for identical contracts in the market in which the Company transacts. When quoted prices for identical contracts are not available, the Company uses forward price curves. Forward price curves represent the Company's estimates of the prices at which a buyer or seller could contract today for delivery or settlement at future dates. The Company bases its forward price curves upon market price quotations, when available, or internally developed and commercial models, with internal and external fundamental data inputs. Market price quotations are obtained from independent brokers, exchanges, direct communication with market participants and actual transactions executed by the Company. Market price quotations are generally readily obtainable for the applicable term of the Company's outstanding derivative contracts; therefore, the Company's forward price curves reflect observable market quotes. Market price quotations for certain electricity and natural gas trading hubs are not as readily obtainable due to the length of the contract. Given that limited market data exists for these contracts, as well as for those contracts that are not actively traded, the Company uses forward price curves derived from internal models based on perceived pricing relationships to major trading hubs that are based on unobservable inputs. The estimated fair value of these derivative contracts is a function of underlying forward commodity prices, interest rates, currency rates, related volatility, counterparty creditworthiness and duration of contracts.

The Company's mortgage loans held for sale are valued based on independent quoted market prices, where available, or the prices of other mortgage whole loans with similar characteristics. As necessary, these prices are adjusted for typical securitization activities, including servicing value, portfolio composition, market conditions and liquidity.

The Company's investments in money market mutual funds and debt and equity securities are stated at fair value. When available, a readily observable quoted market price or net asset value of an identical security in an active market is used to record the fair value. In the absence of a quoted market price or net asset value of an identical security, the fair value is determined using pricing models or net asset values based on observable market inputs and quoted market prices of securities with similar characteristics.

The following table reconciles the beginning and ending balances of the Company's assets and liabilities measured at fair value on a recurring basis using significant Level 3 inputs (in millions):

	Three-Month Periods Ended March 31,	
	Commodity Derivatives	Interest Rate Derivatives
2021:		
Beginning balance	\$ 116	\$ 62
Changes included in earnings ⁽¹⁾	(6)	(21)
Changes in fair value recognized in OCI	(1)	—
Changes in fair value recognized in net regulatory assets	16	—
Settlements	(1)	—
Ending balance	<u>\$ 124</u>	<u>\$ 41</u>
2020:		
Beginning balance	\$ 97	\$ 14
Changes included in earnings ⁽¹⁾	(3)	31
Changes in fair value recognized in net regulatory assets	(40)	—
Purchases	2	—
Settlements	(4)	—
Ending balance	<u>\$ 52</u>	<u>\$ 45</u>

(1) Changes included in earnings for interest rate derivatives are reported net of amounts related to the satisfaction of the associated loan commitment.

The Company's long-term debt is carried at cost, including fair value adjustments and unamortized premiums, discounts and debt issuance costs as applicable, on the Consolidated Balance Sheets. The fair value of the Company's long-term debt is a Level 2 fair value measurement and has been estimated based upon quoted market prices, where available, or at the present value of future cash flows discounted at rates consistent with comparable maturities with similar credit risks. The carrying value of the Company's variable-rate long-term debt approximates fair value because of the frequent repricing of these instruments at market rates. The following table presents the carrying value and estimated fair value of the Company's long-term debt (in millions):

	As of March 31, 2021		As of December 31, 2020	
	Carrying Value	Fair Value	Carrying Value	Fair Value
Long-term debt	<u>\$ 49,461</u>	<u>\$ 55,926</u>	<u>\$ 49,866</u>	<u>\$ 60,633</u>

(9) Commitments and Contingencies

Legal Matters

The Company is party to a variety of legal actions arising out of the normal course of business. Plaintiffs occasionally seek punitive or exemplary damages. The Company does not believe that such normal and routine litigation will have a material impact on its consolidated financial results. The Company is also involved in other kinds of legal actions, some of which assert or may assert claims or seek to impose fines, penalties and other costs in substantial amounts and are described below.

California and Oregon 2020 Wildfires

In September 2020, a severe weather event resulting in high winds, low humidity and warm temperatures contributed to several major wildfires, private and public property damage, personal injuries and loss of life and widespread power outages in Oregon and Northern California. The wildfires spread across certain parts of PacifiCorp's service territory and surrounding areas across multiple counties in Oregon and California, including Siskiyou County, California; Jackson County, Oregon; Douglas County, Oregon; Marion County, Oregon; Lincoln County, Oregon; and Klamath County, Oregon burning over 500,000 acres in aggregate. Third party reports for these wildfires indicate over 2,000 structures, including residences, destroyed; several structures damaged; multiple individuals injured; and several fatalities. Fire suppression costs estimated by various agencies total approximately \$150 million. Investigations into the cause and origin of each wildfire are complex and ongoing and being conducted by various entities, including the United States Forest Service, the California Public Utilities Commission, the Oregon Department of Forestry, the Oregon Department of Justice, PacifiCorp and various experts engaged by PacifiCorp.

Several lawsuits have been filed in Oregon and California, including a putative class action complaint in Oregon, on behalf of citizens and businesses who suffered damages from fires allegedly caused by PacifiCorp. The final determinations of liability, however, will only be made following comprehensive investigations and litigation processes.

In California, under inverse condemnation, courts have held that investor-owned utilities can be liable for real and personal property damages without the utility being found negligent and regardless of fault. California law also permits inverse condemnation plaintiffs to recover reasonable attorney fees and costs. In both Oregon and California, PacifiCorp has equipment in areas accessed through special use permits, easements or similar agreements that may contain provisions requiring it to pay for damages caused by its equipment regardless of fault. Even if inverse condemnation or other provisions do not apply, PacifiCorp could nevertheless be found liable for all damages proximately caused by negligence, including property and natural resource damage; fire suppression costs; personal injury and loss of life damages; and interest.

As of March 31, 2021, PacifiCorp has accrued \$136 million as its best estimate of the potential losses net of expected insurance recoveries associated with the 2020 Wildfires that are considered probable of being incurred. These accruals include estimated losses for fire suppression costs, property damage, personal injury damages and loss of life damages. It is reasonably possible that PacifiCorp will incur additional losses beyond the amounts accrued; however, PacifiCorp is currently unable to estimate the range of possible additional losses that could be incurred due to the number of properties and parties involved and the lack of specific claims for all potential claimants. To the extent losses beyond the amounts accrued are incurred, additional insurance coverage is expected to be available to cover at least a portion of the losses.

Environmental Laws and Regulations

The Company is subject to federal, state, local and foreign laws and regulations regarding climate change, renewable portfolio standards, air and water quality, emissions performance standards, coal combustion byproduct disposal, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact the Company's current and future operations. The Company believes it is in material compliance with all applicable laws and regulations.

Hydroelectric Relicensing

PacifiCorp is a party to the 2016 amended Klamath Hydroelectric Settlement Agreement ("KHSA"), which is intended to resolve disputes surrounding PacifiCorp's efforts to relicense the Klamath Hydroelectric Project. The KHSA establishes a process for PacifiCorp, the states of Oregon and California ("States") and other stakeholders to assess whether dam removal can occur consistent with the settlement's terms. For PacifiCorp, the key elements of the settlement include: (1) a contribution from PacifiCorp's Oregon and California customers capped at \$200 million plus \$250 million in California bond funds; (2) complete indemnification from harms associated with dam removal; (3) transfer of the FERC license to a third-party dam removal entity, the Klamath River Renewal Corporation ("KRRC"), who would conduct dam removal; and (4) ability for PacifiCorp to operate the facilities for the benefit of customers until dam removal commences.

In September 2016, the KRRC and PacifiCorp filed a joint application with the FERC to transfer the license for the four mainstem Klamath dams from PacifiCorp to the KRRC. The FERC approved partial transfer of the Klamath license in a July 2020 order, subject to the condition that PacifiCorp remains co-licensee. Under the amended KHSA, PacifiCorp did not agree to remain co-licensee during the surrender and removal process given concerns about liability protections for PacifiCorp and its customers. In November 2020, PacifiCorp entered a memorandum of agreement (the "MOA") with the KRRC, the Karuk Tribe, the Yurok Tribe and the States to continue implementation of the KHSA. The agreement required the States, PacifiCorp and KRRC to file a new license transfer application by January 16, 2021 to remove PacifiCorp from the license for the Klamath Hydroelectric Project and add the States and KRRC as co-licensees for the purposes of surrender. On January 13, 2021, the new license transfer application was filed with the FERC, notifying it that PacifiCorp and the KRRC are not accepting co-licensee status under FERC's July 2020 order, and instead are seeking the license transfer outcome described in the new license transfer application. In addition, the MOA provides for additional contingency funding of \$45 million, equally split between PacifiCorp and the States, and for PacifiCorp and the States to equally share in any additional cost overruns in the unlikely event that dam removal costs exceed the \$450 million in funding to ensure dam removal is complete. The MOA also requires PacifiCorp to cover the costs associated with certain pre-existing environmental conditions.

Guarantees

The Company has entered into guarantees as part of the normal course of business and the sale of certain assets. These guarantees are not expected to have a material impact on the Company's consolidated financial results.

(10) Revenue from Contracts with Customers

Energy Products and Services

The following table summarizes the Company's energy products and services revenue from contracts with customers ("Customer Revenue") by regulated energy and nonregulated energy, with further disaggregation of regulated energy by line of business, including a reconciliation to the Company's reportable segment information included in Note 13 (in millions):

For the Three-Month Period Ended March 31, 2021									
	PacifiCorp	MidAmerican Funding	NV Energy	Northern Powergrid	BHE Pipeline Group	BHE Transmission	BHE Renewables	BHE and Other ⁽¹⁾	Total
Customer Revenue:									
Regulated:									
Retail electric	\$ 1,145	\$ 452	\$ 511	\$ —	\$ —	\$ —	\$ —	\$ —	\$ 2,108
Retail gas	—	460	38	—	—	—	—	—	498
Wholesale	36	125	15	—	17	—	—	—	193
Transmission and distribution	25	15	21	263	—	172	—	—	496
Interstate pipeline	—	—	—	—	815	—	—	(41)	774
Other	23	—	—	—	2	—	—	—	25
Total Regulated	1,229	1,052	585	263	834	172	—	(41)	4,094
Nonregulated	—	10	—	10	237	8	166	187	618
Total Customer Revenue	1,229	1,062	585	273	1,071	180	166	146	4,712
Other revenue	13	5	6	27	22	—	24	40	137
Total	\$ 1,242	\$ 1,067	\$ 591	\$ 300	\$ 1,093	\$ 180	\$ 190	\$ 186	\$ 4,849

For the Three-Month Period Ended March 31, 2020									
	PacifiCorp	MidAmerican Funding	NV Energy	Northern Powergrid	BHE Pipeline Group	BHE Transmission	BHE Renewables	BHE and Other ⁽¹⁾	Total
Customer Revenue:									
Regulated:									
Retail electric	\$ 1,122	\$ 410	\$ 529	\$ —	\$ —	\$ —	\$ —	\$ —	\$ 2,061
Retail gas	—	187	47	—	—	—	—	—	234
Wholesale	—	64	14	—	—	—	—	(1)	77
Transmission and distribution	22	15	23	233	—	169	—	—	462
Interstate pipeline	—	—	—	—	400	—	—	(48)	352
Other	26	—	1	—	—	—	—	—	27
Total Regulated	1,170	676	614	233	400	169	—	(49)	3,213
Nonregulated	—	6	1	7	—	3	159	127	303
Total Customer Revenue	1,170	682	615	240	400	172	159	78	3,516
Other revenue	36	4	7	26	1	—	19	25	118
Total	\$ 1,206	\$ 686	\$ 622	\$ 266	\$ 401	\$ 172	\$ 178	\$ 103	\$ 3,634

(1) The BHE and Other reportable segment represents amounts related principally to other entities, corporate functions and intersegment eliminations.

Real Estate Services

The following table summarizes the Company's real estate services Customer Revenue by line of business (in millions):

	HomeServices	
	Three-Month Periods	
	Ended March 31,	
	2021	2020
Customer Revenue:		
Brokerage	\$ 1,022	\$ 777
Franchise	18	16
Total Customer Revenue	1,040	793
Mortgage and other revenue	192	100
Total	<u>\$ 1,232</u>	<u>\$ 893</u>

Remaining Performance Obligations

The following table summarizes the Company's revenue it expects to recognize in future periods related to significant unsatisfied remaining performance obligations for fixed contracts with expected durations in excess of one year as of March 31, 2021, by reportable segment (in millions):

	Performance obligations expected to be satisfied:		
	Less than 12 months	More than 12 months	Total
BHE Pipeline Group	\$ 2,521	\$ 20,918	\$ 23,439
BHE Transmission	513	—	513
Total	<u>\$ 3,034</u>	<u>\$ 20,918</u>	<u>\$ 23,952</u>

(11) BHE Shareholders' Equity

For the three-month period ended March 31, 2020, BHE repurchased 180,358 shares of its common stock for \$126 million.

(12) Components of Other Comprehensive Income (Loss), Net

The following table shows the change in accumulated other comprehensive income (loss) attributable to BHE shareholders by each component of other comprehensive income (loss), net of applicable income tax (in millions):

	Unrecognized Amounts on Retirement Benefits	Foreign Currency Translation Adjustment	Unrealized (Losses) Gains on Cash Flow Hedges	AOCI Attributable To BHE Shareholders, Net
Balance, December 31, 2019	\$ (417)	\$ (1,296)	\$ 7	\$ (1,706)
Other comprehensive income (loss)	34	(548)	(33)	(547)
Balance, March 31, 2020	<u>\$ (383)</u>	<u>\$ (1,844)</u>	<u>\$ (26)</u>	<u>\$ (2,253)</u>
Balance, December 31, 2020	\$ (482)	\$ (1,062)	\$ (8)	\$ (1,552)
Other comprehensive income	7	91	14	112
Balance, March 31, 2021	<u>\$ (475)</u>	<u>\$ (971)</u>	<u>\$ 6</u>	<u>\$ (1,440)</u>

(13) Segment Information

The Company's reportable segments with foreign operations include Northern Powergrid, whose business is principally in the United Kingdom, BHE Transmission, whose business includes operations in Canada, and BHE Renewables, whose business includes operations in the Philippines. Intersegment eliminations and adjustments, including the allocation of goodwill, have been made. Information related to the Company's reportable segments is shown below (in millions):

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Operating revenue:		
PacifiCorp	\$ 1,242	\$ 1,206
MidAmerican Funding	1,067	686
NV Energy	591	622
Northern Powergrid	300	266
BHE Pipeline Group	1,093	401
BHE Transmission	180	172
BHE Renewables	190	178
HomeServices	1,232	893
BHE and Other ⁽¹⁾	186	103
Total operating revenue	<u>\$ 6,081</u>	<u>\$ 4,527</u>
Depreciation and amortization:		
PacifiCorp	\$ 264	\$ 252
MidAmerican Funding	207	176
NV Energy	136	124
Northern Powergrid	71	63
BHE Pipeline Group	118	64
BHE Transmission	58	60
BHE Renewables	60	71
HomeServices	11	11
BHE and Other ⁽¹⁾	2	—
Total depreciation and amortization	<u>\$ 927</u>	<u>\$ 821</u>

	Three-Month Periods Ended March 31,	
	2021	2020
Operating income:		
PacifiCorp	\$ 234	\$ 234
MidAmerican Funding	48	102
NV Energy	70	79
Northern Powergrid	151	132
BHE Pipeline Group	618	249
BHE Transmission	81	76
BHE Renewables	33	17
HomeServices	112	20
BHE and Other ⁽¹⁾	(14)	10
Total operating income	1,333	919
Interest expense	(530)	(483)
Capitalized interest	14	17
Allowance for equity funds	26	34
Interest and dividend income	21	20
(Losses) gains on marketable securities, net	(1,118)	27
Other, net	8	(27)
Total (loss) income before income tax benefit and equity loss	<u>\$ (246)</u>	<u>\$ 507</u>
Interest expense:		
PacifiCorp	\$ 107	\$ 102
MidAmerican Funding	78	81
NV Energy	52	58
Northern Powergrid	33	32
BHE Pipeline Group	38	14
BHE Transmission	38	38
BHE Renewables	40	42
HomeServices	1	5
BHE and Other ⁽¹⁾	143	111
Total interest expense	<u>\$ 530</u>	<u>\$ 483</u>
(Loss) earnings on common shares:		
PacifiCorp	\$ 169	\$ 176
MidAmerican Funding	144	150
NV Energy	34	20
Northern Powergrid	104	87
BHE Pipeline Group	383	179
BHE Transmission	59	55
BHE Renewables	16	95
HomeServices	84	10
BHE and Other	(1,027)	(102)
(Loss) earnings on common shares	<u>\$ (34)</u>	<u>\$ 670</u>

	As of	
	March 31, 2021	December 31, 2020
Assets:		
PacifiCorp	\$ 26,956	\$ 26,862
MidAmerican Funding	24,098	23,530
NV Energy	14,594	14,501
Northern Powergrid	8,980	8,782
BHE Pipeline Group	19,651	19,541
BHE Transmission	9,341	9,208
BHE Renewables	11,935	12,004
HomeServices	5,186	4,955
BHE and Other ⁽¹⁾	6,781	7,933
Total assets	<u>\$ 127,522</u>	<u>\$ 127,316</u>

(1) The differences between the reportable segment amounts and the consolidated amounts, described as BHE and Other, relate principally to other entities, including MidAmerican Energy Services, LLC, corporate functions and intersegment eliminations.

	Three-Month Periods Ended March 31,	
	2021	2020
Operating revenue by country:		
United States	\$ 5,597	\$ 4,089
United Kingdom	300	266
Canada	177	171
Philippines and other	7	1
Total operating revenue by country	<u>\$ 6,081</u>	<u>\$ 4,527</u>
(Loss) income before income tax benefit and equity loss by country:		
United States	\$ (423)	\$ 354
United Kingdom	132	109
Canada	39	40
Philippines and other	6	4
Total (loss) income before income tax benefit and equity loss by country	<u>\$ (246)</u>	<u>\$ 507</u>

The following table shows the change in the carrying amount of goodwill by reportable segment for the three-month period ended March 31, 2021 (in millions):

	PacifiCorp	MidAmerican Funding	NV Energy	Northern Powergrid	BHE Pipeline Group	BHE Transmission	BHE Renewables	HomeServices	Total
December 31, 2020	\$ 1,129	\$ 2,102	\$ 2,369	\$ 1,000	\$ 1,803	\$ 1,551	\$ 95	\$ 1,457	\$ 11,506
Acquisitions	—	—	—	—	—	—	—	1	1
Foreign currency translation	—	—	—	6	—	21	—	—	27
March 31, 2021	<u>\$ 1,129</u>	<u>\$ 2,102</u>	<u>\$ 2,369</u>	<u>\$ 1,006</u>	<u>\$ 1,803</u>	<u>\$ 1,572</u>	<u>\$ 95</u>	<u>\$ 1,458</u>	<u>\$ 11,534</u>

Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations

The following is management's discussion and analysis of certain significant factors that have affected the consolidated financial condition and results of operations of the Company during the periods included herein. Explanations include management's best estimate of the impact of weather, customer growth, usage trends and other factors. This discussion should be read in conjunction with the Company's historical unaudited Consolidated Financial Statements and Notes to Consolidated Financial Statements in Part I, Item 1 of this Form 10-Q. The Company's actual results in the future could differ significantly from the historical results.

Berkshire Hathaway Energy's operations are organized as eight business segments: PacifiCorp, MidAmerican Funding (which primarily consists of MidAmerican Energy), NV Energy (which primarily consists of Nevada Power and Sierra Pacific), Northern Powergrid (which primarily consists of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc), BHE Pipeline Group (which primarily consists of BHE GT&S, Northern Natural Gas and Kern River), BHE Transmission (which consists of BHE Canada (which primarily consists of AltaLink) and BHE U.S. Transmission), BHE Renewables and HomeServices. BHE, through these locally managed and operated businesses, owns four utility companies in the United States serving customers in 11 states, two electricity distribution companies in Great Britain, five interstate natural gas pipeline companies, one of which owns an LNG import, export and storage facility, in the United States, an electric transmission business in Canada, interests in electric transmission businesses in the United States, a renewable energy business primarily investing in wind, solar, geothermal and hydroelectric projects, the largest residential real estate brokerage firm in the United States and one of the largest residential real estate brokerage franchise networks in the United States. The reportable segment financial information includes all necessary adjustments and eliminations needed to conform to the Company's significant accounting policies. The differences between the reportable segment amounts and the consolidated amounts, described as BHE and Other, relate principally to other entities, corporate functions and intersegment eliminations.

Results of Operations for the First Quarter of 2021 and 2020

Overview

Operating revenue and earnings on common shares for the Company's reportable segments are summarized as follows (in millions):

	First Quarter			
	2021	2020	Change	
Operating revenue:				
PacifiCorp	\$ 1,242	\$ 1,206	\$ 36	3 %
MidAmerican Funding	1,067	686	381	56
NV Energy	591	622	(31)	(5)
Northern Powergrid	300	266	34	13
BHE Pipeline Group	1,093	401	692	*
BHE Transmission	180	172	8	5
BHE Renewables	190	178	12	7
HomeServices	1,232	893	339	38
BHE and Other	186	103	83	81
Total operating revenue	<u>\$ 6,081</u>	<u>\$ 4,527</u>	<u>\$ 1,554</u>	34 %
(Loss) earnings on common shares:				
PacifiCorp	\$ 169	\$ 176	\$ (7)	(4)%
MidAmerican Funding	144	150	(6)	(4)
NV Energy	34	20	14	70
Northern Powergrid	104	87	17	20
BHE Pipeline Group	383	179	204	*
BHE Transmission	59	55	4	7
BHE Renewables ⁽¹⁾	16	95	(79)	(83)
HomeServices	84	10	74	*
BHE and Other	(1,027)	(102)	(925)	*
(Loss) earnings on common shares	<u>\$ (34)</u>	<u>\$ 670</u>	<u>\$ (704)</u>	*

(1) Includes the tax attributes of disregarded entities that are not required to pay income taxes and the earnings of which are taxable directly to BHE.

* Not meaningful

Earnings on common shares decreased \$704 million for the first quarter of 2021 compared to 2020. The first quarter of 2021 included a pre-tax unrealized loss of \$1,124 million (\$818 million after-tax) compared to a pre-tax unrealized gain in the first quarter of 2020 of \$54 million (\$39 million after-tax) on the Company's investment in BYD Company Limited. Excluding the impact of this item, adjusted earnings on common shares for the first quarter of 2021 was \$784 million, an increase of \$153 million, or 24%, compared to adjusted earnings on common shares in the first quarter of 2020 of \$631 million.

The decrease in earnings on common shares for the first quarter of 2021 compared to 2020 was primarily due to the following:

- \$204 million higher net income at BHE Pipeline Group, primarily due to \$107 million of incremental net income from BHE GT&S, acquired in November 2020, higher gross margin on gas sales and higher transportation revenue at Northern Natural Gas, largely due to the favorable impact of the February 2021 polar vortex weather event, and the impacts of the 2020 rate case settlement at Northern Natural Gas;
- \$79 million lower net income at BHE Renewables, primarily due to lower wind tax equity investment earnings from net losses on existing tax equity investments, largely due to the February 2021 polar vortex weather event, partially offset by increased income tax benefits from projects reaching commercial operation;

- \$74 million higher net income at HomeServices, primarily due to higher earnings from mortgage services (63% increase in funded mortgage volume) and brokerage services (35% increase in closed transaction volume) largely attributable to the favorable interest rate environment; and
- \$925 higher net loss at BHE and Other due to the \$857 million unfavorable change in the after-tax unrealized position of the Company's investment in BYD Company Limited, \$38 million of dividends on BHE's 4.00% Perpetual Preferred Stock issued to certain subsidiaries of Berkshire Hathaway in October 2020, higher BHE corporate interest expense from debt issuances in March and October 2020 and higher other corporate costs, partially offset by favorable changes in the cash surrender value of corporate-owned life insurance policies.

Reportable Segment Results

PacifiCorp

Operating revenue increased \$36 million for the first quarter of 2021 compared to 2020, primarily due to higher retail revenue of \$20 million and higher wholesale and other revenue of \$16 million. Retail revenue increased due to higher customer volumes of \$15 million and price impacts of \$5 million from changes in sales mix, partially offset by lower rates due to certain general rate case orders. Retail customer volumes increased 0.3%, primarily due to an increase in the average number of customers and the favorable impact of weather, partially offset by lower customer usage. Wholesale and other revenue increased primarily due to higher wholesale volumes and higher average wholesale market prices.

Net income decreased \$7 million for the first quarter of 2021 compared to 2020, primarily due to higher depreciation and amortization expense, including the impacts of a depreciation study effective in January 2021, lower allowances for equity and borrowed funds used during construction of \$12 million and higher property taxes of \$12 million, partially offset by higher utility margin of \$29 million and favorable income tax expense from the impacts of ratemaking and higher PTCs recognized due to new wind-powered generating facilities placed in-service. Utility margin increased primarily due to the higher retail and wholesale revenue and lower purchased power costs, partially offset by higher natural gas-fueled and coal-fueled generation costs and higher net amortization of deferred net power costs in accordance with established adjustment mechanisms.

MidAmerican Funding

Operating revenue increased \$381 million for the first quarter of 2021 compared to 2020, primarily due to higher natural gas operating revenue of \$303 million and higher electric operating revenue of \$74 million. Natural gas operating revenue increased due to a higher average per-unit cost of natural gas sold, primarily due to the February 2021 polar vortex weather event resulting in higher purchased gas adjustment recoveries of \$304 million (offset in cost of sales). Electric operating revenue increased due to higher retail revenue of \$40 million and higher wholesale and other revenue of \$32 million mainly from higher wholesale volumes. Electric retail revenue increased primarily due to \$32 million higher recoveries through the energy adjustment clauses (offset primarily in cost of sales), higher customer volumes of \$5 million and price impacts of \$5 million from changes in sales mix. Electric retail customer volumes increased 4.9% due to the favorable impact of weather and increased usage of certain industrial customers.

Net income decreased \$6 million for the first quarter of 2021 compared to 2020, primarily due to higher depreciation and amortization expense of \$31 million from additional assets placed in-service and the expiration of a regulatory mechanism deferring certain depreciation expense and \$28 million higher operations and maintenance expenses, partially offset by a favorable income tax benefit and favorable changes in the cash surrender value of corporate-owned life insurance policies. Higher operations and maintenance expenses included increased costs associated with additional wind-powered generating facilities placed in-service as well as higher electric and natural gas distribution costs. The favorable income tax benefit was mainly due to higher PTCs recognized from higher wind-powered generation, driven primarily by new wind projects placed in-service, partially offset by the impacts of ratemaking. Electric utility margin increased \$3 million as the higher retail and wholesale revenue was largely offset by higher generation and purchased power costs.

NV Energy

Operating revenue decreased \$31 million for the first quarter of 2021 compared to 2020, primarily due to lower electric operating revenue of \$22 million and lower natural gas operating revenue of \$9 million. Electric operating revenue decreased primarily due to lower base tariff general rates of \$14 million, lower retail customer volumes, lower fully-bundled energy rates (offset in cost of sales) of \$4 million and price impacts from changes in sales mix. Electric retail customer volumes, including distribution only service customers, decreased 3.2%, primarily due to the impacts of COVID-19, which resulted in lower distribution only service, industrial and commercial customer usage and higher residential customer usage, partially offset by the favorable impact of weather. Natural gas operating revenue decreased due to a lower average per-unit cost of natural gas sold (offset in cost of sales).

Net income increased \$14 million for the first quarter of 2021 compared to 2020, primarily due to lower operations and maintenance expense of \$22 million, primarily from lower regulatory instructed deferrals and amortizations and lower plant operations and maintenance costs, favorable changes in the cash surrender value of corporate-owned life insurance policies, lower interest expense of \$7 million and lower income tax expense from the impacts of ratemaking, partially offset by lower electric utility margin of \$18 million and higher depreciation and amortization expense of \$13 million, mainly from the regulatory amortization of decommissioning costs and higher plant placed in-service. Electric utility margin decreased primarily due to the lower base tariff general rates at Nevada Power, lower retail customer volumes and price impacts from changes in sales mix.

Northern Powergrid

Operating revenue increased \$34 million for the first quarter of 2021 compared to 2020, primarily due to \$21 million from the weaker United States dollar and higher distribution revenue of \$13 million, mainly from increased tariff rates of \$10 million. Net income increased \$17 million for the first quarter of 2021 compared to 2020, primarily due to the higher distribution revenue and \$7 million from the weaker United States dollar.

BHE Pipeline Group

Operating revenue increased \$692 million for the first quarter of 2021 compared to 2020, primarily due to \$559 million of incremental revenue at BHE GT&S, acquired in November 2020, higher gas sales at Northern Natural Gas of \$91 million and higher transportation revenue of \$33 million at Northern Natural Gas, largely due to the favorable impacts of the February 2021 polar vortex weather event. Net income increased \$204 million for the first quarter of 2021 compared to 2020, primarily due to \$107 million of incremental net income at BHE GT&S and higher earnings of \$98 million at Northern Natural Gas. Northern Natural Gas' improved performance was primarily due to higher gross margin on gas sales of \$75 million, higher transportation revenue and the impacts of the 2020 rate case settlement.

BHE Transmission

Operating revenue increased \$8 million for the first quarter of 2021 compared to 2020, primarily due to \$10 million from the stronger United States dollar and higher revenue from the Montana-Alberta Tie-Line, acquired in May 2020, partially offset by the impacts of a regulatory decision received in November 2020 at AltaLink. Net income increased \$4 million for the first quarter of 2021 compared to 2020, primarily due to higher earnings from the Montana-Alberta Tie-Line and lower non-regulated interest expense at BHE Canada.

BHE Renewables

Operating revenue increased \$12 million for the first quarter of 2021 compared to 2020, primarily due to higher hydro, geothermal and solar revenues from higher generation as well as favorable pricing at the geothermal facilities. Net income decreased \$79 million for the first quarter 2021 compared to 2020, primarily due to lower wind tax equity investment earnings of \$93 million, partially offset by the higher operating revenue. Wind tax equity investment earnings decreased due to unfavorable results from existing tax equity investments of \$138 million, primarily due to the February 2021 polar vortex weather event, partially offset by increased income tax benefits from projects reaching commercial operation.

HomeServices

Operating revenue increased \$339 million for the first quarter of 2021 compared to 2020, primarily due to higher brokerage revenue of \$228 million from a 35% increase in closed transaction volume and higher mortgage revenue of \$92 million from a 63% increase in funded mortgage volume due to an increase in refinance activity from the favorable interest rate environment. Net income increased \$74 million for the first quarter of 2021 compared to 2020, primarily due to higher earnings from mortgage services of \$36 million and brokerage services of \$27 million largely attributable to the favorable interest rate environment.

BHE and Other

Operating revenue increased \$83 million for the first quarter of 2021 compared to 2020, primarily due to higher electricity and natural gas sales revenue at MidAmerican Energy Services, LLC, from favorable pricing offset by lower volumes. Net loss increased \$925 million for the first quarter of 2021 compared to 2020, primarily due to the \$857 million unfavorable change in the after-tax unrealized position of the Company's investment in BYD Company Limited, \$38 million of dividends on BHE's 4.00% Perpetual Preferred Stock issued to certain subsidiaries of Berkshire Hathaway in October 2020, higher BHE corporate interest expense from debt issuances in March and October 2020 and higher other corporate costs, partially offset by favorable changes in the cash surrender value of corporate-owned life insurance policies.

Liquidity and Capital Resources

Each of BHE's direct and indirect subsidiaries is organized as a legal entity separate and apart from BHE and its other subsidiaries. It should not be assumed that the assets of any subsidiary will be available to satisfy BHE's obligations or the obligations of its other subsidiaries. However, unrestricted cash or other assets that are available for distribution may, subject to applicable law, regulatory commitments and the terms of financing and ring-fencing arrangements for such parties, be advanced, loaned, paid as dividends or otherwise distributed or contributed to BHE or affiliates thereof. The Company's long-term debt may include provisions that allow BHE or its subsidiaries to redeem such debt in whole or in part at any time. These provisions generally include make-whole premiums. Refer to Note 18 of Notes to Consolidated Financial Statements in Item 8 of the Company's Annual Report on Form 10-K for the year ended December 31, 2020 for further discussion regarding the limitation of distributions from BHE's subsidiaries.

As of March 31, 2021, the Company's total net liquidity was as follows (in millions):

	BHE	PacifiCorp	MidAmerican Funding	NV Energy	Northern Powergrid	BHE Canada	Other	Total
Cash and cash equivalents	\$ 418	\$ 43	\$ 38	\$ 103	\$ 83	\$ 71	\$ 520	\$ 1,276
Credit facilities	3,500	1,200	1,509	650	207	935	3,232	11,233
Less:								
Short-term debt	—	(95)	(387)	(55)	—	(218)	(1,944)	(2,699)
Tax-exempt bond support and letters of credit	—	(218)	(370)	—	—	(2)	—	(590)
Net credit facilities	3,500	887	752	595	207	715	1,288	7,944
Total net liquidity	<u>\$ 3,918</u>	<u>\$ 930</u>	<u>\$ 790</u>	<u>\$ 698</u>	<u>\$ 290</u>	<u>\$ 786</u>	<u>\$ 1,808</u>	<u>\$ 9,220</u>
Credit facilities:								
Maturity dates	<u>2022</u>	<u>2022</u>	<u>2021, 2022</u>	<u>2022</u>	<u>2023</u>	<u>2021, 2024</u>	<u>2021, 2022</u>	

Operating Activities

Net cash flows from operating activities for the three-month periods ended March 31, 2021 and 2020 were \$1.5 billion and \$1.2 billion, respectively. The increase was primarily due to improved operating results and favorable income tax cash flows, partially offset by changes in working capital.

The timing of the Company's income tax cash flows from period to period can be significantly affected by the estimated federal income tax payment methods and assumptions used for each payment date.

Investing Activities

Net cash flows from investing activities for the three-month periods ended March 31, 2021 and 2020 were \$(1.4) billion and \$(1.5) billion, respectively. The change was primarily due to lower funding of tax equity investments and lower capital expenditures of \$61 million. Refer to "Future Uses of Cash" for further discussion of capital expenditures.

Financing Activities

Net cash flows from financing activities for the three-month period ended March 31, 2021 was \$(191) million. Sources of cash totaled \$409 million and consisted of net proceeds from short-term debt. Uses of cash totaled \$600 million and consisted mainly of repayments of BHE senior debt totaling \$450 million, distributions to noncontrolling interests of \$115 million and repayments of subsidiary debt totaling \$26 million.

For a discussion of recent financing transactions, refer to Note 5 of Notes to Consolidated Financial Statements in Part I, Item 1 of this Form 10-Q.

Net cash flows from financing activities for the three-month period ended March 31, 2020 was \$1.4 billion. Sources of cash totaled \$4.3 billion and consisted of proceeds from BHE senior debt issuances totaling \$3.2 billion and subsidiary debt issuances totaling \$1.1 billion. Uses of cash totaled \$3.0 billion and consisted mainly of repayments of subsidiary debt totaling \$1.3 billion, net repayments of short-term debt totaling \$1.1 billion, repayments of BHE senior debt totaling \$350 million and common stock repurchases totaling \$126 million.

The Company may from time to time seek to acquire its outstanding debt securities through cash purchases in the open market, privately negotiated transactions or otherwise. Any debt securities repurchased by the Company may be reissued or resold by the Company from time to time and will depend on prevailing market conditions, the Company's liquidity requirements, contractual restrictions and other factors. The amounts involved may be material.

Future Uses of Cash

The Company has available a variety of sources of liquidity and capital resources, both internal and external, including net cash flows from operating activities, public and private debt offerings, the issuance of commercial paper, the use of unsecured revolving credit facilities, the issuance of equity and other sources. These sources are expected to provide funds required for current operations, capital expenditures, acquisitions, investments, debt retirements and other capital requirements. The availability and terms under which BHE and each subsidiary has access to external financing depends on a variety of factors, including regulatory approvals, its credit ratings, investors' judgment of risk and conditions in the overall capital markets, including the condition of the utility industry and project finance markets, among other items.

Capital Expenditures

The Company has significant future capital requirements. Capital expenditure needs are reviewed regularly by management and may change significantly as a result of these reviews, which may consider, among other factors, impacts to customers' rates; changes in environmental and other rules and regulations; outcomes of regulatory proceedings; changes in income tax laws; general business conditions; load projections; system reliability standards; the cost and efficiency of construction labor, equipment and materials; commodity prices; and the cost and availability of capital. Expenditures for certain assets may ultimately include acquisitions of existing assets.

The Company's historical and forecast capital expenditures, each of which exclude amounts for non-cash equity AFUDC and other non-cash items, are as follows (in millions):

	Three-Month Periods Ended March 31,		Annual Forecast
	2020	2021	2021
Capital expenditures by business:			
PacifiCorp	\$ 366	\$ 439	\$ 1,897
MidAmerican Funding	472	298	2,200
NV Energy	163	167	854
Northern Powergrid	159	179	732
BHE Pipeline Group	120	102	1,204
BHE Transmission	56	77	279
BHE Renewables	12	18	95
HomeServices	7	8	39
BHE and Other ⁽¹⁾	1	7	78
Total	<u>\$ 1,356</u>	<u>\$ 1,295</u>	<u>\$ 7,378</u>
Capital expenditures by type:			
Wind generation	\$ 273	\$ 97	\$ 1,158
Electric distribution	365	427	1,849
Electric transmission	185	157	1,006
Natural gas transmission and storage	49	85	1,032
Solar generation	—	4	295
Other	484	525	2,038
Total	<u>\$ 1,356</u>	<u>\$ 1,295</u>	<u>\$ 7,378</u>

(1) BHE and Other represents amounts related principally to other entities, corporate functions and intersegment eliminations.

The Company's historical and forecast capital expenditures consisted mainly of the following:

- Wind generation expenditures include the following:
 - Construction and acquisition of wind-powered generating facilities at MidAmerican Energy totaling \$154 million for the three-month period ended March 31, 2020. MidAmerican Energy's forecast expenditures in 2021 for the construction of additional wind-powered generating facilities total \$391 million and include 202 MWs of wind-powered generating facilities expected to be placed in-service in 2021.
 - Repowering of wind-powered generating facilities at MidAmerican Energy totaling \$24 million and \$6 million for the three-month periods ended March 31, 2021 and 2020, respectively. The repowering projects entail the replacement of significant components of older turbines. Planned spending for the repowered generating facilities totals \$379 million for the remainder of 2021. MidAmerican Energy expects its repowered facilities to meet Internal Revenue Service guidelines for the re-establishment of PTCs for 10 years from the date the facilities are placed in-service. The rate at which PTCs are re-established for a facility depends upon the date construction begins. Of the 1,078 MWs of current repowering projects not in-service as of March 31, 2021, 80 MWs are currently expected to qualify for 100% of the federal PTCs available for 10 years following each facility's return to service, 591 MWs are expected to qualify for 80% of such credits and 407 MWs are expected to qualify for 60% of such credits.

- Construction of wind-powered generating facilities at PacifiCorp totaling \$27 million and \$89 million for the three-month periods ended March 31, 2021 and 2020, respectively, and includes the 674 MWs of new wind-powered generating facilities that were placed in-service in 2020 and 516 MWs expected to be placed in-service in 2021. The energy production from the new wind-powered generating facilities is expected to qualify for 100% of the federal PTCs available for 10 years once the equipment is placed in-service. PacifiCorp's 2019 IRP identified 1,920 MWs of new wind-powered generating resources that are expected to come online in 2024. PacifiCorp anticipates that the additional new wind-powered generation will be a mixture of owned and contracted resources. PacifiCorp anticipates costs associated with the construction of wind-powered generating facilities will total an additional \$100 million for 2021.
- Repowering existing wind-powered generating facilities at PacifiCorp totaling \$5 million and \$16 million for the three-month periods ended March 31, 2021 and 2020, respectively. The repowering projects entail the replacement of significant components of older turbines. Certain repowering projects were placed in service in 2019 and 2020 and the remaining repowering projects are expected to be placed in-service in 2021. The energy production from such repowered facilities is expected to qualify for 100% of the federal PTCs available for 10 years following each facility's return to service. Planned additional spending for certain existing wind-powered generating facilities totals \$6 million for 2021.
- Acquisition and repowering of wind-powered generating facilities at PacifiCorp totaling \$1 million for the three-month period ended March 31, 2021. Planned additional spending for these wind-powered generating facilities totals \$44 million for 2021.
- Electric distribution includes both growth and operating expenditures. Growth expenditures include new customer connections and enhancements to existing customer connections. Operating expenditures include ongoing distribution systems infrastructure needed at the Utilities and Northern Powergrid, wildfire mitigation, damage restoration and storm damage repairs and investments in routine expenditures for distribution needed to serve existing and expected demand.
- Electric transmission includes both growth and operating expenditures. Growth expenditures include PacifiCorp's costs for the 140-mile 500-kV Aeolus-Bridger/Anticline transmission line, which is a major segment of PacifiCorp's Energy Gateway Transmission expansion program, placed in-service in November 2020, the Nevada Utilities' Greenlink Nevada transmission expansion program and AltaLink's directly assigned projects from the Alberta Electric System Operator. Operating expenditures include system reinforcement, upgrades and replacements of facilities to maintain system reliability and investments in routine expenditures for transmission needed to serve existing and expected demand.
- Natural gas transmission and storage includes both growth and operating expenditures. Growth expenditures include, among other items, the Northern Natural Gas New Lisbon Expansion and Twin Cities Area Expansion projects. Operating expenditures include, among other items, asset modernization and pipeline integrity projects.
- Solar generation includes growth expenditures, including MidAmerican Energy's current plan for the construction of 117 MWs of small- and utility-scale solar generation during 2021, of which 37 MWs are expected to be placed in-service in 2021. Nevada Power's solar generation investment includes expenditures for a 150 MWs solar photovoltaic facility with an additional 100 MWs capacity of co-located battery storage, known as the Dry Lake generating facility. Commercial operation at Dry Lake is expected by the end of 2023.
- Other capital expenditures includes both growth and operating expenditures, including routine expenditures for generation and other infrastructure needed to serve existing and expected demand, natural gas distribution, technology, and environmental spending relating to emissions control equipment and the management of coal combustion residuals.

Other Renewable Investments

The Company has invested in projects sponsored by third parties, commonly referred to as tax equity investments. Under the terms of these tax equity investments, the Company has entered into equity capital contribution agreements with the project sponsors that require contributions. The Company has made no contributions for the three-month period ended March 31, 2021, and has commitments as of March 31, 2021, subject to satisfaction of certain specified conditions, to provide equity contributions of \$616 million for the remainder of 2021 pursuant to these equity capital contribution agreements as the various projects achieve commercial operation. Once a project achieves commercial operation, the Company enters into a partnership agreement with the project sponsor that directs and allocates the operating profits and tax benefits from the project.

Contractual Obligations

As of March 31, 2021, there have been no material changes outside the normal course of business in contractual obligations from the information provided in Item 7 of the Company's Annual Report on Form 10-K for the year ended December 31, 2020 other than the recent financing transactions and renewable tax equity investments previously discussed.

Quad Cities Generating Station Operating Status

Exelon Generation Company, LLC ("Exelon Generation"), the operator of Quad Cities Generating Station Units 1 and 2 ("Quad Cities Station") of which MidAmerican Energy has a 25% ownership interest, announced on June 2, 2016, its intention to shut down Quad Cities Station on June 1, 2018. In December 2016, Illinois passed legislation creating a zero emission standard, which went into effect June 1, 2017. The zero emission standard requires the Illinois Power Agency to purchase zero emission credits ("ZECs") and recover the costs from certain ratepayers in Illinois, subject to certain limitations. The proceeds from the ZECs will provide Exelon Generation additional revenue through 2027 as an incentive for continued operation of Quad Cities Station. MidAmerican Energy will not receive additional revenue from the subsidy.

The PJM Interconnection, L.L.C. ("PJM") capacity market includes a Minimum Offer Price Rule ("MOPR"). If a generation resource is subjected to a MOPR, its offer price in the market is adjusted to effectively remove the revenues it receives through a government-provided financial support program, resulting in a higher offer that may not clear the capacity market. Prior to December 19, 2019, the PJM MOPR applied only to certain new gas-fired resources. An expanded PJM MOPR to include existing resources would require exclusion of ZEC compensation when bidding into future capacity auctions, resulting in an increased risk of Quad Cities Station not receiving capacity revenues in future auctions.

On December 19, 2019, the FERC issued an order requiring the PJM to broadly apply the MOPR to all new and existing resources, including nuclear. This greatly expands the breadth and scope of the PJM's MOPR, which is effective as of the PJM's next capacity auction. While the FERC included some limited exemptions in its order, no exemptions were available to state-supported nuclear resources, such as Quad Cities Station. The FERC provided no new mechanism for accommodating state-supported resources other than the existing Fixed Resource Requirement ("FRR") mechanism under which an entire utility zone would be removed from PJM's capacity auction along with sufficient resources to support the load in such zone. In response to the FERC's order, the PJM submitted a compliance filing on March 18, 2020, wherein the PJM proposed tariff language reflecting the FERC's directives and a schedule for resuming capacity auctions. On April 16, 2020, the FERC issued an order largely denying requests for rehearing of the FERC's December 2019 order but granting a few clarifications that required an additional PJM compliance filing, which the PJM submitted on June 1, 2020. On October 15, 2020, the FERC issued an order denying requests for rehearing of its April 16, 2020 order and accepting the PJM's two compliance filings, subject to a further compliance filing to revise minor aspects of the proposed MOPR methodology. As part of that order, the FERC also accepted the PJM's proposal to condense the schedule of activities leading up to the next capacity auction but did not specify when that schedule would commence given that a key element of the MOPR level computation remains pending before the FERC in another proceeding. In November 2020, the PJM announced that the next capacity auction will be conducted in May 2021.

On May 21, 2020, the FERC issued an order involving reforms to the PJM's day-ahead and real-time reserves markets that need to be reflected in the calculation of MOPR levels. In approving reforms to the PJM's reserves markets, the FERC also directed the PJM to develop a new methodology for estimating revenues that resources will receive for sales of energy and related services, which will then be used in calculating a number of parameters and assumptions used in the capacity market, including MOPR levels. The PJM submitted its new revenue projection methodology on August 5, 2020. On review of this compliance filing, the FERC is expected to address how these additional reforms will impact MOPR levels, the timeline for implementing the new revenue projection methodology, and the timing for commencing the capacity auction schedule.

Exelon Generation is currently working with the PJM and other stakeholders to pursue the FRR option as an alternative to the next PJM capacity auction. If Illinois implements the FRR option, Quad Cities Station could be removed from the PJM's capacity auction and instead supply capacity and be compensated under the FRR program. If Illinois cannot implement an FRR program in its PJM zones, then the MOPR will apply to Quad Cities Station, resulting in higher offers for its units that may not clear the capacity market. Implementing the FRR program in Illinois will require both legislative and regulatory changes. MidAmerican Energy cannot predict whether or when such legislative and regulatory changes can be implemented or their potential impact on the continued operation of Quad Cities Station.

Regulatory Matters

BHE's regulated subsidiaries and certain affiliates are subject to comprehensive regulation. The discussion below contains material developments to those matters disclosed in Item 1 of each Registrant's Annual Report on Form 10-K for the year ended December 31, 2020 and new regulatory matters occurring in 2021.

PacifiCorp

Utah

In March 2020, PacifiCorp filed its annual EBA application with the UPSC requesting recovery of \$37 million of deferred power costs from customers for the period January 1, 2019 through December 31, 2019, reflecting the difference between base and actual net power costs in the 2019 deferral period. This reflected a 1.0% increase compared to current rates. The UPSC approved the request in February 2021 for rates effective March 1, 2021.

Oregon

In February 2020, PacifiCorp filed a general rate case, and in December 2020, the OPUC approved a net rate decrease of approximately \$24 million, or 1.8%, effective January 1, 2021, accepting PacifiCorp's proposed annual credit to customers of the remaining 2017 Tax Reform benefits over a two-year period. PacifiCorp's compliance filing to reset base rates effective January 1, 2021 in response to the OPUC's order reflected a rate decrease of approximately \$67 million, or 5.1%, due to the exclusion of the impacts of repowered wind facilities, new wind facilities and certain other new investments that had not been placed in service at the time of the filing. Additional compliance filings will be made to include these investments in rates concurrent when they are placed in service. In January 2021, the OPUC approved the second compliance filing to add the remainder of the Ekola Flats wind facility to rates, resulting in a rate increase of approximately \$7 million, or 0.5%, effective January 12, 2021. In April 2021, the OPUC approved the third compliance filing to add the Foote Creek repowered wind facility and the Pryor Mountain new wind facility to rates, resulting in a rate increase of \$14 million, or 1.2%, effective April 9, 2021.

Wyoming

In September 2018, PacifiCorp filed an application for depreciation rate changes with the WPSC based on PacifiCorp's 2018 depreciation rate study, requesting the rates become effective January 1, 2021. Updates since September 2018 include the filing of PacifiCorp's 2020 decommissioning studies in which a third-party consultant was engaged to estimate decommissioning costs associated with coal-fueled generating facilities and removal of Cholla Unit 4. In April 2020, PacifiCorp filed a stipulation with the WPSC resolving all issues addressed in PacifiCorp's depreciation rate study application with ratemaking treatment of certain matters to be addressed in PacifiCorp's general rate case, including depreciation for coal-fueled generating facilities and associated incremental decommissioning costs reflected in decommissioning studies and certain matters related to the repowering of PacifiCorp's wind-powered generating facilities. The stipulation was approved by the WPSC during a hearing in August 2020 and a subsequent written order in December 2020. The general rate case hearing was rescheduled for February 2021. As a result of the hearing date change, PacifiCorp filed an application in October 2020 with the WPSC requesting authorization to defer costs associated with impacts of the depreciation study. A hearing for this deferral application is scheduled to occur in July 2021.

In March 2020, PacifiCorp filed a general rate case with the WPSC which reflected recovery of Energy Vision 2020 investments, updated depreciation rates, incremental decommissioning costs associated with coal-fueled facilities and rate design modernization proposals. The application also requested a revision to the ECAM to eliminate the sharing band and requested authorization to discontinue operations and recover costs associated with the early retirement of Cholla Unit 4. The proposed increase reflects several rate mitigation measures that include use of the remaining 2017 Tax Reform benefits to buy down plant balances, including Cholla Unit 4, and spreading the recovery of the depreciation of certain coal-fueled generation units over time periods that extend beyond the depreciable lives proposed in the depreciation rate study. In September 2020, PacifiCorp filed its rebuttal testimony that modified its requested increase in base rates from \$7 million to \$9 million, or 1.3%, and reflected an update to the rate mitigation measures for using the 2017 Tax Reform benefits. The WPSC determined that the rebuttal testimony filed constituted a material and substantial change to the original application and vacated the hearing that was scheduled for October 2020. The WPSC re-noticed PacifiCorp's case and rescheduled the hearings. The hearings began February 2021 and were completed in March 2021. The WPSC decision is pending. PacifiCorp has requested a rate effective date of July 1, 2021.

In April 2021, PacifiCorp filed its annual ECAM and RRA application with the WPSC requesting to refund \$15 million of deferred net power costs and RECs to customers for the period January 1, 2020 through December 31, 2020, reflecting the difference between base and actual net power costs in the 2020 deferral period. This reflects a 2.4% decrease compared to current rates. PacifiCorp has requested an interim rate effective date of July 1, 2021.

Idaho

In March 2021, PacifiCorp filed its annual ECAM application with the IPUC requesting recovery of \$14 million for deferred costs in 2020. This filing includes recovery of the difference in actual net power costs to the base level in rates, an adder for recovery of the Lake Side 2 resource, changes in PTCs, RECs, and a resource tracking mechanism to match costs with the benefits of new wind and wind repowering projects until they are reflected in base rates. This reflects a 1.1% decrease compared to current rates.

California

California Senate Bill 901 requires electric utilities to prepare and submit wildfire mitigation plans that describe the utilities' plans to prevent, combat and respond to wildfires affecting their service territories. PacifiCorp submitted its 2021 California Wildfire Mitigation Plan Update in March 2021.

FERC Show Cause Order

On April 15, 2021, the FERC issued an order to show cause and notice of proposed penalty related to allegations made by FERC Office of Enforcement staff that PacifiCorp failed to comply with certain North American Electric Reliability Corporation (the "NERC") reliability standards associated with facility ratings on PacifiCorp's bulk electric system. The order directs PacifiCorp to show cause as to why it should not be assessed a civil penalty of \$42 million as a result of the alleged violations. The allegations are related to PacifiCorp's response to a 2010 industry-wide effort directed by the NERC to identify and remediate certain discrepancies resulting from transmission facility design and actual field conditions, including transmission line clearances. PacifiCorp will file a response to the allegations with the FERC.

MidAmerican Energy

Natural Gas Purchased for Resale

In February 2021, severe cold weather over the central United States caused disruptions in natural gas supply from the southern part of the United States. These disruptions, combined with increased demand, resulted in historically high prices for natural gas purchased for resale to MidAmerican Energy's retail customers and caused an approximate \$245 million increase in natural gas costs above those normally expected. To mitigate the impact to customers, the IUB ordered the recovery of these higher costs to be applied to natural gas sales over the period April 2021 through April 2022. While sufficient liquidity is available to MidAmerican Energy, the increased costs and longer recovery period resulted in higher working capital requirements during the three-month period ended March 31, 2021.

Price Stability Tariff

In November 2018, the Nevada Utilities made filings with the PUCN to implement the Customer Price Stability Tariff ("CPST"). The Nevada Utilities have designed the CPST to provide certain customers, namely those eligible to file an application pursuant to Chapter 704B of the Nevada Revised Statutes, with a market-based pricing option that is based on renewable resources. The CPST provides for an energy rate that would replace the Base Tariff Energy Rate and DEAA. The goal is to have an energy rate that yields an all-in effective rate that is competitive with market options available to such customers. In February 2019, the PUCN granted several intervenors the ability to participate in the proceeding. In June 2019, the Nevada Utilities withdrew their filings. In May 2020, the Nevada Utilities refiled the CPST incorporating the considerations raised by the PUCN and other intervenors and a hearing was held in September 2020. In November 2020, the PUCN issued an order approving the tariff with modified pricing and directing the Nevada Utilities to develop a methodology by which all eligible participants may have the opportunity to participate in the CPST program up to a limit with the same proportion of governmental entities' and non-governmental entities' MWh reserved for potentially interested customers as filed. In December 2020, the Nevada Utilities filed a petition for reconsideration of the pricing ordered by the PUCN. In January 2021, the PUCN issued an order reaffirming its order from November 2020 and denying the petition for a rehearing. In the first quarter of 2021, the Nevada Utilities filed an update to the CPST program per the November 2020 order and an updated CPST tariff with the PUCN. An order is expected in the second quarter of 2021.

Natural Disaster Protection Plan

The Nevada Utilities submitted their initial natural disaster protection plan to the PUCN and filed their first application seeking recovery of 2019 expenditures in February 2020. In June 2020, a hearing was held and an order was issued in August 2020 that granted the joint application, made minor adjustments to the budget and approved the 2019 costs for recovery starting in October 2020. In October 2020, intervening parties filed petitions for reconsideration. Intervenors have filed a petition for judicial review with the District Court in November 2020. In December 2020, the PUCN issued a second modified final order approving the natural disaster protection plan, as modified, and reopened its investigation and rulemaking on Senate Bill 329 to address rate design issues raised by intervenors. The comment period for the reopened investigation and rulemaking ended in early February 2021 and an order is expected in the second quarter of 2021. In March 2021, the Nevada Utilities filed an application seeking recovery of the 2020 expenditures, approval for an update to the initial natural disaster protection plan that was ordered by the PUCN and filed their first amendment to the 2020 natural disaster protection plan.

Northern Powergrid Distribution Companies

In December 2020, GEMA, through Ofgem, published its final determinations for transmission and gas distribution networks in Great Britain. These determinations do not apply directly to Northern Powergrid, but aspects of the proposals are capable of application at Northern Powergrid's next price control, ("ED2"), which will begin in April 2023. Regarding allowed return on capital, Ofgem determined a cost of equity of 4.55% (plus inflation calculated using the United Kingdom's consumer price index including owner occupiers' housing costs ("CPIH")). In March 2021, all the transmission and gas distribution networks lodged appeals with the Competition and Markets Authority against Ofgem's determination for the cost of equity.

In December 2020, in respect of electricity distribution, GEMA published its decision on the methodology it will use to set the ED2 price control and prices from April 2023 to March 2028. This confirmed that Ofgem will apply many aspects of the proposals from the transmission and gas distribution price controls to electricity distribution.

GEMA published a separate decision in March 2021, confirming that the financial aspects in respect of electricity distribution would broadly follow the transmission and gas distribution methodology, setting a working assumption for a cost of equity at 4.65% (plus CPIH), ahead of the final determinations in late 2022. When placed on a comparable footing, by adjusting for differences in the assumed equity ratio and the measure of inflation used, the working assumption for ED2 is approximately 150 basis points lower than the current cost of equity.

BHE Pipeline Group

BHE GT&S

In January 2020, pursuant to the terms of a previous settlement, Cove Point filed a general rate case for its FERC-jurisdictional services, with proposed rates to be effective March 1, 2020. Cove Point proposed an annual cost-of-service of \$182 million. In February 2020, the FERC approved suspending the changes in rates for five months following the proposed effective date, until August 1, 2020, subject to refund. In November 2020, Cove Point reached an agreement in principle with the active participants in the general rate case proceeding. Under the terms of the agreement in principle, Cove Point's rates effective August 1, 2020 result in an increase to annual revenues of \$4 million and a decrease in annual depreciation expense of \$1 million, compared to the rates in effect prior to August 1, 2020. The interim settlement rates were implemented November 1, 2020, and Cove Point's provision for rate refunds for August 2020 through October 2020 totaled \$7 million. The agreement in principle was reflected in a stipulation and agreement filed with the FERC in January 2021. In March 2021, the FERC approved the stipulation and agreement and the rate refunds to customers were processed in late April.

BHE Transmission

AltaLink

Tariff Refund Application

In January 2021, driven by the pandemic and economic shutdown that has negatively impacted all Albertans, AltaLink filed an application with the AUC that requested approval of tariff relief measures totaling C\$350 million over the three-year period, 2021 to 2023. The tariff relief measures consist of a proposed refund to customers of C\$150 million of previously collected future income taxes and C\$200 million of surplus accumulated depreciation. The future income tax refund would be evenly distributed over the two-year period, 2021 to 2022, with C\$75 million included in each year. The accumulated depreciation surplus would be refunded over the three-year period, 2021 to 2023, with C\$60 million included in 2021 and 2022, and C\$80 million in 2023. If approved by the AUC, these tariff relief measures would have saved customers an estimated C\$317 million over the three-year period, 2021 to 2023.

In March 2021, the AUC issued a decision on AltaLink's Tariff Refund Application and approved a 2021 tariff refund in the amount of C\$230 million and a net 2021 tariff reduction of C\$224 million, which provides Alberta ratepayers with immediate tariff relief in 2021. The approved 2021 tariff refund includes a refund of C\$150 million of previously collected future income tax and a refund of C\$80 million of accumulated depreciation surplus. Tariff relief measures for years 2022 and 2023 will be proposed in AltaLink's 2022-2023 GTA.

2019-2021 General Tariff Application

In August 2018, AltaLink filed its 2019-2021 GTA with the AUC, delivering on the first three years of its commitment to keep rates lower or flat at the approved 2018 revenue requirement of C\$904 million for customers for the next five years. In addition, AltaLink proposed to provide a further tariff reduction over the three year period by refunding previously collected accumulated depreciation surplus of an additional C\$31 million. In April 2019, AltaLink filed an update to its 2019-2021 GTA primarily to reflect its 2018 actual results and the impact of the AUC's decision on AltaLink's 2014-2015 Deferral Accounts Reconciliation Application. The application requested the approval of revised revenue requirements of C\$879 million, C\$882 million and C\$885 million for 2019, 2020 and 2021, respectively.

In July 2019, AltaLink filed a 2019-2021 partial negotiated settlement application with the AUC. The application consisted of negotiated reductions that resulted in a net decrease of C\$38 million to the three year total revenue requirement applied for in AltaLink's 2019-2021 GTA updated in April 2019. However, this was offset by AltaLink's request for an additional C\$20 million of forecast transmission line clearance capital as part of an excluded matter. The 2019-2021 negotiated settlement agreement excluded certain matters related to the new salvage study and salvage recovery approach, additional capital spending and incremental asset retirements. AltaLink's salvage proposal is estimated to save customers C\$267 million between 2019 and 2023. Excluded matters were examined by the AUC in a hearing held in November 2019, with written arguments filed in January 2020.

In April 2020, the AUC issued its decision with respect to AltaLink's 2019-2021 GTA. The AUC approved the negotiated settlement agreement as filed and rendered its decision and directions on the excluded matters. The AUC declined to approve AltaLink's proposed salvage methodology at that time, but indicated it would initiate a generic proceeding to review the matter on an industry-wide basis. The AUC approved, on a placeholder basis, C\$13 million of the additional C\$20 million AltaLink requested for forecast transmission line clearance capital. The remaining C\$7 million of capital investment was reviewed in AltaLink's subsequent compliance filing. Also, C\$3 million of forecast operating expenses and C\$4 million of forecast capital expenditures related to fire risk mitigation were approved, with an additional C\$31 million of capital expenditures reviewed in the compliance filing. Finally, the AUC approved C\$6 million of retirements for towers and fixtures.

In July 2020, the AUC approved AltaLink's compliance filing establishing revised revenue requirements of C\$895 million for 2019, C\$894 million for 2020 and C\$898 million for 2021, exclusive of the assets transferred to the PiikaniLink Limited Partnership and the KainaiLink Limited Partnership.

The AUC deferred its decision on AltaLink's proposed salvage methodology included in AltaLink's 2019-2021 GTA, pending a generic proceeding to consider the broader implications. This generic proceeding was closed and in July 2020, AltaLink filed an application with the AUC for the review and variance of the AUC's decision with respect to AltaLink's proposed salvage methodology. In September 2020, the AUC granted this review on the basis that there were changed circumstances that could lead the AUC to materially vary or rescind the majority hearing panel's findings on AltaLink's proposed salvage methodology. In October 2020, AltaLink filed responses to information requests from the AUC, written argument was filed by intervening parties and written reply argument was filed by AltaLink. In November 2020, the AUC issued its decision on AltaLink's review and variance application. The AUC decided to vary the original decision and approve AltaLink's proposed net salvage method and the revised transmission tariffs as filed, effective December 2020. The new salvage methodology decreased the amount of salvage pre-collection resulting in reductions to AltaLink's revenue requirement from customers by C\$24 million, C\$27 million and C\$31 million for the years 2019, 2020 and 2021, respectively. AltaLink delivered on the first three years of its commitment to customers to keep rates flat for five years by obtaining the necessary AUC approvals. AltaLink's approved 2019-2021 GTA maintains customer rates below the 2018 level of C\$904 million from 2019 to 2021.

In March 2021, the AUC approved AltaLink's Tariff Refund Application resulting in a revised revenue requirement of C\$873 million and revised transmission tariff of C\$633 million for 2021.

2022-2023 General Tariff Application

In April 2021, AltaLink filed its 2022-2023 GTA delivering on the last two years of its commitment to keep rates flat for customers at or below the 2018 level of C\$904 million for the five-year period from 2019 to 2023. The two-year application achieves flat tariffs continuing to transition to the AUC-approved salvage recovery method, continuing the use of the flow-through income tax method, and adding only a 1% increase to operations and maintenance expense, with the exception of salaries and wages and other expenses. In addition, similar to the C\$80 million refund of the previously collected accumulated depreciation surplus approved by the AUC for 2021, AltaLink proposed to provide further similar tariff reductions over the two years by refunding an additional C\$60 million per year. The application requested the approval of transmission tariff of C\$824 million and C\$847 million for 2022 and 2023, respectively.

2022 Generic Cost of Capital Proceeding

In December 2020, the AUC initiated the 2022 generic cost of capital proceeding. This proceeding will consider the return on equity and deemed equity ratios for 2022 and one or more additional test years. Due to the existing uncertainty as a result of the ongoing COVID-19 pandemic, before establishing a process schedule, the commission has requested participants to submit comments that address the following: (i) the continuation of the currently approved return on equity and deemed equity ratios for a further period of time; (ii) the appropriate test period for the proceeding; (iii) the scope of the proceeding, including whether a formula-based approach to return on equity should be utilized; (iv) the considerations to take into account when establishing the process for the proceeding; and (v) the avoidance of duplicative evidence and greater coordination and collaboration between parties.

In January 2021, AltaLink submitted a letter to the AUC stating that due to ongoing capital market volatility and other COVID-19 related uncertainties there are reasonable grounds for extending the currently approved 2021 return on equity and deemed equity ratio on a final basis for 2022. AltaLink further stated there is insufficient time to complete a full generic cost of capital proceeding in 2021, in order to issue a decision prior to the beginning of 2022 and a formula-based approach should not be considered at this time. AltaLink suggested that a proceeding could be restarted in the third quarter of 2021, for 2023 and subsequent years.

In March 2021, the AUC issued its decision with respect to setting the return on equity and deemed equity ratios for AltaLink. The AUC approved an equity return of 8.5% and an equity ratio of 37% for 2022, based on continuing economic and market uncertainties, the unsettled nature of capital markets, and the need for certainty and stability for Alberta ratepayers.

In April 2021, the Utilities Consumer Advocate filed an application with the Court of Appeal of Alberta requesting permission to appeal the AUC's decision that set the return on equity of 8.5% and equity ratio of 37% on a final basis for 2022. In the appeal, the Utilities Consumer Advocate alleges that the AUC erred by failing to fulfil its statutory obligation of establishing a fair return and by failing to apply procedural fairness.

2019 Deferral Accounts Reconciliation Application

In October 2020, AltaLink filed its application with the AUC, which includes ten projects with total gross capital additions of C\$129 million, including applicable AFUDC. In December 2020, AltaLink provided responses to AUC information requests, interveners filed written argument and AltaLink filed reply argument.

In March 2021, the AUC issued its decision on AltaLink's 2019 Deferral Accounts Reconciliation Application. The AUC approved C\$128.0 million of the C\$128.5 million of gross capital project additions, disallowing C\$0.5 million of capital costs. The AUC also approved the other deferral accounts for taxes other than income taxes, long-term debt and annual structure payments as filed. AltaLink filed its compliance filing in April 2021.

Environmental Laws and Regulations

Each Registrant is subject to federal, state, local and foreign laws and regulations regarding climate change, RPS, air and water quality, emissions performance standards, coal combustion byproduct disposal, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact each Registrant's current and future operations. In addition to imposing continuing compliance obligations, these laws and regulations provide regulators with the authority to levy substantial penalties for noncompliance, including fines, injunctive relief and other sanctions. These laws and regulations are administered by various federal, state, local and international agencies. Each Registrant believes it is in material compliance with all applicable laws and regulations, although many laws and regulations are subject to interpretation that may ultimately be resolved by the courts. The discussion below contains material developments to those matters disclosed in Item 1 of each Registrant's Annual Report on Form 10-K for the year ended December 31, 2020, and new environmental matters occurring in 2021.

Climate Change

In December 2015, an international agreement was negotiated by 195 nations to create a universal framework for coordinated action on climate change in what is referred to as the Paris Agreement. The Paris Agreement reaffirms the goal of limiting global temperature increase well below 2 degrees Celsius, while urging efforts to limit the increase to 1.5 degrees Celsius; establishes commitments by all parties to make nationally determined contributions and pursue domestic measures aimed at achieving the commitments; commits all countries to submit emissions inventories and report regularly on their emissions and progress made in implementing and achieving their nationally determined commitments; and commits all countries to submit new commitments every five years, with the expectation that the commitments will get more aggressive. In the context of the Paris Agreement, the United States agreed to reduce GHG emissions 26% to 28% by 2025 from 2005 levels. After more than 55 countries representing more than 55% of global GHG emissions submitted their ratification documents, the Paris Agreement became effective November 4, 2016. On June 1, 2017, President Trump announced the United States would begin the process of withdrawing from the Paris Agreement. The United States completed its withdrawal from the Paris Agreement on November 4, 2020. President Biden accepted the terms of the climate agreement January 20, 2021, and the United States completed its reentry February 19, 2021. At a Climate Leaders Summit held April 22 through April 23, 2021, President Biden announced new climate goals to cut GHG 50%-52% economy-wide by 2030 compared to 2005 levels, and to reach 100% carbon pollution-free electricity by 2035. Additional details on how the United States will implement these goals is anticipated to be released through fall 2021.

Clean Air Act Regulations

The Clean Air Act is a federal law administered by the EPA that provides a framework for protecting and improving the nation's air quality and controlling sources of air emissions. The implementation of new standards is generally outlined in SIPs, which are a collection of regulations, programs and policies to be followed. SIPs vary by state and are subject to public hearings and EPA approval. Some states may adopt additional or more stringent requirements than those implemented by the EPA. The major Clean Air Act programs most directly affecting the Registrants' operations as described below.

GHG Performance Standards

Under the Clean Air Act, the EPA may establish emissions standards that reflect the degree of emissions reductions achievable through the best technology that has been demonstrated, taking into consideration the cost of achieving those reductions and any non-air quality health and environmental impact and energy requirements. On August 3, 2015, the EPA issued final new source performance standards, establishing a standard of 1,000 pounds of carbon dioxide per MWh for large natural gas-fueled generating facilities and 1,400 pounds of carbon dioxide per MWh for new coal-fueled generating facilities with the "Best System of Emission Reduction" reflecting highly efficient supercritical pulverized coal facilities with partial carbon capture and sequestration or integrated gasification combined-cycle units that are co-fired with natural gas or pre-combustion slipstream capture of carbon dioxide. The new source performance standards were appealed to the D.C. Circuit and oral argument was scheduled for April 17, 2017. However, oral argument was deferred and the court held the case in abeyance for an indefinite period of time. On December 6, 2018, the EPA announced revisions to new source performance standards for new and reconstructed coal-fueled units. EPA proposes to revise carbon dioxide emission limits for new coal-fueled facilities to 1,900 pounds per MWh for small units and 2,000 pounds per MWh for large units. The EPA would define the best system of emission reduction for new and modified units as the most efficient demonstrated steam cycle, combined with best operating practices. On January 12, 2021, EPA finalized a rule focused solely on a significant contribution finding for purposes of regulating source categories' GHG emissions. The final rule sets no specific regulatory standards and contains no regulatory text, nor does it address what constitutes the best system of emission reduction for new, modified and reconstructed electric generating units. EPA confirms in the "significant contribution" rule that electric generating units remain a listed source category under Clean Air Act Section 111(b), reaching that conclusion through the introduction of an emissions threshold framework by which a source category is deemed to contribute significantly to dangerous air pollution due to their GHG emissions if the amount of those emissions exceeds 3% of total GHG emissions in the United States. Under this methodology, no other source category would qualify for regulation. The significant contribution rule will take effect 60 days after publication in the Federal Register but is expected to be quickly revisited by the Biden administration. Because the significant contribution rule did not alter the emission limits or technology requirements of the 2015 rule, any new fossil-fueled generating facilities will be required to meet the GHG new source performance standards. The D.C. Circuit vacated the significant contribution rule April 5, 2021, remanding it for further proceedings.

National Ambient Air Quality Standards

Under the authority of the Clean Air Act, the EPA sets minimum NAAQS for six principal pollutants, consisting of carbon monoxide, lead, NO_x, particulate matter, ozone and SO₂, considered harmful to public health and the environment. Areas that achieve the standards, as determined by ambient air quality monitoring, are characterized as being in attainment, while those that fail to meet the standards are designated as being nonattainment areas. Generally, sources of emissions in a nonattainment area that are determined to contribute to the nonattainment are required to reduce emissions. Currently, with the exceptions described in the following paragraphs, air quality monitoring data indicates that all counties where the relevant Registrant's major emission sources are located are in attainment of the current NAAQS.

In June 2010, the EPA finalized a new NAAQS for SO₂. Under the 2010 rule, areas must meet a one-hour standard of 75 parts per billion utilizing a three-year average. The rule utilizes source modeling in addition to the installation of ambient monitors where SO₂ emissions impact populated areas. Attainment designations were due by June 2012; however, citing a lack of sufficient information to make the designations, the EPA did not issue its final designations until July 2013 and determined, at that date, that a portion of Muscatine County, Iowa was in nonattainment for the one-hour SO₂ standard. MidAmerican Energy's Louisa coal-fueled generating facility is located just outside of Muscatine County, south of the violating monitor. In its final designation, the EPA indicated that it was not yet prepared to conclude that the emissions from the Louisa coal-fueled generating facility contribute to the monitored violation or to other possible violations, and that in a subsequent round of designations, the EPA will make decisions for areas and sources outside Muscatine County. MidAmerican Energy does not believe a subsequent nonattainment designation will have a material impact on the Louisa coal-fueled generating facility. Although the EPA's July 2013 designations did not impact PacifiCorp's nor the Nevada Utilities' generating facilities, the EPA's assessment of SO₂ area designations will continue with the deployment of additional SO₂ monitoring networks across the country. On February 25, 2019, the EPA issued a decision to retain the 2010 SO₂ NAAQS without revision.

The Sierra Club filed a lawsuit against the EPA in August 2013 with respect to the one-hour SO₂ standards and its failure to make certain attainment designations in a timely manner. In March 2015, the United States District Court for the Northern District of California ("Northern District of California") accepted as an enforceable order an agreement between the EPA and Sierra Club to resolve litigation concerning the deadline for completing the designations. The Northern District of California's order directed the EPA to complete designations in three phases: the first phase by July 2, 2016; the second phase by December 31, 2017; and the final phase by December 31, 2020. The first phase of the designations require the EPA to designate two groups of areas: 1) areas that have newly monitored violations of the 2010 SO₂ standard; and 2) areas that contain any stationary source that, according to the EPA's data, either emitted more than 16,000 tons of SO₂ in 2012 or emitted more than 2,600 tons of SO₂ and had an emission rate of at least 0.45 lbs/SO₂ per million British thermal unit in 2012 and, as of March 2, 2015, had not been announced for retirement. MidAmerican Energy's George Neal Unit 4 and the Ottumwa Generating Station (in which MidAmerican Energy has a majority ownership interest, but does not operate), are included as units subject to the first phase of the designations, having emitted more than 2,600 tons of SO₂ and having an emission rate of at least 0.45 lbs/SO₂ per million British thermal unit in 2012. States may submit to the EPA updated recommendations and supporting information for the EPA to consider in making its determinations. Iowa submitted documentation to the EPA in April 2016 supporting its recommendation that Des Moines, Wapello and Woodbury Counties be designated as being in attainment of the standard. In July 2016, the EPA's final designations were published in the Federal Register indicating portions of Muscatine County, Iowa were in nonattainment with the 2010 SO₂ standard, Woodbury County, Iowa was unclassifiable, and Des Moines and Wapello Counties were unclassifiable/attainment. On March 26, 2021, the EPA issued the last of its final designations for the 2010 primary SO₂ standard. Included in this round was designation of Converse County, Wyoming as an Attainment/Unclassifiable area. PacifiCorp's Dave Johnston generating facility is located in Converse County. No further action by PacifiCorp is required.

Cross-State Air Pollution Rule

The EPA promulgated an initial rule in March 2005 to reduce emissions of NO_x and SO₂, precursors of ozone and particulate matter, from down-wind sources in the eastern United States, including Iowa, to reduce emissions by implementing a plan based on a market-based cap-and-trade system, emissions reductions, or both. After numerous appeals, the CSAPR was promulgated to address interstate transport of SO₂ and NO_x emissions in 27 eastern and Midwestern states.

The first phase of the rule was implemented January 1, 2015. In November 2015, the EPA released a proposed rule that would further reduce NO_x emissions in 2017. The final "CSAPR Update Rule" was published in the Federal Register in October 2016 and required additional reductions in NO_x emissions beginning in May 2017. On December 6, 2018, EPA finalized a rule to close out the CSAPR, having determined that the CSAPR Update for the 2008 ozone NAAQS fully addressed Clean Air Act interstate transport obligations of 20 eastern states. EPA determined that 2023 is an appropriate future analytic year to evaluate remaining good neighbor obligations and that there will be no remaining nonattainment or maintenance receptors with respect to the 2008 ozone NAAQS in the eastern United States in that year. Accordingly, the 20 CSAPR Update-affected states would not contribute significantly to nonattainment in, or interfere with maintenance of, any other state with regard to the 2008 ozone NAAQS. Both the CSAPR Update and the CSAPR Close-Out rules were challenged in the D.C. Circuit. The D.C. Circuit ruled September 13, 2019, that because the EPA allowed upwind States to continue to significantly contribute to downwind air quality problems beyond statutory deadlines, the CSAPR Update Rule provided only a partial remedy that did not fully address interstate ozone transport, and remanded the CSAPR Update Rule back to the EPA. The D.C. Circuit issued an opinion October 1, 2019, finding that because the CSAPR Close-Out Rule relied on the same faulty reasoning as the CSAPR Update rule, the CSAPR Close-Out Rule must be vacated. On October 15, 2020, the EPA proposed to tighten caps on emissions of NO_x from power plants in 12 states in the CSAPR trading program in response to the D.C. Circuit's decision to vacate the CSAPR Update rule. The rule is intended to fully resolve 21 upwind states' remaining good neighbor obligations under the 2008 ozone NAAQS. Additional emissions reductions are required at power plants in 12 states, including Illinois; the EPA predicts that emissions from the remaining nine states, including Iowa and Texas, will not significantly contribute to downwind states' ability to attain or maintain the ozone standard. The EPA accepted comment on the proposal through December 15, 2020. On March 15, 2021, the EPA finalized the Revised CSAPR Update largely as proposed. Significant new compliance obligations are not anticipated as a result of the rule.

Regional Haze

The EPA's Regional Haze Rule, finalized in 1999, requires states to develop and implement plans to improve visibility in designated federally protected areas ("Class I areas"). Some of PacifiCorp's coal-fueled generating facilities in Utah, Wyoming, Arizona and Colorado and certain of Nevada Power's and Sierra Pacific's fossil-fueled generating facilities are subject to the Clean Air Visibility Rules. In accordance with the federal requirements, states are required to submit SIPs that address emissions from sources subject to BART requirements and demonstrate progress towards achieving natural visibility requirements in Class I areas by 2064.

The state of Utah issued a regional haze SIP requiring the installation of SO₂, NO_x and particulate matter controls on Hunter Units 1 and 2, and Huntington Units 1 and 2. In December 2012, the EPA approved the SO₂ portion of the Utah regional haze SIP and disapproved the NO_x and particulate matter portions. Subsequently, the Utah Division of Air Quality completed an alternative BART analysis for Hunter Units 1 and 2, and Huntington Units 1 and 2. In January 2016, the EPA published two alternative proposals to either approve the Utah SIP as written or reject the Utah SIP relating to NO_x controls and require the installation of SCR controls at Hunter Units 1 and 2 and Huntington Units 1 and 2 within five years. EPA's final action on the Utah regional haze SIP was effective August 4, 2016. The EPA approved in part and disapproved in part the Utah regional haze SIP and issued a federal implementation plan ("FIP") requiring the installation of SCR controls at Hunter Units 1 and 2 and Huntington Units 1 and 2 within five years of the effective date of the rule. PacifiCorp and other parties filed requests with the EPA to reconsider and stay that decision, as well as filed motions for stay and petitions for review with the Tenth Circuit Court of Appeals ("Tenth Circuit") asking the court to overturn the EPA's actions. In July 2017, the EPA issued a letter indicating it would reconsider its FIP decision. In light of the EPA's grant of reconsideration and the EPA's position in the litigation, the Tenth Circuit held the litigation in abeyance and imposed a stay of the compliance obligations of the FIP for the number of days the stay is in effect while the EPA conducts its reconsideration process. To support the reconsideration, PacifiCorp undertook additional air quality modeling using the Comprehensive Air Quality Model with Extensions dispersion model. On January 14, 2019, the state of Utah submitted a SIP revision to the EPA, which includes the updated modeling information and additional analysis. On June 24, 2019, the Utah Air Quality Board unanimously voted to approve the Utah regional haze SIP revision, which incorporates a BART alternative into Utah's regional haze SIP. The BART alternative makes the shutdown of PacifiCorp's Carbon plant enforceable under the SIP and removes the requirement to install SCR technology on Hunter Units 1 and 2 and Huntington Units 1 and 2. The Utah Division of Air Quality submitted the SIP revision to the EPA for approval at the end of 2019. In January 2020, the EPA published its proposed approval of the Utah Regional Haze SIP Alternative, which makes the shutdown of the Carbon plant federally enforceable and adopts as BART the existing NO_x controls and emission limits on the Hunter and Huntington plants. The proposed approval withdraws the FIP requirements to install SCR on Hunter Units 1 and 2 and Huntington Units 1 and 2. The EPA released the final rule approving the Utah Regional Haze SIP Alternative on October 28, 2020. With the approval, the EPA also finalized its withdrawal of the FIP requirements for the Hunter and Huntington plants. The Utah Regional Haze SIP Alternative took effect December 28, 2020. As a result of these actions, the Tenth Circuit dismissed the Utah regional haze petitions on January 11, 2021. On January 19, 2021, Heal Utah, National Parks Conservation Association, Sierra Club and Utah Physicians for a Healthy Environment filed a petition for review of the Utah Regional Haze SIP Alternative in the Tenth Circuit. PacifiCorp and the state of Utah moved to intervene in the litigation, which has been stayed pending the Biden administration's review of the rule.

Critical Accounting Estimates

Certain accounting measurements require management to make estimates and judgments concerning transactions that will be settled several years in the future. Amounts recognized on the Consolidated Financial Statements based on such estimates involve numerous assumptions subject to varying and potentially significant degrees of judgment and uncertainty and will likely change in the future as additional information becomes available. Estimates are used for, but not limited to, the accounting for the effects of certain types of regulation, derivatives, impairment of goodwill and long-lived assets, pension and other postretirement benefits, income taxes and revenue recognition - unbilled revenue. For additional discussion of the Company's critical accounting estimates, see Item 7 of the Company's Annual Report on Form 10-K for the year ended December 31, 2020. There have been no significant changes in the Company's assumptions regarding critical accounting estimates since December 31, 2020.

PacifiCorp and its subsidiaries
Consolidated Financial Section

PART I

Item 1. Financial Statements

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors and Shareholders of
PacifiCorp

Results of Review of Interim Financial Information

We have reviewed the accompanying consolidated balance sheet of PacifiCorp and subsidiaries ("PacifiCorp") as of March 31, 2021, the related consolidated statements of operations, changes in shareholders' equity and cash flows for the three-month periods ended March 31, 2021 and 2020, and the related notes (collectively referred to as the "interim financial information"). Based on our reviews, we are not aware of any material modifications that should be made to the accompanying interim financial information for it to be in conformity with accounting principles generally accepted in the United States of America.

We have previously audited, in accordance with the standards of the Public Company Accounting Oversight Board (United States) (PCAOB), the consolidated balance sheet of PacifiCorp as of December 31, 2020, and the related consolidated statements of operations, comprehensive income, changes in shareholders' equity, and cash flows for the year then ended (not presented herein); and in our report dated February 26, 2021, we expressed an unqualified opinion on those consolidated financial statements. In our opinion, the information set forth in the accompanying consolidated balance sheet as of December 31, 2020, is fairly stated, in all material respects, in relation to the consolidated balance sheet from which it has been derived.

Basis for Review Results

This interim financial information is the responsibility of PacifiCorp's management. We are a public accounting firm registered with the PCAOB and are required to be independent with respect to PacifiCorp in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our reviews in accordance with standards of the PCAOB. A review of interim financial information consists principally of applying analytical procedures and making inquiries of persons responsible for financial and accounting matters. It is substantially less in scope than an audit conducted in accordance with the standards of the PCAOB, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, we do not express such an opinion.

/s/ Deloitte & Touche LLP

Portland, Oregon
April 30, 2021

PACIFICORP AND SUBSIDIARIES
CONSOLIDATED BALANCE SHEETS (Unaudited)
(Amounts in millions)

	As of	
	March 31, 2021	December 31, 2020
ASSETS		
Current assets:		
Cash and cash equivalents	\$ 43	\$ 13
Trade receivables, net	650	703
Other receivables, net	48	48
Inventories	475	482
Regulatory assets	107	116
Prepaid expenses	73	79
Other current assets	109	82
Total current assets	1,505	1,523
Property, plant and equipment, net	22,535	22,430
Regulatory assets	1,279	1,279
Other assets	479	470
Total assets	\$ 25,798	\$ 25,702

The accompanying notes are an integral part of these consolidated financial statements.

PACIFICORP AND SUBSIDIARIES
CONSOLIDATED BALANCE SHEETS (Unaudited) (continued)
(Amounts in millions)

	As of	
	March 31, 2021	December 31, 2020
LIABILITIES AND SHAREHOLDERS' EQUITY		
Current liabilities:		
Accounts payable	\$ 615	\$ 772
Accrued interest	114	127
Accrued property, income and other taxes	118	80
Accrued employee expenses	112	84
Short-term debt	95	93
Current portion of long-term debt	879	420
Regulatory liabilities	111	115
Other current liabilities	178	174
Total current liabilities	2,222	1,865
Long-term debt	7,734	8,192
Regulatory liabilities	2,728	2,727
Deferred income taxes	2,666	2,627
Other long-term liabilities	1,106	1,118
Total liabilities	16,456	16,529
Commitments and contingencies (Note 8)		
Shareholders' equity:		
Preferred stock	2	2
Common stock - 750 shares authorized, no par value, 357 shares issued and outstanding	—	—
Additional paid-in capital	4,479	4,479
Retained earnings	4,880	4,711
Accumulated other comprehensive loss, net	(19)	(19)
Total shareholders' equity	9,342	9,173
Total liabilities and shareholders' equity	\$ 25,798	\$ 25,702

The accompanying notes are an integral part of these consolidated financial statements.

PACIFICORP AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF OPERATIONS (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Operating revenue	\$ 1,242	\$ 1,206
Operating expenses:		
Cost of fuel and energy	424	417
Operations and maintenance	259	254
Depreciation and amortization	264	252
Property and other taxes	61	49
Total operating expenses	1,008	972
Operating income	234	234
Other income (expense):		
Interest expense	(107)	(102)
Allowance for borrowed funds	6	10
Allowance for equity funds	13	21
Interest and dividend income	6	3
Other, net	6	(4)
Total other income (expense)	(76)	(72)
Income before income tax benefit	158	162
Income tax benefit	(11)	(14)
Net income	\$ 169	\$ 176

The accompanying notes are an integral part of these consolidated financial statements.

PACIFICORP AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CHANGES IN SHAREHOLDERS' EQUITY (Unaudited)
(Amounts in millions)

	<u>Preferred Stock</u>	<u>Common Stock</u>	<u>Additional Paid-in Capital</u>	<u>Retained Earnings</u>	<u>Accumulated Other Comprehensive Loss, Net</u>	<u>Total Shareholders' Equity</u>
Balance, December 31, 2019	\$ 2	\$ —	\$ 4,479	\$ 3,972	\$ (16)	\$ 8,437
Net income	—	—	—	176	—	176
Other comprehensive income	—	—	—	—	1	1
Balance, March 31, 2020	<u>\$ 2</u>	<u>\$ —</u>	<u>\$ 4,479</u>	<u>\$ 4,148</u>	<u>\$ (15)</u>	<u>\$ 8,614</u>
Balance, December 31, 2020	\$ 2	\$ —	\$ 4,479	\$ 4,711	\$ (19)	\$ 9,173
Net income	—	—	—	169	—	169
Balance, March 31, 2021	<u>\$ 2</u>	<u>\$ —</u>	<u>\$ 4,479</u>	<u>\$ 4,880</u>	<u>\$ (19)</u>	<u>\$ 9,342</u>

The accompanying notes are an integral part of these consolidated financial statements.

PACIFICORP AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CASH FLOWS (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Cash flows from operating activities:		
Net income	\$ 169	\$ 176
Adjustments to reconcile net income to net cash flows from operating activities:		
Depreciation and amortization	264	252
Allowance for equity funds	(13)	(21)
Changes in regulatory assets and liabilities	(4)	(16)
Deferred income taxes and amortization of investment tax credits	13	(30)
Other, net	(2)	6
Changes in other operating assets and liabilities:		
Trade receivables, other receivables and other assets	61	85
Inventories	7	(26)
Derivative collateral, net	7	(1)
Prepaid expenses	6	(3)
Accrued property, income and other taxes, net	12	18
Accounts payable and other liabilities	(51)	(3)
Net cash flows from operating activities	<u>469</u>	<u>437</u>
Cash flows from investing activities:		
Capital expenditures	(439)	(366)
Other, net	(1)	27
Net cash flows from investing activities	<u>(440)</u>	<u>(339)</u>
Cash flows from financing activities:		
Net proceeds from (repayments of) short-term debt	2	(74)
Other, net	(1)	—
Net cash flows from financing activities	<u>1</u>	<u>(74)</u>
Net change in cash and cash equivalents and restricted cash and cash equivalents	30	24
Cash and cash equivalents and restricted cash and cash equivalents at beginning of period	19	36
Cash and cash equivalents and restricted cash and cash equivalents at end of period	<u>\$ 49</u>	<u>\$ 60</u>

The accompanying notes are an integral part of these consolidated financial statements.

PACIFICORP AND SUBSIDIARIES
NOTES TO CONSOLIDATED FINANCIAL STATEMENTS
(Unaudited)

(1) General

PacifiCorp, which includes PacifiCorp and its subsidiaries, is a United States regulated electric utility company serving retail customers, including residential, commercial, industrial, irrigation and other customers in portions of Utah, Oregon, Wyoming, Washington, Idaho and California. PacifiCorp owns, or has interests in, a number of thermal, hydroelectric, wind-powered and geothermal generating facilities, as well as electric transmission and distribution assets. PacifiCorp also buys and sells electricity on the wholesale market with other utilities, energy marketing companies, financial institutions and other market participants. PacifiCorp is subject to comprehensive state and federal regulation. PacifiCorp's subsidiaries support its electric utility operations by providing coal mining services. PacifiCorp is an indirect subsidiary of Berkshire Hathaway Energy Company ("BHE"), a holding company based in Des Moines, Iowa that owns subsidiaries principally engaged in energy businesses. BHE is a consolidated subsidiary of Berkshire Hathaway Inc. ("Berkshire Hathaway").

The unaudited Consolidated Financial Statements have been prepared in accordance with accounting principles generally accepted in the United States of America ("GAAP") for interim financial information and the United States Securities and Exchange Commission's rules and regulations for Form 10-Q and Article 10 of Regulation S-X. Accordingly, they do not include all of the disclosures required by GAAP for annual financial statements. Management believes the unaudited Consolidated Financial Statements contain all adjustments (consisting only of normal recurring adjustments) considered necessary for the fair presentation of the unaudited Consolidated Financial Statements as of March 31, 2021 and for the three-month periods ended March 31, 2021 and 2020. The Consolidated Statements of Comprehensive Income have been omitted as net income materially equals comprehensive income for the three-month periods ended March 31, 2021 and 2020. The results of operations for the three-month periods ended March 31, 2021 and 2020 are not necessarily indicative of the results to be expected for the full year.

The preparation of the unaudited Consolidated Financial Statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the unaudited Consolidated Financial Statements and the reported amounts of revenue and expenses during the period. Actual results may differ from the estimates used in preparing the unaudited Consolidated Financial Statements. Note 2 of Notes to Consolidated Financial Statements included in PacifiCorp's Annual Report on Form 10-K for the year ended December 31, 2020 describes the most significant accounting policies used in the preparation of the unaudited Consolidated Financial Statements. There have been no significant changes in PacifiCorp's assumptions regarding significant accounting estimates and policies during the three-month period ended March 31, 2021.

(2) Cash and Cash Equivalents and Restricted Cash and Cash Equivalents

Cash equivalents consist of funds invested in money market mutual funds, United States Treasury Bills and other investments with a maturity of three months or less when purchased. Cash and cash equivalents exclude amounts where availability is restricted by legal requirements, loan agreements or other contractual provisions. Restricted cash and cash equivalents consist substantially of funds representing vendor retention, custodial and nuclear decommissioning funds. Restricted amounts are included in other current assets and other assets on the Consolidated Balance Sheets. A reconciliation of cash and cash equivalents and restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, as presented in the Consolidated Statements of Cash Flows is outlined below and disaggregated by the line items in which they appear on the Consolidated Balance Sheets (in millions):

	As of	
	March 31, 2021	December 31, 2020
Cash and cash equivalents	\$ 43	\$ 13
Restricted cash included in other current assets	3	4
Restricted cash included in other assets	3	2
Total cash and cash equivalents and restricted cash and cash equivalents	<u>\$ 49</u>	<u>\$ 19</u>

(3) Property, Plant and Equipment, Net

Property, plant and equipment, net consists of the following (in millions):

		As of	
	Depreciable Life	March 31, 2021	December 31, 2020
Utility Plant:			
Generation	15 - 59 years	\$ 13,355	\$ 12,861
Transmission	60 - 90 years	7,686	7,632
Distribution	20 - 75 years	7,725	7,660
Intangible plant ⁽¹⁾	5 - 75 years	1,069	1,054
Other	5 - 60 years	1,513	1,510
Utility plant in service		31,348	30,717
Accumulated depreciation and amortization		(9,980)	(9,838)
Utility plant in service, net		21,368	20,879
Other non-regulated, net of accumulated depreciation and amortization	14 - 95 years	9	9
Plant, net		21,377	20,888
Construction work-in-progress		1,158	1,542
Property, plant and equipment, net		\$ 22,535	\$ 22,430

(1) Computer software costs included in intangible plant are initially assigned a depreciable life of 5 to 10 years.

Effective January 1, 2021, PacifiCorp revised its depreciation rates based on its recent depreciation study that was approved by its state regulatory commissions, other than in California. The approved depreciation rates resulted in an increase in depreciation expense of approximately \$37 million for the three-month period ended March 31, 2021 compared to the three-month period ended March 31, 2020 based on historical property, plant and equipment balances and including depreciation of certain coal-fueled generating units in Washington over accelerated periods.

(4) Income Taxes

A reconciliation of the federal statutory income tax rate to the effective income tax rate applicable to income before income tax expense is as follows:

	Three-Month Periods Ended March 31,	
	2021	2020
Federal statutory income tax rate	21 %	21 %
State income tax, net of federal income tax benefit	3	3
Federal income tax credits	(20)	(11)
Effects of ratemaking	(13)	(22)
Other	2	—
Effective income tax rate	<u>(7)%</u>	<u>(9)%</u>

Income tax credits relate primarily to production tax credits ("PTCs") earned by PacifiCorp's wind-powered generating facilities. Federal renewable electricity PTCs are earned as energy from qualifying wind-powered generating facilities is produced and sold and are based on a per-kilowatt hour rate pursuant to the applicable federal income tax law. Wind-powered generating facilities are eligible for the credits for 10 years from the date the qualifying generating facilities are placed in-service.

Effects of ratemaking for the three-month periods ended March 31, 2021 and 2020 is primarily attributable to the amortization of excess deferred income taxes, including the use of excess deferred income taxes of \$3 million and \$30 million, respectively, to accelerate depreciation of certain retired wind equipment and to amortize certain regulatory asset balances in accordance with regulatory orders issued in Oregon and Wyoming.

Berkshire Hathaway includes BHE and its subsidiaries in its United States federal income tax return. Consistent with established regulatory practice, PacifiCorp's provision for federal and state income tax has been computed on a stand-alone basis, and substantially all of its currently payable or receivable income tax is remitted to or received from BHE. For the three-month periods ended March 31, 2021 and 2020, PacifiCorp made net cash payments for federal and state income tax to BHE totaling \$1 million and \$26 million, respectively.

(5) Employee Benefit Plans

Net periodic benefit credit for the pension and other postretirement benefit plans included the following components (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Pension:		
Service cost	\$ —	\$ —
Interest cost	7	9
Expected return on plan assets	(13)	(14)
Net amortization	5	5
Net periodic benefit credit	<u>\$ (1)</u>	<u>\$ —</u>
Other postretirement:		
Service cost	\$ —	\$ —
Interest cost	2	3
Expected return on plan assets	(2)	(4)
Net amortization	—	—
Net periodic benefit credit	<u>\$ —</u>	<u>\$ (1)</u>

Amounts other than the service cost for pension and other postretirement benefit plans are recorded in Other, net in the Consolidated Statements of Operations. Employer contributions to the pension and other postretirement benefit plans are expected to be \$4 million and \$1 million, respectively, during 2021. As of March 31, 2021, \$1 million of contributions had been made to the pension plans.

(6) Risk Management and Hedging Activities

PacifiCorp is exposed to the impact of market fluctuations in commodity prices and interest rates. PacifiCorp is principally exposed to electricity, natural gas, coal and fuel oil commodity price risk as it has an obligation to serve retail customer load in its service territories. PacifiCorp's load and generating facilities represent substantial underlying commodity positions. Exposures to commodity prices consist mainly of variations in the price of fuel required to generate electricity and wholesale electricity that is purchased and sold. Commodity prices are subject to wide price swings as supply and demand are impacted by, among many other unpredictable items, weather, market liquidity, generating facility availability, customer usage, storage, and transmission and transportation constraints. Interest rate risk exists on variable-rate debt and future debt issuances. PacifiCorp does not engage in a material amount of proprietary trading activities.

PacifiCorp has established a risk management process that is designed to identify, manage and report each of the various types of risk involved in its business. To mitigate a portion of its commodity price risk, PacifiCorp uses commodity derivative contracts, which may include forwards, options, swaps and other agreements, to effectively secure future supply or sell future production generally at fixed prices. PacifiCorp manages its interest rate risk by limiting its exposure to variable interest rates primarily through the issuance of fixed-rate long-term debt and by monitoring market changes in interest rates. Additionally, PacifiCorp may from time to time enter into interest rate derivative contracts, such as interest rate swaps or locks, to mitigate PacifiCorp's exposure to interest rate risk. No interest rate derivatives were in place during the periods presented. PacifiCorp does not hedge all of its commodity price and interest rate risks, thereby exposing the unhedged portion to changes in market prices.

There have been no significant changes in PacifiCorp's accounting policies related to derivatives. Refer to Note 7 for additional information on derivative contracts.

The following table, which reflects master netting arrangements and excludes contracts that have been designated as normal under the normal purchases or normal sales exception afforded by GAAP, summarizes the fair value of PacifiCorp's derivative contracts, on a gross basis, and reconciles those amounts to the amounts presented on a net basis on the Consolidated Balance Sheets (in millions):

	Other Current Assets	Other Assets	Other Current Liabilities	Other Long-term Liabilities	Total
As of March 31, 2021					
Not designated as hedging contracts⁽¹⁾:					
Commodity assets	\$ 45	\$ 6	\$ 2	\$ —	\$ 53
Commodity liabilities	(2)	—	(27)	(24)	(53)
Total	43	6	(25)	(24)	—
Total derivatives	43	6	(25)	(24)	—
Cash collateral receivable	—	—	13	4	17
Total derivatives - net basis	\$ 43	\$ 6	\$ (12)	\$ (20)	\$ 17
As of December 31, 2020					
Not designated as hedging contracts⁽¹⁾:					
Commodity assets	\$ 29	\$ 6	\$ 1	\$ —	\$ 36
Commodity liabilities	(2)	—	(23)	(28)	(53)
Total	27	6	(22)	(28)	(17)
Total derivatives	27	6	(22)	(28)	(17)
Cash collateral receivable	—	—	15	9	24
Total derivatives - net basis	\$ 27	\$ 6	\$ (7)	\$ (19)	\$ 7

- (1) PacifiCorp's commodity derivatives are generally included in rates and as of March 31, 2021 and December 31, 2020, a regulatory asset of \$— million and \$17 million, respectively, was recorded related to the net derivative liability of \$— million and \$17 million, respectively.

The following table reconciles the beginning and ending balances of PacifiCorp's net regulatory assets and summarizes the pre-tax gains and losses on commodity derivative contracts recognized in net regulatory assets, as well as amounts reclassified to earnings (in millions):

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Beginning balance	\$ 17	\$ 62
Changes in fair value	(17)	34
Net gains reclassified to operating revenue	—	8
Net losses reclassified to cost of fuel and energy	—	(20)
Ending balance	<u>\$ —</u>	<u>\$ 84</u>

Derivative Contract Volumes

The following table summarizes the net notional amounts of outstanding commodity derivative contracts with fixed price terms that comprise the mark-to-market values as of (in millions):

	Unit of Measure	March 31, 2021	December 31, 2020
Electricity sales, net	Megawatt hours	—	(1)
Natural gas purchases	Decatherms	114	100

Credit Risk

PacifiCorp is exposed to counterparty credit risk associated with wholesale energy supply and marketing activities with other utilities, energy marketing companies, financial institutions and other market participants. Credit risk may be concentrated to the extent PacifiCorp's counterparties have similar economic, industry or other characteristics and due to direct or indirect relationships among the counterparties. Before entering into a transaction, PacifiCorp analyzes the financial condition of each significant wholesale counterparty, establishes limits on the amount of unsecured credit to be extended to each counterparty and evaluates the appropriateness of unsecured credit limits on an ongoing basis. To further mitigate wholesale counterparty credit risk, PacifiCorp enters into netting and collateral arrangements that may include margining and cross-product netting agreements and obtains third-party guarantees, letters of credit and cash deposits. If required, PacifiCorp exercises rights under these arrangements, including calling on the counterparty's credit support arrangement.

Collateral and Contingent Features

In accordance with industry practice, certain wholesale agreements, including derivative contracts, contain credit support provisions that in part base certain collateral requirements on credit ratings for senior unsecured debt as reported by one or more of the recognized credit rating agencies. These agreements may either specifically provide bilateral rights to demand cash or other security if credit exposures on a net basis exceed specified rating-dependent threshold levels ("credit-risk-related contingent features") or provide the right for counterparties to demand "adequate assurance" if there is a material adverse change in PacifiCorp's creditworthiness. These rights can vary by contract and by counterparty. As of March 31, 2021, PacifiCorp's credit ratings for its senior secured debt and its issuer credit ratings for senior unsecured debt from the recognized credit rating agencies were investment grade.

The aggregate fair value of PacifiCorp's derivative contracts in liability positions with specific credit-risk-related contingent features totaled \$52 million and \$51 million as of March 31, 2021 and December 31, 2020, respectively, for which PacifiCorp had posted collateral of \$17 million and \$24 million, respectively, in the form of cash deposits. If all credit-risk-related contingent features for derivative contracts in liability positions had been triggered as of March 31, 2021 and December 31, 2020, PacifiCorp would have been required to post \$30 million and \$25 million, respectively, of additional collateral. PacifiCorp's collateral requirements could fluctuate considerably due to market price volatility, changes in credit ratings, changes in legislation or regulation or other factors.

(7) Fair Value Measurements

The carrying value of PacifiCorp's cash, certain cash equivalents, receivables, payables, accrued liabilities and short-term borrowings approximates fair value because of the short-term maturity of these instruments. PacifiCorp has various financial assets and liabilities that are measured at fair value on the Consolidated Financial Statements using inputs from the three levels of the fair value hierarchy. A financial asset or liability classification within the hierarchy is determined based on the lowest level input that is significant to the fair value measurement. The three levels are as follows:

- Level 1 — Inputs are unadjusted quoted prices in active markets for identical assets or liabilities that PacifiCorp has the ability to access at the measurement date.
- Level 2 — Inputs include quoted prices for similar assets or liabilities in active markets, quoted prices for identical or similar assets or liabilities in markets that are not active, inputs other than quoted prices that are observable for the asset or liability and inputs that are derived principally from or corroborated by observable market data by correlation or other means (market corroborated inputs).
- Level 3 — Unobservable inputs reflect PacifiCorp's judgments about the assumptions market participants would use in pricing the asset or liability since limited market data exists. PacifiCorp develops these inputs based on the best information available, including its own data.

The following table presents PacifiCorp's assets and liabilities recognized on the Consolidated Balance Sheets and measured at fair value on a recurring basis (in millions):

	Input Levels for Fair Value Measurements				
	Level 1	Level 2	Level 3	Other ⁽¹⁾	Total
<u>As of March 31, 2021</u>					
Assets:					
Commodity derivatives	\$ —	\$ 53	\$ —	\$ (4)	\$ 49
Money market mutual funds ⁽²⁾	36	—	—	—	36
Investment funds	30	—	—	—	30
	<u>\$ 66</u>	<u>\$ 53</u>	<u>\$ —</u>	<u>\$ (4)</u>	<u>\$ 115</u>
Liabilities - Commodity derivatives	<u>\$ —</u>	<u>\$ (53)</u>	<u>\$ —</u>	<u>\$ 21</u>	<u>\$ (32)</u>
<u>As of December 31, 2020</u>					
Assets:					
Commodity derivatives	\$ —	\$ 36	\$ —	\$ (3)	\$ 33
Money market mutual funds ⁽²⁾	6	—	—	—	6
Investment funds	25	—	—	—	25
	<u>\$ 31</u>	<u>\$ 36</u>	<u>\$ —</u>	<u>\$ (3)</u>	<u>\$ 64</u>
Liabilities - Commodity derivatives	<u>\$ —</u>	<u>\$ (53)</u>	<u>\$ —</u>	<u>\$ 27</u>	<u>\$ (26)</u>

(1) Represents netting under master netting arrangements and a net cash collateral receivable of \$17 million and \$24 million as of March 31, 2021 and December 31, 2020, respectively.

(2) Amounts are included in cash and cash equivalents, other current assets and other assets on the Consolidated Balance Sheets. The fair value of these money market mutual funds approximates cost.

Derivative contracts are recorded on the Consolidated Balance Sheets as either assets or liabilities and are stated at estimated fair value unless they are designated as normal purchases or normal sales and qualify for the exception afforded by GAAP. When available, the fair value of derivative contracts is estimated using unadjusted quoted prices for identical contracts in the market in which PacifiCorp transacts. When quoted prices for identical contracts are not available, PacifiCorp uses forward price curves. Forward price curves represent PacifiCorp's estimates of the prices at which a buyer or seller could contract today for delivery or settlement at future dates. PacifiCorp bases its forward price curves upon market price quotations, when available, or internally developed and commercial models, with internal and external fundamental data inputs. Market price quotations are obtained from independent energy brokers, exchanges, direct communication with market participants and actual transactions executed by PacifiCorp. Market price quotations for certain major electricity and natural gas trading hubs are generally readily obtainable for the first three years; therefore, PacifiCorp's forward price curves for those locations and periods reflect observable market quotes. Market price quotations for other electricity and natural gas trading hubs are not as readily obtainable for the first three years. Given that limited market data exists for these contracts, as well as for those contracts that are not actively traded, PacifiCorp uses forward price curves derived from internal models based on perceived pricing relationships to major trading hubs that are based on unobservable inputs. The estimated fair value of these derivative contracts is a function of underlying forward commodity prices, interest rates, currency rates, related volatility, counterparty creditworthiness and duration of contracts. Refer to Note 6 for further discussion regarding PacifiCorp's risk management and hedging activities.

PacifiCorp's investments in money market mutual funds and investment funds are stated at fair value. When available, PacifiCorp uses a readily observable quoted market price or net asset value of an identical security in an active market to record the fair value. In the absence of a quoted market price or net asset value of an identical security, the fair value is determined using pricing models or net asset values based on observable market inputs and quoted market prices of securities with similar characteristics.

PacifiCorp's long-term debt is carried at cost on the Consolidated Balance Sheets. The fair value of PacifiCorp's long-term debt is a Level 2 fair value measurement and has been estimated based upon quoted market prices, where available, or at the present value of future cash flows discounted at rates consistent with comparable maturities with similar credit risks. The carrying value of PacifiCorp's variable-rate long-term debt approximates fair value because of the frequent repricing of these instruments at market rates. The following table presents the carrying value and estimated fair value of PacifiCorp's long-term debt (in millions):

	As of March 31, 2021		As of December 31, 2020	
	Carrying Value	Fair Value	Carrying Value	Fair Value
Long-term debt	\$ 8,613	\$ 10,198	\$ 8,612	\$ 10,995

(8) Commitments and Contingencies

Legal Matters

PacifiCorp is party to a variety of legal actions arising out of the normal course of business. Plaintiffs occasionally seek punitive or exemplary damages. PacifiCorp does not believe that such normal and routine litigation will have a material impact on its consolidated financial results. PacifiCorp is also involved in other kinds of legal actions, some of which assert or may assert claims or seek to impose fines, penalties and other costs in substantial amounts and are described below.

California and Oregon 2020 Wildfires

In September 2020, a severe weather event resulting in high winds, low humidity and warm temperatures contributed to several major wildfires, private and public property damage, personal injuries and loss of life and widespread power outages in Oregon and Northern California. The wildfires spread across certain parts of PacifiCorp's service territory and surrounding areas across multiple counties in Oregon and California, including Siskiyou County, California; Jackson County, Oregon; Douglas County, Oregon; Marion County, Oregon; Lincoln County, Oregon; and Klamath County, Oregon burning over 500,000 acres in aggregate. Third party reports for these wildfires indicate over 2,000 structures, including residences, destroyed; several structures damaged; multiple individuals injured; and several fatalities. Fire suppression costs estimated by various agencies total approximately \$150 million. Investigations into the cause and origin of each wildfire are complex and ongoing and being conducted by various entities, including the United States Forest Service, the California Public Utilities Commission, the Oregon Department of Forestry, the Oregon Department of Justice, PacifiCorp and various experts engaged by PacifiCorp.

Several lawsuits have been filed in Oregon and California, including a putative class action complaint in Oregon, on behalf of citizens and businesses who suffered damages from fires allegedly caused by PacifiCorp. The final determinations of liability, however, will only be made following comprehensive investigations and litigation processes.

In California, under inverse condemnation, courts have held that investor-owned utilities can be liable for real and personal property damages without the utility being found negligent and regardless of fault. California law also permits inverse condemnation plaintiffs to recover reasonable attorney fees and costs. In both Oregon and California, PacifiCorp has equipment in areas accessed through special use permits, easements or similar agreements that may contain provisions requiring it to pay for damages caused by its equipment regardless of fault. Even if inverse condemnation or other provisions do not apply, PacifiCorp could nevertheless be found liable for all damages proximately caused by negligence, including property and natural resource damage; fire suppression costs; personal injury and loss of life damages; and interest.

As of March 31, 2021, PacifiCorp has accrued \$136 million as its best estimate of the potential losses net of expected insurance recoveries associated with the 2020 Wildfires that are considered probable of being incurred. These accruals include estimated losses for fire suppression costs, property damage, personal injury damages and loss of life damages. It is reasonably possible that PacifiCorp will incur additional losses beyond the amounts accrued; however, PacifiCorp is currently unable to estimate the range of possible additional losses that could be incurred due to the number of properties and parties involved and the lack of specific claims for all potential claimants. To the extent losses beyond the amounts accrued are incurred, additional insurance coverage is expected to be available to cover at least a portion of the losses.

Environmental Laws and Regulations

PacifiCorp is subject to federal, state and local laws and regulations regarding air and water quality, renewable portfolio standards, emissions performance standards, climate change, coal combustion byproduct disposal, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact PacifiCorp's current and future operations. PacifiCorp believes it is in material compliance with all applicable laws and regulations.

Hydroelectric Relicensing

PacifiCorp is a party to the 2016 amended Klamath Hydroelectric Settlement Agreement ("KHSA"), which is intended to resolve disputes surrounding PacifiCorp's efforts to relicense the Klamath Hydroelectric Project. The KHSA establishes a process for PacifiCorp, the states of Oregon and California ("States") and other stakeholders to assess whether dam removal can occur consistent with the settlement's terms. For PacifiCorp, the key elements of the settlement include: (1) a contribution from PacifiCorp's Oregon and California customers capped at \$200 million plus \$250 million in California bond funds; (2) complete indemnification from harms associated with dam removal; (3) transfer of the Federal Energy Regulatory Commission ("FERC") license to a third-party dam removal entity, the Klamath River Renewal Corporation ("KRRC"), who would conduct dam removal; and (4) ability for PacifiCorp to operate the facilities for the benefit of customers until dam removal commences.

In September 2016, the KRRC and PacifiCorp filed a joint application with the FERC to transfer the license for the four mainstem Klamath dams from PacifiCorp to the KRRC. The FERC approved partial transfer of the Klamath license in a July 2020 order, subject to the condition that PacifiCorp remains co-licensee. Under the amended KHSA, PacifiCorp did not agree to remain co-licensee during the surrender and removal process given concerns about liability protections for PacifiCorp and its customers. In November 2020, PacifiCorp entered a memorandum of agreement (the "MOA") with the KRRC, the Karuk Tribe, the Yurok Tribe and the States to continue implementation of the KHSA. The agreement required the States, PacifiCorp and KRRC to file a new license transfer application by January 16, 2021 to remove PacifiCorp from the license for the Klamath Hydroelectric Project and add the States and KRRC as co-licensees for the purposes of surrender. On January 13, 2021, the new license transfer application was filed with the FERC, notifying it that PacifiCorp and the KRRC are not accepting co-licensee status under FERC's July 2020 order, and instead are seeking the license transfer outcome described in the new license transfer application. In addition, the MOA provides for additional contingency funding of \$45 million, equally split between PacifiCorp and the States, and for PacifiCorp and the States to equally share in any additional cost overruns in the unlikely event that dam removal costs exceed the \$450 million in funding to ensure dam removal is complete. The MOA also requires PacifiCorp to cover the costs associated with certain pre-existing environmental conditions.

Guarantees

PacifiCorp has entered into guarantees as part of the normal course of business and the sale of certain assets. These guarantees are not expected to have a material impact on PacifiCorp's consolidated financial results.

(9) Revenue from Contracts with Customers

The following table summarizes PacifiCorp's revenue from contracts with customers ("Customer Revenue") by customer class (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Customer Revenue:		
Retail:		
Residential	\$ 483	\$ 460
Commercial	359	358
Industrial	271	277
Other retail	32	27
Total retail	1,145	1,122
Wholesale ⁽¹⁾	36	—
Transmission	25	22
Other Customer Revenue	23	26
Total Customer Revenue	1,229	1,170
Other revenue	13	36
Total operating revenue	\$ 1,242	\$ 1,206

(1) Includes net payments to counterparties for the financial settlement of certain non-derivative forward contracts for energy sales.

Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations

The following is management's discussion and analysis of certain significant factors that have affected the consolidated financial condition and results of operations of PacifiCorp during the periods included herein. Explanations include management's best estimate of the impact of weather, customer growth, usage trends and other factors. This discussion should be read in conjunction with PacifiCorp's historical unaudited Consolidated Financial Statements and Notes to Consolidated Financial Statements in Part I, Item 1 of this Form 10-Q. PacifiCorp's actual results in the future could differ significantly from the historical results.

Results of Operations for the First Quarter of 2021 and 2020

Overview

Net income for the first three months of 2021 was \$169 million, a decrease of \$7 million compared to 2020. Net income decreased primarily due to lower allowances for equity and borrowed funds used during construction of \$12 million, higher property taxes of \$12 million, higher depreciation and amortization expense of \$12 million, including the impacts of the depreciation study that was effective January 1, 2021, higher operations and maintenance expense of \$5 million and higher interest expense of \$5 million, partially offset by higher utility margin of \$29 million and increased cash surrender value of corporate-owned life insurance policies. Utility margin increased primarily due to higher retail and wholesale revenue and lower purchased electricity costs, partially offset by higher natural gas-fueled generation costs, higher net amortization of deferred net power costs in accordance with established adjustment mechanisms, and higher coal-fueled generation costs. Retail customer volumes increased 0.3%, primarily due to an increase in the average number of customers across the service territory and favorable impact of weather, partially offset by lower customer usage. Energy generated increased 8% for the first three months of 2021 compared to 2020 primarily due to higher wind-powered, coal-fueled and natural gas-fueled generation, partially offset by lower hydroelectric generation. Wholesale electricity sales volumes increased 24% and purchased electricity volumes decreased 11%.

Non-GAAP Financial Measure

Management utilizes various key financial measures that are prepared in accordance with GAAP, as well as non-GAAP financial measures such as utility margin, to help evaluate results of operations. Utility margin is calculated as operating revenue less cost of fuel and energy, which are captions presented on the Consolidated Statements of Operations.

PacifiCorp's cost of fuel and energy is generally recovered from its customers through regulatory recovery mechanisms and as a result, changes in PacifiCorp's revenue are comparable to changes in such expenses. As such, management believes utility margin more appropriately and concisely explains profitability rather than a discussion of revenue and cost of fuel and energy separately. Management believes the presentation of utility margin provides meaningful and valuable insight into the information management considers important to running the business and a measure of comparability to others in the industry.

Utility margin is not a measure calculated in accordance with GAAP and should be viewed as a supplement to and not a substitute for operating income which is the most comparable financial measure prepared in accordance with GAAP. The following table provides a reconciliation of utility margin to operating income (in millions):

	First Quarter			
	2021	2020	Change	
Utility margin:				
Operating revenue	\$ 1,242	\$ 1,206	\$ 36	3 %
Cost of fuel and energy	424	417	7	2
Utility margin	818	789	29	4
Operations and maintenance	259	254	5	2
Depreciation and amortization	264	252	12	5
Property and other taxes	61	49	12	24
Operating income	\$ 234	\$ 234	\$ —	— %

Utility Margin

A comparison of key operating results related to utility margin is as follows for the quarters ended March 31:

	First Quarter			
	2021	2020	Change	
Utility margin (in millions):				
Operating revenue	\$ 1,242	\$ 1,206	\$ 36	3 %
Cost of fuel and energy	424	417	7	2
Utility margin	<u>\$ 818</u>	<u>\$ 789</u>	<u>\$ 29</u>	4 %
Sales (GWhs):				
Residential	4,632	4,421	211	5 %
Commercial	4,470	4,410	60	1
Industrial, irrigation and other	4,474	4,702	(228)	(5)
Total retail	13,576	13,533	43	—
Wholesale	1,591	1,281	310	24
Total sales	<u>15,167</u>	<u>14,814</u>	<u>353</u>	2 %
Average number of retail customers (in thousands)	1,989	1,955	34	2 %
Average revenue per MWh:				
Retail	\$ 84.15	\$ 82.97	\$ 1.18	1 %
Wholesale	\$ 30.89	\$ 26.35	\$ 4.54	17 %
Heating degree days	4,687	4,605	82	2 %
Sources of energy (GWhs) ⁽¹⁾ :				
Coal	7,644	7,228	416	6 %
Natural gas	3,065	3,041	24	1
Hydroelectric ⁽²⁾	923	1,046	(123)	(12)
Wind and other ⁽²⁾	1,803	1,112	691	62
Total energy generated	13,435	12,427	1,008	8
Energy purchased	3,028	3,391	(363)	(11)
Total	<u>16,463</u>	<u>15,818</u>	<u>645</u>	4 %
Average cost of energy per MWh:				
Energy generated ⁽³⁾	\$ 17.66	\$ 17.80	\$ (0.14)	(1)%
Energy purchased	\$ 47.13	\$ 47.41	\$ (0.28)	(1)%

(1) GWh amounts are net of energy used by the related generating facilities.

(2) All or some of the renewable energy attributes associated with generation from these sources may be: (a) used in future years to comply with RPS or other regulatory requirements or (b) sold to third parties in the form of RECs or other environmental commodities.

(3) The average cost per MWh of energy generated includes only the cost of fuel associated with the generating facilities.

Quarter Ended March 31, 2021 Compared to Quarter Ended March 31, 2020

Utility margin increased \$29 million, or 4%, for the first quarter of 2021 compared to 2020 primarily due to:

- \$20 million increase in retail revenue primarily due to higher customer volumes and higher average rates from sales mix, partially offset by lower prices due to certain general rate case orders. Retail customer volumes increased 0.3%, primarily due to an increase in the average number of customers across the service territory and favorable impact of weather, partially offset by lower customer usage;
- \$18 million of lower purchased electricity costs from lower market prices and lower purchased volumes, partially due to higher wind generation from new Energy Vision 2020 ("EV 2020") generation and repowered facilities; and
- \$15 million of higher wholesale revenue due to higher wholesale volumes and higher average wholesale market prices.

The increases above were partially offset by:

- \$12 million of higher natural gas-fueled generation costs primarily due to higher average prices;
- \$8 million primarily from higher net amortization of deferred net power costs in accordance with established adjustment mechanisms; and
- \$6 million of higher coal-fueled generation costs primarily due to higher volumes, partially offset by lower average prices.

Operations and maintenance increased \$5 million, or 2%, for the first quarter of 2021 compared to 2020 primarily due to higher vegetation management costs of \$14 million, partially offset by cost savings from the retirement of Cholla unit 4 in December 2020 and decreased bad debt expense.

Depreciation and amortization increased \$12 million, or 5%, for the first quarter of 2021 compared to 2020 primarily due to the impacts of a new depreciation study effective January 1, 2021 of approximately \$37 million, including accelerated depreciation on coal-fueled units in Washington and an increase in assets placed in service, partially offset by a \$44 million decrease resulting from lower accelerated depreciation for Oregon's share of certain retired wind equipment due to repowering (\$3 million in the current quarter (fully offset in other revenue) compared to \$47 million in the first quarter of 2020 (\$7 million offset in other revenue and \$40 million offset in income tax expense)).

Property and other taxes increased \$12 million, or 24%, for the first quarter of 2021 compared to 2020 primarily due to higher property taxes from higher assessed property values.

Interest expense increased \$5 million, or 5%, for the first quarter of 2021 compared to 2020 primarily due to a higher average long-term debt balance.

Allowance for borrowed and equity funds decreased \$12 million, or 39%, for the first quarter of 2021 compared to 2020 primarily due to lower qualified construction work-in-progress balances due to large EV 2020 projects being placed in service.

Other, net increased \$10 million from a loss of \$4 million for the first quarter of 2020 to income of \$6 million for the first quarter of 2021, primarily due to market movements related to corporate-owned life insurance policies.

Income tax benefit decreased \$3 million, or 21%, for the first quarter of 2021 compared to the first quarter of 2020. The effective tax rate was (7)% for 2021 and (9)% for 2020. The effective tax rate increased primarily as a result of lower amortization of excess deferred income taxes in the current year, partially offset by increased PTCs from PacifiCorp's new wind-powered generating facilities. For the first quarter of 2021, \$3 million of excess deferred income taxes was amortized pursuant to regulatory orders for Wyoming, whereby portions of excess deferred income taxes were used to offset certain regulatory balances for Wyoming. For the first quarter of 2020, \$30 million of excess deferred income taxes was amortized pursuant to the Oregon RAC settlement, whereby a portion of excess deferred income taxes was used to accelerate depreciation for Oregon's share of certain retired wind equipment.

Liquidity and Capital Resources

As of March 31, 2021, PacifiCorp's total net liquidity was as follows (in millions):

Cash and cash equivalents	\$ 43
Credit facilities	1,200
Less:	
Short-term debt	(95)
Tax-exempt bond support	(218)
Net credit facilities	887
Total net liquidity	\$ 930
Credit facilities:	
Maturity dates	2022

Operating Activities

Net cash flows from operating activities for the three-month periods ended March 31, 2021 and 2020 were \$469 million and \$437 million, respectively. The change was primarily due to lower cash paid for income taxes, lower purchased power prices and volumes and lower fuel expense payments due to timing, partially offset by higher operating expense payments due to timing and higher cash paid for interest.

The timing of PacifiCorp's income tax cash flows from period to period can be significantly affected by the estimated federal income tax payment methods and assumptions for each payment date.

Investing Activities

Net cash flows from investing activities for the three-month periods ended March 31, 2021 and 2020 were \$(440) million and \$(339) million, respectively. The change is primarily due to an increase in capital expenditures of \$73 million and prior year proceeds from the settlement of notes receivable of \$25 million associated with the sale of certain Utah mining assets in 2015. Refer to "Future Uses of Cash" for discussion of capital expenditures.

Financing Activities

Net cash flows from financing activities for the three-month period ended March 31, 2021 was \$1 million. Sources of cash consisted of \$2 million from the borrowing of short-term debt.

Net cash flows from financing activities for the three-month period ended March 31, 2020 was \$(74) million. Uses of cash consisted of \$74 million for the repayment of short-term debt.

Short-term Debt

Regulatory authorities limit PacifiCorp to \$1.5 billion of short-term debt. As of March 31, 2021, PacifiCorp had \$95 million of short-term debt outstanding at a weighted average interest rate of 0.16%. As of December 31, 2020, PacifiCorp had \$93 million of short-term debt outstanding at a weighted average interest rate of 0.16%.

Debt Authorizations

PacifiCorp currently has regulatory authority from the OPUC and the IPUC to issue an additional \$3 billion of long-term debt. PacifiCorp must make a notice filing with the WUTC prior to any future issuance. PacifiCorp currently has an effective shelf registration statement with the SEC to issue an indeterminate amount of first mortgage bonds through September 2023.

Future Uses of Cash

PacifiCorp has available a variety of sources of liquidity and capital resources, both internal and external, including net cash flows from operating activities, public and private debt offerings, the issuance of commercial paper, the use of unsecured revolving credit facilities, capital contributions and other sources. These sources are expected to provide funds required for current operations, capital expenditures, debt retirements and other capital requirements. The availability and terms under which PacifiCorp has access to external financing depends on a variety of factors, including PacifiCorp's credit ratings, investors' judgment of risk and conditions in the overall capital markets, including the condition of the utility industry.

Capital Expenditures

PacifiCorp has significant future capital requirements. Capital expenditure needs are reviewed regularly by management and may change significantly as a result of these reviews, which may consider, among other factors, impacts to customers' rates; changes in environmental and other rules and regulations; outcomes of regulatory proceedings; changes in income tax laws; general business conditions; load projections; system reliability standards; the cost and efficiency of construction labor, equipment and materials; commodity prices; and the cost and availability of capital.

Historical and forecast capital expenditures, each of which exclude amounts for non-cash equity AFUDC and other non-cash items, are as follows (in millions):

	Three-Month Periods		Annual
	Ended March 31,		Forecast
	2020	2021	2021
Wind generation	\$ 106	\$ 33	\$ 193
Electric distribution	99	195	730
Electric transmission	92	60	426
Other	69	151	548
Total	<u>\$ 366</u>	<u>\$ 439</u>	<u>\$ 1,897</u>

PacifiCorp's 2019 IRP identified a significant increase in renewable resource generation and associated transmission. PacifiCorp has included an estimate of the 2019 IRP resources in its forecast capital expenditures for 2021 through 2023. These estimates are likely to change as a result of the RFP process. PacifiCorp's historical and forecast capital expenditures include the following:

- Wind generation includes both growth projects and operating expenditures. Growth projects include:
 - Construction of wind-powered generating facilities at PacifiCorp totaling \$27 million and \$89 million for the three-month periods ended March 31, 2021 and 2020, respectively. Construction includes 674 MWs of new wind-powered generating facilities that were placed in-service in 2020 and 516 MWs expected to be placed in-service in 2021. The energy production for these new facilities is expected to qualify for 100% of the federal PTCs available for 10 years once the equipment is placed in-service. PacifiCorp's 2019 IRP identified 1,920 MWs of new wind-powered generating resources that are expected to come online in 2024. PacifiCorp anticipates that the additional new wind-powered generation will be a mixture of owned and contracted resources. PacifiCorp anticipates costs associated with the construction of wind-powered generating facilities will total an additional \$100 million for 2021.
 - Repowering existing wind-powered generating facilities at PacifiCorp totaling \$5 million and \$16 million for the three-month periods ended March 31, 2021 and 2020, respectively. Certain repowering projects were placed in service in 2019 and 2020 with the remaining repowering projects expected to be placed in-service in 2021. The energy production from such repowered facilities is expected to qualify for 100% of the federal renewable electricity PTCs available for 10 years following each facility's return to service. Planned additional spending for certain existing wind-powered generating facilities totals \$6 million for 2021.
 - Acquisition and repowering of wind-powered generating facilities totals \$1 million for the three-month period ended March 31, 2021. Planned additional spending for these wind-powered generating facilities totals \$44 million for 2021.

- Electric distribution includes both growth projects and operating expenditures. Operating expenditures includes planned spend on wildfire mitigation, wildfire damage restoration and storm damage repairs. Expenditures for these items totaled \$83 million and \$4 million for the three-month periods ended March 31, 2021 and 2020, respectively. PacifiCorp anticipates costs associated with these activities will total an additional \$145 million in 2021. Remaining investments relate to expenditures for new connections and distribution.
- Electric transmission includes both growth projects and operating expenditures. Transmission investment through 2020 primarily reflects costs for the 140-mile 500-kV Aeolus-Bridger/Anticline transmission line, a major segment of PacifiCorp's Energy Gateway Transmission expansion program, placed in-service in November 2020. Planned spending for the additional Energy Gateway Transmission segments totals \$182 million in 2021 and are expected to be placed in service in 2023 - 2024.
- Other includes both growth projects and operating expenditures. Expenditures for information technology totaled \$13 million and \$10 million for the three-month periods ended March 31, 2021 and 2020, respectively. PacifiCorp anticipates costs associated with information technology will total an additional \$118 million for 2021. Remaining investments relate to operating projects that consist of routine expenditures for generation and other infrastructure needed to serve existing and expected demand.

Requests for Proposals

PacifiCorp issues individual RFPs to procure resources identified in the IRP or resources driven by customer demands. The IRP and the RFPs provide for the identification and staged procurement of resources to meet load or state-specific compliance obligations. Depending upon the specific RFP, applicable laws and regulations may require PacifiCorp to file draft RFPs with the UPSC, the OPUC and the WUTC. Approval by the UPSC, the OPUC or the WUTC may be required depending on the nature of the RFPs.

PacifiCorp issued the 2020 All Source RFP to the market in July 2020. The 2020 All Source RFP sought bids for resources capable of coming online by the end of 2024 up to the level of resources identified in PacifiCorp's 2019 IRP. An initial shortlist was identified in October 2020. The final shortlist of winning bids will be identified by June 2021.

Contractual Obligations

As of March 31, 2021, there have been no material changes outside the normal course of business in contractual obligations from the information provided in Item 7 of PacifiCorp's Annual Report on Form 10-K for the year ended December 31, 2020.

Regulatory Matters

PacifiCorp is subject to comprehensive regulation. Refer to "Regulatory Matters" in Berkshire Hathaway Energy's Part I, Item 2 of this Form 10-Q for discussion regarding PacifiCorp's current regulatory matters.

Environmental Laws and Regulations

PacifiCorp is subject to federal, state and local laws and regulations regarding climate change, wildfire prevention and mitigation, RPS, air and water quality, emissions performance standards, coal combustion byproduct disposal, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact PacifiCorp's current and future operations. In addition to imposing continuing compliance obligations, these laws and regulations provide regulators with the authority to levy substantial penalties for noncompliance including fines, injunctive relief and other sanctions. These laws and regulations are administered by various federal, state and local agencies. PacifiCorp believes it is in material compliance with all applicable laws and regulations, although many are subject to interpretation that may ultimately be resolved by the courts. Environmental laws and regulations continue to evolve, and PacifiCorp is unable to predict the impact of the changing laws and regulations on its operations and financial results.

Refer to "Environmental Laws and Regulations" in Berkshire Hathaway Energy's Part I, Item 2 of this Form 10-Q for additional information regarding environmental laws and regulations.

Critical Accounting Estimates

Certain accounting measurements require management to make estimates and judgments concerning transactions that will be settled several years in the future. Amounts recognized on the Consolidated Financial Statements based on such estimates involve numerous assumptions subject to varying and potentially significant degrees of judgment and uncertainty and will likely change in the future as additional information becomes available. Estimates are used for, but not limited to, the accounting for the effects of certain types of regulation, derivatives, pension and other postretirement benefits, income taxes and revenue recognition-unbilled revenue. For additional discussion of PacifiCorp's critical accounting estimates, see Item 7 of PacifiCorp's Annual Report on Form 10-K for the year ended December 31, 2020. There have been no significant changes in PacifiCorp's assumptions regarding critical accounting estimates since December 31, 2020.

**MidAmerican Funding, LLC and its subsidiaries and MidAmerican Energy Company
Consolidated Financial Section**

PART I

Item 1. Financial Statements

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors and Shareholder of
MidAmerican Energy Company

Results of Review of Interim Financial Information

We have reviewed the accompanying balance sheet of MidAmerican Energy Company ("MidAmerican Energy") as of March 31, 2021, the related statements of operations, changes in shareholder's equity, and cash flows for the three-month periods ended March 31, 2021 and 2020, and the related notes (collectively referred to as the "interim financial information"). Based on our reviews, we are not aware of any material modifications that should be made to the accompanying interim financial information for it to be in conformity with accounting principles generally accepted in the United States of America.

We have previously audited, in accordance with the standards of the Public Company Accounting Oversight Board (United States) (PCAOB), the balance sheet of MidAmerican Energy as of December 31, 2020, and the related statements of operations, changes in shareholder's equity, and cash flows for the year then ended (not presented herein); and in our report dated February 26, 2021, we expressed an unqualified opinion on those financial statements. In our opinion, the information set forth in the accompanying balance sheet as of December 31, 2020, is fairly stated, in all material respects, in relation to the balance sheet from which it has been derived.

Basis for Review Results

This interim financial information is the responsibility of MidAmerican Energy's management. We are a public accounting firm registered with the PCAOB and are required to be independent with respect to MidAmerican Energy in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our reviews in accordance with standards of the PCAOB. A review of interim financial information consists principally of applying analytical procedures and making inquiries of persons responsible for financial and accounting matters. It is substantially less in scope than an audit conducted in accordance with the standards of the PCAOB, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, we do not express such an opinion.

/s/ Deloitte & Touche LLP

Des Moines, Iowa
April 30, 2021

MIDAMERICAN ENERGY COMPANY
BALANCE SHEETS (Unaudited)
(Amounts in millions)

	As of	
	March 31, 2021	December 31, 2020
ASSETS		
Current assets:		
Cash and cash equivalents	\$ 37	\$ 38
Trade receivables, net	521	234
Income tax receivable	293	—
Inventories	231	278
Other current assets	103	73
Total current assets	1,185	623
Property, plant and equipment, net	19,223	19,279
Regulatory assets	439	392
Investments and restricted investments	938	911
Other assets	215	232
Total assets	\$ 22,000	\$ 21,437

The accompanying notes are an integral part of these financial statements.

MIDAMERICAN ENERGY COMPANY
BALANCE SHEETS (Unaudited) (continued)
(Amounts in millions)

	As of	
	March 31, 2021	December 31, 2020
LIABILITIES AND SHAREHOLDER'S EQUITY		
Current liabilities:		
Accounts payable	\$ 292	\$ 408
Accrued interest	86	78
Accrued property, income and other taxes	124	161
Short-term debt	387	—
Other current liabilities	186	183
Total current liabilities	1,075	830
Long-term debt	7,224	7,210
Regulatory liabilities	1,257	1,111
Deferred income taxes	3,107	3,054
Asset retirement obligations	711	709
Other long-term liabilities	414	458
Total liabilities	13,788	13,372
Commitments and contingencies (Note 8)		
Shareholder's equity:		
Common stock - 350 shares authorized, no par value, 71 shares issued and outstanding	—	—
Additional paid-in capital	561	561
Retained earnings	7,651	7,504
Total shareholder's equity	8,212	8,065
Total liabilities and shareholder's equity	\$ 22,000	\$ 21,437

The accompanying notes are an integral part of these financial statements.

MIDAMERICAN ENERGY COMPANY
STATEMENTS OF OPERATIONS (Unaudited)
(Amounts in millions)

	Three-Month Periods Ended March 31,	
	2021	2020
Operating revenue:		
Regulated electric	\$ 545	\$ 471
Regulated natural gas and other	522	210
Total operating revenue	1,067	681
Operating expenses:		
Cost of fuel and energy	151	80
Cost of natural gas purchased for resale and other	432	128
Operations and maintenance	193	165
Depreciation and amortization	207	176
Property and other taxes	36	34
Total operating expenses	1,019	583
Operating income	48	98
Other income (expense):		
Interest expense	(74)	(76)
Allowance for borrowed funds	2	3
Allowance for equity funds	6	8
Other, net	11	(5)
Total other income (expense)	(55)	(70)
(Loss) income before income tax benefit	(7)	28
Income tax benefit	(154)	(123)
Net income	<u>\$ 147</u>	<u>\$ 151</u>

The accompanying notes are an integral part of these financial statements.

MIDAMERICAN ENERGY COMPANY
STATEMENTS OF CHANGES IN SHAREHOLDER'S EQUITY (Unaudited)
(Amounts in millions)

	<u>Common Stock</u>	<u>Additional Paid-in Capital</u>	<u>Retained Earnings</u>	<u>Total Shareholder's Equity</u>
Balance, December 31, 2019	\$ —	\$ 561	\$ 6,679	\$ 7,240
Net income	—	—	151	151
Balance, March 31, 2020	<u>\$ —</u>	<u>\$ 561</u>	<u>\$ 6,830</u>	<u>\$ 7,391</u>
Balance, December 31, 2020	\$ —	\$ 561	\$ 7,504	\$ 8,065
Net income	—	—	147	147
Balance, March 31, 2021	<u>\$ —</u>	<u>\$ 561</u>	<u>\$ 7,651</u>	<u>\$ 8,212</u>

The accompanying notes are an integral part of these financial statements.

MIDAMERICAN ENERGY COMPANY
STATEMENTS OF CASH FLOWS (Unaudited)
(Amounts in millions)

	Three-Month Periods Ended March 31,	
	2021	2020
Cash flows from operating activities:		
Net income	\$ 147	\$ 151
Adjustments to reconcile net income to net cash flows from operating activities:		
Depreciation and amortization	207	176
Amortization of utility plant to other operating expenses	8	9
Allowance for equity funds	(6)	(8)
Deferred income taxes and amortization of investment tax credits	154	91
Settlements of asset retirement obligations	(4)	(2)
Other, net	(4)	14
Changes in other operating assets and liabilities:		
Trade receivables and other assets	(299)	15
Inventories	46	(6)
Derivative collateral, net	(14)	1
Pension and other postretirement benefit plans	1	(6)
Accrued property, income and other taxes, net	(331)	(286)
Accounts payable and other liabilities	10	70
Net cash flows from operating activities	(85)	219
Cash flows from investing activities:		
Capital expenditures	(298)	(472)
Purchases of marketable securities	(52)	(127)
Proceeds from sales of marketable securities	47	124
Other, net	—	5
Net cash flows from investing activities	(303)	(470)
Cash flows from financing activities:		
Net proceeds from short-term debt	387	50
Other, net	—	(1)
Net cash flows from financing activities	387	49
Net change in cash and cash equivalents and restricted cash and cash equivalents	(1)	(202)
Cash and cash equivalents and restricted cash and cash equivalents at beginning of period	45	330
Cash and cash equivalents and restricted cash and cash equivalents at end of period	\$ 44	\$ 128

The accompanying notes are an integral part of these financial statements.

MIDAMERICAN ENERGY COMPANY
NOTES TO FINANCIAL STATEMENTS
(Unaudited)

(1) General

MidAmerican Energy Company ("MidAmerican Energy") is a public utility with electric and natural gas operations and is the principal subsidiary of MHC Inc. ("MHC"). MHC is a holding company that conducts no business other than the ownership of its subsidiaries. MHC's nonregulated subsidiary is Midwest Capital Group, Inc. MHC is the direct, wholly owned subsidiary of MidAmerican Funding, LLC ("MidAmerican Funding"), which is an Iowa limited liability company with Berkshire Hathaway Energy Company ("BHE") as its sole member. BHE is a holding company based in Des Moines, Iowa, that owns subsidiaries principally engaged in energy businesses. BHE is a consolidated subsidiary of Berkshire Hathaway Inc. ("Berkshire Hathaway").

The unaudited Financial Statements have been prepared in accordance with accounting principles generally accepted in the United States of America ("GAAP") for interim financial information and the United States Securities and Exchange Commission's rules and regulations for Form 10-Q and Article 10 of Regulation S-X. Accordingly, they do not include all of the disclosures required by GAAP for annual financial statements. Management believes the unaudited Financial Statements contain all adjustments (consisting only of normal recurring adjustments) considered necessary for the fair presentation of the unaudited Financial Statements as of March 31, 2021, and for the three-month periods ended March 31, 2021 and 2020. The Statements of Comprehensive Income have been omitted as net income equals comprehensive income for the three-month period ended March 31, 2021 and 2020. The results of operations for the three-month periods ended March 31, 2021, are not necessarily indicative of the results to be expected for the full year.

The preparation of the unaudited Financial Statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the unaudited Financial Statements and the reported amounts of revenue and expenses during the period. Actual results may differ from the estimates used in preparing the unaudited Financial Statements. Note 2 of Notes to Financial Statements included in MidAmerican Energy's Annual Report on Form 10-K for the year ended December 31, 2020, describes the most significant accounting policies used in the preparation of the unaudited Financial Statements. There have been no significant changes in MidAmerican Energy's assumptions regarding significant accounting estimates and policies during the three-month period ended March 31, 2021.

(2) Cash and Cash Equivalents and Restricted Cash and Cash Equivalents

Cash equivalents consist of funds invested in money market mutual funds, United States Treasury Bills and other investments with a maturity of three months or less when purchased. Cash and cash equivalents exclude amounts where availability is restricted by legal requirements, loan agreements or other contractual provisions. Restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, consist substantially of funds restricted for wildlife preservation and, as of December 31, 2020, the purpose of constructing solid waste facilities under tax-exempt bond obligation agreements. A reconciliation of cash and cash equivalents and restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, as presented in the Statements of Cash Flows is outlined below and disaggregated by the line items in which they appear on the Balance Sheets (in millions):

	As of	
	March 31, 2021	December 31, 2020
Cash and cash equivalents	\$ 37	\$ 38
Restricted cash and cash equivalents in other current assets	7	7
Total cash and cash equivalents and restricted cash and cash equivalents	<u>\$ 44</u>	<u>\$ 45</u>

(3) Property, Plant and Equipment, Net

Property, plant and equipment, net consists of the following (in millions):

		As of	
	Depreciable Life	March 31, 2021	December 31, 2020
Utility plant in service, net:			
Generation	20-70 years	\$ 17,083	\$ 16,980
Transmission	52-75 years	2,372	2,365
Electric distribution	20-75 years	4,433	4,369
Natural gas distribution	29-75 years	1,970	1,955
Utility plant in service		25,858	25,669
Accumulated depreciation and amortization		(7,061)	(6,902)
Utility plant in service, net		18,797	18,767
Nonregulated property, net:			
Nonregulated property gross	20-50 years	7	7
Accumulated depreciation and amortization		(1)	(1)
Nonregulated property, net		6	6
		18,803	18,773
Construction work-in-progress		420	506
Property, plant and equipment, net		\$ 19,223	\$ 19,279

(4) Regulatory Matters

Natural Gas Purchased for Resale

In February 2021, severe cold weather over the central United States caused disruptions in natural gas supply from the southern part of the United States. These disruptions, combined with increased demand, resulted in historically high prices for natural gas purchased for resale to MidAmerican Energy's retail customers and caused an approximate \$245 million increase in natural gas costs above those normally expected. These increased costs are reflected in cost of natural gas purchased for resale and other on the Statement of Operations and their recovery through the Purchased Gas Adjustment Clause is reflected in regulated natural gas and other revenue.

To mitigate the impact to customers, the Iowa Utilities Board ordered the recovery of these higher costs to be applied to natural gas sales over the period April 2021 through April 2022. While sufficient liquidity is available to MidAmerican Energy, the increased costs and longer recovery period resulted in higher working capital requirements during three-month period ended March 31, 2021.

(5) Income Taxes

The effective income tax rate for the three-month period ended March 31, 2021, is 2,200% and results from a \$154 million income tax benefit associated with a \$7 million pre-tax loss. The \$154 million income tax benefit is primarily comprised of a \$2 million benefit (21%) from the application of the statutory income tax rate to the pre-tax loss and a \$168 million benefit (2,400%) from income tax credits, partially offset by a \$13 million expense (186%) from the effects of ratemaking.

A reconciliation of the federal statutory income tax rate to MidAmerican Energy's effective income tax rate applicable to income before income tax benefit is as follows:

	Three-Month Periods Ended March 31,	
	2021	2020
Federal statutory income tax rate	21 %	21 %
Income tax credits	2,400	(430)
State income tax, net of federal income tax impacts	(29)	(28)
Effects of ratemaking	(186)	(3)
Other, net	(6)	1
Effective income tax rate	<u>2,200 %</u>	<u>(439)%</u>

Income tax credits relate primarily to production tax credits ("PTCs") from MidAmerican Energy's wind-powered generating facilities. Federal renewable electricity PTCs are earned as energy from qualifying wind-powered generating facilities is produced and sold and are based on a per-kilowatt hour rate pursuant to the applicable federal income tax law. MidAmerican Energy recognizes its renewable electricity PTCs throughout the year based on when the credits are earned and excludes them from the annual effective tax rate that is the basis for the interim recognition of other income tax expense. Wind-powered generating facilities are eligible for the credits for 10 years from the date the qualifying generating facilities are placed in-service. PTCs for the three-month periods ended March 31, 2021 and 2020 totaled \$151 million and \$120 million, respectively.

Berkshire Hathaway includes BHE and subsidiaries in its United States federal and Iowa state income tax returns. Consistent with established regulatory practice, MidAmerican Energy's provision for income tax has been computed on a stand-alone basis, and substantially all of its currently payable or receivable income tax is remitted to or received from BHE. The timing of MidAmerican Energy's income tax cash flows from period to period can be significantly affected by the estimated federal income tax payment methods and assumptions for each payment date. MidAmerican Energy made no cash payments for income tax to BHE for the three-month period ended March 31, 2021, and made net cash payments for income tax to BHE totaling \$46 million for the three-month period ended March 31, 2020.

(6) Employee Benefit Plans

MidAmerican Energy sponsors a noncontributory defined benefit pension plan covering a majority of all employees of BHE and its domestic energy subsidiaries other than PacifiCorp and NV Energy, Inc. MidAmerican Energy also sponsors certain postretirement healthcare and life insurance benefits covering substantially all retired employees of BHE and its domestic energy subsidiaries other than PacifiCorp and NV Energy, Inc.

Net periodic benefit cost (credit) for the plans of MidAmerican Energy and the aforementioned affiliates included the following components (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Pension:		
Service cost	\$ 5	\$ 1
Interest cost	6	6
Expected return on plan assets	(9)	(10)
Net periodic benefit cost (credit)	<u>\$ 2</u>	<u>\$ (3)</u>
Other postretirement:		
Service cost	\$ 2	\$ 1
Interest cost	2	2
Expected return on plan assets	(2)	(3)
Net amortization	(1)	(1)
Net periodic benefit cost (credit)	<u>\$ 1</u>	<u>\$ (1)</u>

Amounts other than the service cost for pension and other postretirement benefit plans are recorded in Other, net in the Statements of Operations. Employer contributions to the pension and other postretirement benefit plans are expected to be \$7 million and \$12 million, respectively, during 2021. As of March 31, 2021, \$2 million and \$3 million of contributions had been made to the pension and other postretirement benefit plans, respectively.

(7) Fair Value Measurements

The carrying value of MidAmerican Energy's cash, certain cash equivalents, receivables, payables, accrued liabilities and short-term borrowings approximates fair value because of the short-term maturity of these instruments. MidAmerican Energy has various financial assets and liabilities that are measured at fair value on the Financial Statements using inputs from the three levels of the fair value hierarchy. A financial asset or liability classification within the hierarchy is determined based on the lowest level input that is significant to the fair value measurement. The three levels are as follows:

- Level 1 — Inputs are unadjusted quoted prices in active markets for identical assets or liabilities that MidAmerican Energy has the ability to access at the measurement date.
- Level 2 — Inputs include quoted prices for similar assets or liabilities in active markets, quoted prices for identical or similar assets or liabilities in markets that are not active, inputs other than quoted prices that are observable for the asset or liability and inputs that are derived principally from or corroborated by observable market data by correlation or other means (market corroborated inputs).
- Level 3 — Unobservable inputs reflect MidAmerican Energy's judgments about the assumptions market participants would use in pricing the asset or liability since limited market data exists. MidAmerican Energy develops these inputs based on the best information available, including its own data.

The following table presents MidAmerican Energy's financial assets and liabilities recognized on the Balance Sheets and measured at fair value on a recurring basis (in millions):

	Input Levels for Fair Value Measurements				Other ⁽¹⁾	Total				
	Level 1	Level 2	Level 3							
As of March 31, 2021:										
Assets:										
Commodity derivatives	\$	—	\$	3	\$	2	\$	(2)	\$	3
Money market mutual funds ⁽²⁾		38		—		—		—		38
Debt securities:										
United States government obligations		210		—		—		—		210
International government obligations		—		5		—		—		5
Corporate obligations		—		71		—		—		71
Municipal obligations		—		2		—		—		2
Agency, asset and mortgage-backed obligations		—		5		—		—		5
Equity securities:										
United States companies		395		—		—		—		395
International companies		8		—		—		—		8
Investment funds		24		—		—		—		24
	\$	675	\$	86	\$	2	\$	(2)	\$	761
Liabilities - commodity derivatives	\$	—	\$	(1)	\$	(1)	\$	2	\$	—

	Input Levels for Fair Value Measurements				Other ⁽¹⁾	Total				
	Level 1	Level 2	Level 3							
As of December 31, 2020:										
Assets:										
Commodity derivatives	\$	—	\$	4	\$	5	\$	(5)	\$	4
Money market mutual funds ⁽²⁾		41		—		—		—		41
Debt securities:										
United States government obligations		200		—		—		—		200
International government obligations		—		5		—		—		5
Corporate obligations		—		73		—		—		73
Municipal obligations		—		2		—		—		2
Agency, asset and mortgage-backed obligations		—		6		—		—		6
Equity securities:										
United States companies		381		—		—		—		381
International companies		9		—		—		—		9
Investment funds		17		—		—		—		17
	\$	648	\$	90	\$	5	\$	(5)	\$	738
Liabilities - commodity derivatives	\$	—	\$	(4)	\$	(3)	\$	5	\$	(2)

(1) Represents netting under master netting arrangements and a net cash collateral receivable of \$— million as of March 31, 2021 and December 31, 2020, respectively.

(2) Amounts are included in cash and cash equivalents and investments and restricted investments on the Balance Sheets. The fair value of these money market mutual funds approximates cost.

MidAmerican Energy's investments in money market mutual funds and debt and equity securities are stated at fair value, with debt securities accounted for as available-for-sale securities. When available, a readily observable quoted market price or net asset value of an identical security in an active market is used to record the fair value. In the absence of a quoted market price or net asset value of an identical security, the fair value is determined using pricing models or net asset values based on observable market inputs and quoted market prices of securities with similar characteristics.

MidAmerican Energy's long-term debt is carried at cost on the Balance Sheets. The fair value of MidAmerican Energy's long-term debt is a Level 2 fair value measurement and has been estimated based upon quoted market prices, where available, or at the present value of future cash flows discounted at rates consistent with comparable maturities with similar credit risks. The carrying value of MidAmerican Energy's variable-rate long-term debt approximates fair value because of the frequent repricing of these instruments at market rates. The following table presents the carrying value and estimated fair value of MidAmerican Energy's long-term debt (in millions):

	As of March 31, 2021		As of December 31, 2020	
	Carrying Value	Fair Value	Carrying Value	Fair Value
Long-term debt	\$ 7,224	\$ 8,305	\$ 7,210	\$ 9,130

(8) Commitments and Contingencies

Legal Matters

MidAmerican Energy is party to a variety of legal actions arising out of the normal course of business. Plaintiffs occasionally seek punitive or exemplary damages. MidAmerican Energy does not believe that such normal and routine litigation will have a material impact on its financial results.

Environmental Laws and Regulations

MidAmerican Energy is subject to federal, state and local laws and regulations regarding climate change, renewable portfolio standards, air and water quality, emissions performance standards, coal combustion byproduct disposal, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact its current and future operations. MidAmerican Energy believes it is in material compliance with all applicable laws and regulations.

Transmission Rates

MidAmerican Energy's wholesale transmission rates are set annually using Federal Energy Regulatory Commission ("FERC")-approved formula rates subject to true-up for actual cost of service. MidAmerican Energy is authorized by the FERC to include a 0.50% adder beyond the approved base return on equity ("ROE") effective January 2015. Prior to September 2016, the rates in effect were based on a 12.38% ROE. In November 2013 and February 2015, a coalition of intervenors filed successive complaints with the FERC requesting that the 12.38% ROE no longer be found just and reasonable and sought to reduce the base ROE to 9.15% and 8.67%, respectively. In September 2016, the FERC issued an order for the first complaint, which reduces the base ROE to 10.32% and required refunds, plus interest, for the period from November 2013 through February 2015. Customer refunds relative to the first complaint occurred in February 2017. In November 2019, the FERC issued an order addressing the second complaint and issues on appeal in the first complaint. The order established a ROE of 9.88% (10.38% including the 0.50% adder) for the 15-month refund period of the first complaint and prospectively from September 2016 forward. In May 2020, the FERC issued an order on rehearing of the November 2019 order. The May 2020 order affirmed the FERC's prior decision to dismiss the second complaint and established an ROE of 10.02% (10.52% including the 0.50% adder) for the 15-month refund period of the first complaint and prospectively from September 2016 to the date of the May 2020 order. These orders continue to be subject to judicial appeal. MidAmerican Energy cannot predict the ultimate outcome of these matters and, as of March 31, 2021, has accrued a \$10 million liability for refunds of amounts collected under the higher ROE during the periods covered by both complaints.

(9) Revenue from Contracts with Customers

The following table summarizes MidAmerican Energy's revenue from contracts with customers ("Customer Revenue") by line of business and customer class, including a reconciliation to MidAmerican Energy's reportable segment information included in Note 10, (in millions):

	For the Three-Month Period Ended March 31, 2021			
	Electric	Natural Gas	Other	Total
Customer Revenue:				
Retail:				
Residential	\$ 161	\$ 308	\$ —	\$ 469
Commercial	71	129	—	200
Industrial	190	12	—	202
Natural gas transportation services	—	10	—	10
Other retail ⁽¹⁾	30	1	—	31
Total retail	452	460	—	912
Wholesale	74	51	—	125
Multi-value transmission projects	15	—	—	15
Other Customer Revenue	—	—	10	10
Total Customer Revenue	541	511	10	1,062
Other revenue	4	1	—	5
Total operating revenue	\$ 545	\$ 512	\$ 10	\$ 1,067

	For the Three-Month Period Ended March 31, 2020			
	Electric	Natural Gas	Other	Total
Customer Revenue:				
Retail:				
Residential	\$ 148	\$ 128	\$ —	\$ 276
Commercial	70	43	—	113
Industrial	163	4	—	167
Natural gas transportation services	—	11	—	11
Other retail ⁽¹⁾	29	—	—	29
Total retail	410	186	—	596
Wholesale	42	22	—	64
Multi-value transmission projects	16	—	—	16
Other Customer Revenue	—	—	1	1
Total Customer Revenue	468	208	1	677
Other revenue	3	1	—	4
Total operating revenue	\$ 471	\$ 209	\$ 1	\$ 681

- (1) Other retail includes provisions for rate refunds, for which any actual refunds will be reflected in the applicable customer classes upon resolution of the related regulatory proceeding.

(10) Segment Information

MidAmerican Energy has identified two reportable segments: regulated electric and regulated natural gas. The regulated electric segment derives most of its revenue from regulated retail sales of electricity to residential, commercial, and industrial customers and from wholesale sales. The regulated natural gas segment derives most of its revenue from regulated retail sales of natural gas to residential, commercial, and industrial customers and also obtains revenue by transporting natural gas owned by others through its distribution system. Pricing for regulated electric and regulated natural gas sales are established separately by regulatory agencies; therefore, management also reviews each segment separately to make decisions regarding allocation of resources and in evaluating performance. Common operating costs, interest income, interest expense and income tax expense are allocated to each segment based on certain factors, which primarily relate to the nature of the cost.

The following tables provide information on a reportable segment basis (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Operating revenue:		
Regulated electric	\$ 545	\$ 471
Regulated natural gas	512	209
Other	10	1
Total operating revenue	<u>\$ 1,067</u>	<u>\$ 681</u>
Operating income:		
Regulated electric	\$ 9	\$ 59
Regulated natural gas	39	39
Total operating income	48	98
Interest expense	(74)	(76)
Allowance for borrowed funds	2	3
Allowance for equity funds	6	8
Other, net	11	(5)
(Loss) income before income tax benefit	<u>\$ (7)</u>	<u>\$ 28</u>
	As of	
	March 31, 2021	December 31, 2020
Assets:		
Regulated electric	\$ 20,272	\$ 19,892
Regulated natural gas	1,725	1,544
Other	3	1
Total assets	<u>\$ 22,000</u>	<u>\$ 21,437</u>

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Managers and Member of
MidAmerican Funding, LLC

Results of Review of Interim Financial Information

We have reviewed the accompanying consolidated balance sheet of MidAmerican Funding, LLC and subsidiaries ("MidAmerican Funding") as of March 31, 2021, the related consolidated statements of operations, changes in member's equity, and cash flows for the three-month periods ended March 31, 2021 and 2020, and the related notes (collectively referred to as the "interim financial information"). Based on our reviews, we are not aware of any material modifications that should be made to the accompanying interim financial information for it to be in conformity with accounting principles generally accepted in the United States of America.

We have previously audited, in accordance with the standards of the Public Company Accounting Oversight Board (United States) (PCAOB) and in accordance with auditing standards generally accepted in the United States of America, the consolidated balance sheet of MidAmerican Funding as of December 31, 2020, and the related consolidated statements of operations, changes in member's equity, and cash flows for the year then ended (not presented herein); and in our report dated February 26, 2021, we expressed an unqualified opinion on those consolidated financial statements. In our opinion, the information set forth in the accompanying consolidated balance sheet as of December 31, 2020, is fairly stated, in all material respects, in relation to the consolidated balance sheet from which it has been derived.

Basis for Review Results

This interim financial information is the responsibility of MidAmerican Funding's management. We are a public accounting firm registered with the PCAOB and are required to be independent with respect to MidAmerican Funding in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our reviews in accordance with standards of the PCAOB and with auditing standards generally accepted in the United States of America applicable to reviews of interim financial information. A review of interim financial information consists principally of applying analytical procedures and making inquiries of persons responsible for financial and accounting matters. It is substantially less in scope than an audit conducted in accordance with the standards of the PCAOB and with auditing standards generally accepted in the United States of America, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, we do not express such an opinion.

/s/ Deloitte & Touche LLP

Des Moines, Iowa
April 30, 2021

MIDAMERICAN FUNDING, LLC AND SUBSIDIARIES
CONSOLIDATED BALANCE SHEETS (Unaudited)
(Amounts in millions)

	As of	
	March 31, 2021	December 31, 2020
ASSETS		
Current assets:		
Cash and cash equivalents	\$ 38	\$ 39
Trade receivables, net	521	234
Income tax receivable	295	—
Inventories	231	278
Other current assets	102	74
Total current assets	1,187	625
Property, plant and equipment, net	19,223	19,279
Goodwill	1,270	1,270
Regulatory assets	439	392
Investments and restricted investments	940	913
Other assets	215	232
Total assets	\$ 23,274	\$ 22,711

The accompanying notes are an integral part of these consolidated financial statements.

MIDAMERICAN FUNDING, LLC AND SUBSIDIARIES
CONSOLIDATED BALANCE SHEETS (Unaudited) (continued)
(Amounts in millions)

	As of	
	March 31, 2021	December 31, 2020
LIABILITIES AND MEMBER'S EQUITY		
Current liabilities:		
Accounts payable	\$ 292	\$ 408
Accrued interest	87	83
Accrued property, income and other taxes	124	161
Note payable to affiliate	184	177
Short-term debt	387	—
Other current liabilities	187	183
Total current liabilities	1,261	1,012
Long-term debt	7,464	7,450
Regulatory liabilities	1,257	1,111
Deferred income taxes	3,104	3,052
Asset retirement obligations	711	709
Other long-term liabilities	414	458
Total liabilities	14,211	13,792
Commitments and contingencies (Note 8)		
Member's equity:		
Paid-in capital	1,679	1,679
Retained earnings	7,384	7,240
Total member's equity	9,063	8,919
Total liabilities and member's equity	\$ 23,274	\$ 22,711

The accompanying notes are an integral part of these consolidated financial statements.

MIDAMERICAN FUNDING, LLC AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF OPERATIONS (Unaudited)
(Amounts in millions)

	Three-Month Periods Ended March 31,	
	2021	2020
Operating revenue:		
Regulated electric	\$ 545	\$ 471
Regulated natural gas and other	522	215
Total operating revenue	1,067	686
Operating expenses:		
Cost of fuel and energy	151	80
Cost of natural gas purchased for resale and other	432	129
Operations and maintenance	193	165
Depreciation and amortization	207	176
Property and other taxes	36	34
Total operating expenses	1,019	584
Operating income	48	102
Other income (expense):		
Interest expense	(78)	(81)
Allowance for borrowed funds	2	3
Allowance for equity funds	6	8
Other, net	10	(6)
Total other income (expense)	(60)	(76)
(Loss) income before income tax benefit	(12)	26
Income tax benefit	(156)	(124)
Net income	\$ 144	\$ 150

The accompanying notes are an integral part of these consolidated financial statements.

MIDAMERICAN FUNDING, LLC AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CHANGES IN MEMBER'S EQUITY (Unaudited)
(Amounts in millions)

	Paid-in Capital	Retained Earnings	Total Member's Equity
Balance, December 31, 2019	\$ 1,679	\$ 6,422	\$ 8,101
Net income	—	150	150
Balance, March 31, 2020	<u>\$ 1,679</u>	<u>\$ 6,572</u>	<u>\$ 8,251</u>
Balance, December 31, 2020	\$ 1,679	\$ 7,240	\$ 8,919
Net income	—	144	144
Balance, March 31, 2021	<u>\$ 1,679</u>	<u>\$ 7,384</u>	<u>\$ 9,063</u>

The accompanying notes are an integral part of these consolidated financial statements.

MIDAMERICAN FUNDING, LLC AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CASH FLOWS (Unaudited)
(Amounts in millions)

	Three-Month Periods Ended March 31,	
	2021	2020
Cash flows from operating activities:		
Net income	\$ 144	\$ 150
Adjustments to reconcile net income to net cash flows from operating activities:		
Depreciation and amortization	207	176
Amortization of utility plant to other operating expenses	8	9
Allowance for equity funds	(6)	(8)
Deferred income taxes and amortization of investment tax credits	153	93
Settlements of asset retirement obligations	(4)	(2)
Other, net	(3)	15
Changes in other operating assets and liabilities:		
Trade receivables and other assets	(298)	16
Inventories	46	(6)
Derivative collateral, net	(14)	1
Pension and other postretirement benefit plans	1	(6)
Accrued property, income and other taxes, net	(332)	(290)
Accounts payable and other liabilities	6	66
Net cash flows from operating activities	(92)	214
Cash flows from investing activities:		
Capital expenditures	(298)	(472)
Purchases of marketable securities	(52)	(127)
Proceeds from sales of marketable securities	47	124
Other, net	—	6
Net cash flows from investing activities	(303)	(469)
Cash flows from financing activities:		
Net change in note payable to affiliate	7	3
Net proceeds from short-term debt	387	50
Other, net	—	(1)
Net cash flows from financing activities	394	52
Net change in cash and cash equivalents and restricted cash and cash equivalents	(1)	(203)
Cash and cash equivalents and restricted cash and cash equivalents at beginning of period	46	331
Cash and cash equivalents and restricted cash and cash equivalents at end of period	\$ 45	\$ 128

The accompanying notes are an integral part of these consolidated financial statements.

MIDAMERICAN FUNDING, LLC AND SUBSIDIARIES
NOTES TO CONSOLIDATED FINANCIAL STATEMENTS
(Unaudited)

(1) General

MidAmerican Funding, LLC ("MidAmerican Funding") is an Iowa limited liability company with Berkshire Hathaway Energy Company ("BHE") as its sole member. BHE is a holding company based in Des Moines, Iowa, that owns subsidiaries principally engaged in energy businesses. BHE is a consolidated subsidiary of Berkshire Hathaway Inc. ("Berkshire Hathaway"). MidAmerican Funding's direct, wholly owned subsidiary is MHC Inc. ("MHC"), which constitutes substantially all of MidAmerican Funding's assets, liabilities and business activities except those related to MidAmerican Funding's long-term debt securities. MHC conducts no business other than the ownership of its subsidiaries. MHC's principal subsidiary is MidAmerican Energy Company ("MidAmerican Energy"), a public utility with electric and natural gas operations, and its direct, wholly owned nonregulated subsidiary is Midwest Capital Group, Inc.

The unaudited Consolidated Financial Statements have been prepared in accordance with accounting principles generally accepted in the United States of America ("GAAP") for interim financial information and the United States Securities and Exchange Commission's rules and regulations for Form 10-Q and Article 10 of Regulation S-X. Accordingly, they do not include all of the disclosures required by GAAP for annual financial statements. Management believes the unaudited Consolidated Financial Statements contain all adjustments (consisting only of normal recurring adjustments) considered necessary for the fair presentation of the unaudited Consolidated Financial Statements as of March 31, 2021, and for the three-month periods ended March 31, 2021 and 2020. The Consolidated Statements of Comprehensive Income have been omitted as net income materially equals comprehensive income for the three-month period ended March 31, 2021 and 2020. The results of operations for the three-month periods ended March 31, 2021, are not necessarily indicative of the results to be expected for the full year.

The preparation of the unaudited Consolidated Financial Statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the unaudited Consolidated Financial Statements and the reported amounts of revenue and expenses during the period. Actual results may differ from the estimates used in preparing the unaudited Consolidated Financial Statements. Note 2 of Notes to Consolidated Financial Statements included in MidAmerican Funding's Annual Report on Form 10-K for the year ended December 31, 2020, describes the most significant accounting policies used in the preparation of the unaudited Consolidated Financial Statements. There have been no significant changes in MidAmerican Funding's assumptions regarding significant accounting estimates and policies during the three-month period ended March 31, 2021.

(2) Cash and Cash Equivalents and Restricted Cash and Cash Equivalents

Cash equivalents consist of funds invested in money market mutual funds, United States Treasury Bills and other investments with a maturity of three months or less when purchased. Cash and cash equivalents exclude amounts where availability is restricted by legal requirements, loan agreements or other contractual provisions. Restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, consist substantially of funds restricted for wildlife preservation and, as of December 31, 2020, the purpose of constructing solid waste facilities under tax-exempt bond obligation agreements. A reconciliation of cash and cash equivalents and restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, as presented in the Consolidated Statements of Cash Flows is outlined below and disaggregated by the line items in which they appear on the Consolidated Balance Sheets (in millions):

	As of	
	March 31, 2021	December 31, 2020
Cash and cash equivalents	\$ 38	\$ 39
Restricted cash and cash equivalents in other current assets	7	7
Total cash and cash equivalents and restricted cash and cash equivalents	<u>\$ 45</u>	<u>\$ 46</u>

(3) Property, Plant and Equipment, Net

Refer to Note 3 of MidAmerican Energy's Notes to Financial Statements.

(4) Regulatory Matters

Refer to Note 4 of MidAmerican Energy's Notes to Financial Statements.

(5) Income Taxes

The effective income tax rate for the three-month period ended March 31, 2021, is 1,300% and results from a \$156 million income tax benefit associated with a \$12 million pre-tax loss. The \$156 million income tax benefit is primarily comprised of a \$3 million benefit (21%) from the application of the statutory income tax rate to the pre-tax loss and a \$168 million benefit (1,400%) from income tax credits, partially offset by a \$13 million expense (108%) from the effects of ratemaking.

A reconciliation of the federal statutory income tax rate to MidAmerican Funding's effective income tax rate applicable to income before income tax benefit is as follows:

	Three-Month Periods Ended March 31,	
	2021	2020
Federal statutory income tax rate	21 %	21 %
Income tax credits	1,400	(463)
State income tax, net of federal income tax impacts	(8)	(31)
Effects of ratemaking	(108)	(3)
Other, net	(5)	(1)
Effective income tax rate	<u>1,300 %</u>	<u>(477)%</u>

Income tax credits relate primarily to production tax credits ("PTCs") from MidAmerican Energy's wind-powered generating facilities. Federal renewable electricity PTCs are earned as energy from qualifying wind-powered generating facilities is produced and sold and are based on a per-kilowatt hour rate pursuant to the applicable federal income tax law. MidAmerican Funding recognizes its renewable electricity PTCs throughout the year based on when the credits are earned and excludes them from the annual effective tax rate that is the basis for the interim recognition of other income tax expense. Wind-powered generating facilities are eligible for the credits for 10 years from the date the qualifying generating facilities are placed in-service. PTCs for the three-month periods ended March 31, 2021 and 2020 totaled \$151 million and \$120 million, respectively.

Berkshire Hathaway includes BHE and subsidiaries in its United States federal and Iowa state income tax returns. Consistent with established regulatory practice, MidAmerican Funding's and MidAmerican Energy's provisions for income tax have been computed on a stand-alone basis, and substantially all of their currently payable or receivable income tax is remitted to or received from BHE. The timing of MidAmerican Funding's income tax cash flows from period to period can be significantly affected by the estimated federal income tax payment methods and assumptions for each payment date. MidAmerican Funding made no cash payments for income tax to BHE for the three-month period ended March 31, 2021, and made net cash payments for income tax to BHE totaling \$47 million for the three-month period ended March 31, 2020.

(6) Employee Benefit Plans

Refer to Note 6 of MidAmerican Energy's Notes to Financial Statements.

(7) Fair Value Measurements

Refer to Note 7 of MidAmerican Energy's Notes to Financial Statements. MidAmerican Funding's long-term debt is carried at cost on the Consolidated Financial Statements. The fair value of MidAmerican Funding's long-term debt is a Level 2 fair value measurement and has been estimated based upon quoted market prices, where available, or at the present value of future cash flows discounted at rates consistent with comparable maturities with similar credit risks. The carrying value of MidAmerican Funding's variable-rate long-term debt approximates fair value because of the frequent repricing of these instruments at market rates. The following table presents the carrying value and estimated fair value of MidAmerican Funding's long-term debt (in millions):

	As of March 31, 2021		As of December 31, 2020	
	Carrying Value	Fair Value	Carrying Value	Fair Value
Long-term debt	<u>\$ 7,464</u>	<u>\$ 8,622</u>	<u>\$ 7,450</u>	<u>\$ 9,466</u>

(8) Commitments and Contingencies

MidAmerican Funding is party to a variety of legal actions arising out of the normal course of business. Plaintiffs occasionally seek punitive or exemplary damages. MidAmerican Funding does not believe that such normal and routine litigation will have a material impact on its consolidated financial results.

Refer to Note 8 of MidAmerican Energy's Notes to Financial Statements.

(9) Revenue from Contracts with Customers

Refer to Note 9 of MidAmerican Energy's Notes to Financial Statements. Additionally, MidAmerican Funding had other Accounting Standards Codification Topic 606 revenue of \$— million and \$5 million for the three-month periods ended March 31, 2021 and 2020, respectively.

(10) Segment Information

MidAmerican Funding has identified two reportable segments: regulated electric and regulated natural gas. The regulated electric segment derives most of its revenue from regulated retail sales of electricity to residential, commercial, and industrial customers and from wholesale sales. The regulated natural gas segment derives most of its revenue from regulated retail sales of natural gas to residential, commercial, and industrial customers and also obtains revenue by transporting natural gas owned by others through its distribution system. Pricing for regulated electric and regulated natural gas sales are established separately by regulatory agencies; therefore, management also reviews each segment separately to make decisions regarding allocation of resources and in evaluating performance. Common operating costs, interest income, interest expense and income tax expense are allocated to each segment based on certain factors, which primarily relate to the nature of the cost. "Other" in the tables below consists of the financial results and assets of nonregulated operations, MHC and MidAmerican Funding.

The following tables provide information on a reportable segment basis (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Operating revenue:		
Regulated electric	\$ 545	\$ 471
Regulated natural gas	512	209
Other	10	6
Total operating revenue	<u>\$ 1,067</u>	<u>\$ 686</u>
Operating income:		
Regulated electric	\$ 9	\$ 59
Regulated natural gas	39	39
Other	—	4
Total operating income	48	102
Interest expense	(78)	(81)
Allowance for borrowed funds	2	3
Allowance for equity funds	6	8
Other, net	10	(6)
(Loss) income before income tax benefit	<u>\$ (12)</u>	<u>\$ 26</u>
	As of	
	March 31, 2021	December 31, 2020
Assets⁽¹⁾:		
Regulated electric	\$ 21,463	\$ 21,083
Regulated natural gas	1,804	1,623
Other	7	5
Total assets	<u>\$ 23,274</u>	<u>\$ 22,711</u>

(1) Assets by reportable segment reflect the assignment of goodwill to applicable reporting units.

Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations

The following is management's discussion and analysis of certain significant factors that have affected the consolidated financial condition and results of operations of MidAmerican Funding and its subsidiaries and MidAmerican Energy during the periods included herein. Information in Management's Discussion and Analysis related to MidAmerican Energy, whether or not segregated, also relates to MidAmerican Funding. Information related to other subsidiaries of MidAmerican Funding pertains only to the discussion of the financial condition and results of operations of MidAmerican Funding. Where necessary, discussions have been segregated under the heading "MidAmerican Funding" to allow the reader to identify information applicable only to MidAmerican Funding. Explanations include management's best estimate of the impact of weather, customer growth, usage trends and other factors. This discussion should be read in conjunction with MidAmerican Funding's historical unaudited Consolidated Financial Statements and Notes to Consolidated Financial Statements and MidAmerican Energy's historical unaudited Financial Statements and Notes to Financial Statements in Part I, Item 1 of this Form 10-Q. MidAmerican Funding's and MidAmerican Energy's actual results in the future could differ significantly from the historical results.

Results of Operations for the First Quarter of 2021 and 2020

Overview

MidAmerican Energy -

MidAmerican Energy's net income for the first quarter of 2021 was \$147 million, a decrease of \$4 million, or 3%, compared to 2020 primarily due to higher depreciation and amortization expense of \$31 million from additional assets placed in-service and the expiration of a regulatory mechanism deferring certain depreciation expense, and higher operations and maintenance expenses of \$28 million, partially offset by a greater income tax benefit of \$31 million from higher PTCs recognized, higher investment earnings of \$19 million and higher company-retained margins of \$9 million on natural gas wholesale sales. PTCs recognized increased due to higher wind-powered generation driven primarily by new wind projects placed in-service.

MidAmerican Funding -

MidAmerican Funding's net income for the first quarter of 2021 was \$144 million, a decrease of \$6 million, or 4%, compared to 2020. The decrease was primarily due to the changes in MidAmerican Energy's earnings discussed above.

Non-GAAP Financial Measure

Management utilizes various key financial measures that are prepared in accordance with GAAP, as well as non-GAAP financial measures such as, electric utility margin and natural gas utility margin, to help evaluate results of operations. Electric utility margin is calculated as regulated electric operating revenue less cost of fuel and energy, which are captions presented on the Statements of Operations. Natural gas utility margin is calculated as regulated natural gas operating revenue less regulated cost of natural gas purchased for resale, which are included in regulated natural gas and other and cost of natural gas purchased for resale and other, respectively, on the Statements of Operations.

MidAmerican Energy's cost of fuel and energy and cost of natural gas purchased for resale are generally recovered from its retail customers through regulatory recovery mechanisms, and as a result, changes in MidAmerican Energy's expense included in regulatory recovery mechanisms result in comparable changes to revenue. As such, management believes electric utility margin and natural gas utility margin more appropriately and concisely explain profitability rather than a discussion of revenue and cost of sales separately. Management believes the presentation of electric utility margin and natural gas utility margin provides meaningful and valuable insight into the information management considers important to running the business and a measure of comparability to others in the industry.

Electric utility margin and natural gas utility margin are not measures calculated in accordance with GAAP and should be viewed as a supplement to, and not a substitute for, operating income, which is the most comparable financial measure prepared in accordance with GAAP. The following table provides a reconciliation of utility margin to MidAmerican Energy's operating income (in millions):

	First Quarter			
	2021	2020	Change	
Electric utility margin:				
Operating revenue	\$ 545	\$ 471	\$ 74	16 %
Cost of fuel and energy	151	80	71	89
Electric utility margin	<u>394</u>	<u>391</u>	<u>3</u>	<u>1 %</u>
Natural gas utility margin:				
Operating revenue	512	209	303	145 %
Natural gas purchased for resale	432	128	304	238
Natural gas utility margin	<u>80</u>	<u>81</u>	<u>(1)</u>	<u>(1)%</u>
Utility margin	474	472	2	— %
Other operating revenue	10	1	9	*
Operations and maintenance	193	165	28	17
Depreciation and amortization	207	176	31	18
Property and other taxes	36	34	2	6
Operating income	<u>\$ 48</u>	<u>\$ 98</u>	<u>\$ (50)</u>	<u>(51)%</u>

Electric Utility Margin

A comparison of key operating results related to electric utility margin is as follows for the quarters ended March 31:

	First Quarter			
	2021	2020	Change	
Utility margin (in millions):				
Operating revenue	\$ 545	\$ 471	\$ 74	16 %
Cost of fuel and energy	151	80	71	89
Utility margin	<u>\$ 394</u>	<u>\$ 391</u>	<u>\$ 3</u>	1 %
Sales (GWhs):				
Residential	1,738	1,668	70	4 %
Commercial	938	969	(31)	(3)
Industrial	3,819	3,524	295	8
Other	370	385	(15)	(4)
Total retail	6,865	6,546	319	5
Wholesale	4,051	2,434	1,617	66
Total sales	<u>10,916</u>	<u>8,980</u>	<u>1,936</u>	22 %
Average number of retail customers (in thousands)	801	792	9	1 %
Average revenue per MWh:				
Retail	\$ 65.82	\$ 62.75	\$ 3.07	5 %
Wholesale	\$ 16.64	\$ 15.71	\$ 0.93	6 %
Heating degree days	3,211	2,952	259	9 %
Sources of energy (GWhs) ⁽¹⁾ :				
Wind and other ⁽²⁾	6,122	4,846	1,276	26 %
Coal	2,902	1,573	1,329	84
Nuclear	895	993	(98)	(10)
Natural gas	143	116	27	23
Total energy generated	10,062	7,528	2,534	34
Energy purchased	1,018	1,643	(625)	(38)
Total	<u>11,080</u>	<u>9,171</u>	<u>1,909</u>	21 %
Average cost of energy per MWh:				
Energy generated ⁽³⁾	\$ 6.15	\$ 5.00	\$ 1.15	23 %
Energy purchased	\$ 87.45	\$ 25.59	\$ 61.86	*

* Not meaningful.

- (1) GWh amounts are net of energy used by the related generating facilities.
- (2) All or some of the renewable energy attributes associated with generation from these generating facilities may be: (a) used in future years to comply with RPS or other regulatory requirements or (b) sold to third parties in the form of RECs or other environmental commodities.
- (3) The average cost per MWh of energy generated includes only the cost of fuel associated with the generating facilities.

Natural Gas Utility Margin

A comparison of key operating results related to natural gas utility margin is as follows for the quarters ended March 31:

	First Quarter			
	2021	2020	Change	
Utility margin (in millions):				
Operating revenue	\$ 512	\$ 209	\$ 303	*
Natural gas purchased for resale	432	128	304	*
Utility margin	<u>\$ 80</u>	<u>\$ 81</u>	<u>\$ (1)</u>	(1) %
Throughput (000's Dths):				
Residential	25,282	23,910	1,372	6 %
Commercial	11,733	10,951	782	7
Industrial	1,437	1,512	(75)	(5)
Other	37	35	2	6
Total retail sales	38,489	36,408	2,081	6
Wholesale sales	10,773	12,910	(2,137)	(17)
Total sales	49,262	49,318	(56)	—
Natural gas transportation service	29,640	34,954	(5,314)	(15)
Total throughput	<u>78,902</u>	<u>84,272</u>	<u>(5,370)</u>	(6) %
Average number of retail customers (in thousands)				
	777	770	7	1 %
Average revenue per retail Dth sold				
	\$ 11.70	\$ 4.85	\$ 6.85	*
Heating degree days				
	3,301	3,067	234	8 %
Average cost of natural gas per retail Dth sold				
	\$ 9.87	\$ 2.91	\$ 6.96	*
Combined retail and wholesale average cost of natural gas per Dth sold				
	\$ 8.76	\$ 2.60	\$ 6.16	*

* Not meaningful.

Quarter Ended March 31, 2021 Compared to Quarter Ended March 31, 2020

MidAmerican Energy -

Electric utility margin increased \$3 million for the first quarter of 2021 compared to 2020, due to:

- a \$15 million increase in retail utility margin due to an increase of \$6 million, net of energy costs, from higher recoveries through bill riders (offset in operations and maintenance expense and income tax benefit); an increase of \$6 million from the favorable impact of weather; and an increase of \$4 million due to price impacts from changes in sales mix and other rate and usage variances, including increased usage for certain industrial customers; partially offset by
- a \$12 million decrease in wholesale utility margin due to lower margins per unit, reflecting higher energy costs, partially offset by higher sales volumes of 66.4%.

Natural gas utility margin decreased \$1 million for the first quarter of 2021 compared to 2020 primarily due to:

- a \$7 million decrease from higher rider refunds related to the ratemaking treatment of 2017 Tax Reform (offset in income tax benefit); partially offset by
- \$3 million from higher natural gas energy efficiency program revenue (offset in operations and maintenance expense); and
- \$2 million from the favorable impact of weather.

Operations and maintenance increased \$28 million for the first quarter of 2021 compared to 2020 primarily due to higher generation operations and maintenance expenses of \$6 million due to additional wind turbines and easements, higher electric and natural gas distribution costs of \$6 million, higher energy efficiency program expense of \$5 million (offset in operating revenue) and higher employee-related expenses of \$5 million.

Depreciation and amortization for the first quarter of 2021 increased \$31 million compared to 2020 primarily due to wind-powered generating facilities and other plant placed in-service and \$13 million from the expiration of a regulatory mechanism deferring certain depreciation expense.

Interest expense decreased \$2 million for the first quarter of 2021 compared to 2020 due to lower average interest rates on variable rate long-term debt.

Allowance for borrowed and equity funds decreased \$3 million for the first quarter of 2021 compared to 2020 primarily due to lower construction work-in-progress balances related to wind-powered generation.

Other, net increased \$16 million for the first quarter of 2021 compared to 2020 primarily due to higher cash surrender values of corporate-owned life insurance policies.

Income tax benefit increased \$31 million for the first quarter of 2021 compared to 2020, and the effective tax rate was 2,200% for 2021 and (439)% for 2020. The change in the effective tax rates for 2021 compared to 2020 was due to the higher PTCs and a lower pretax income, partially offset by the effects of ratemaking and state income tax impacts.

Federal renewable electricity PTCs are earned as energy from qualifying wind-powered generating facilities is produced and sold and are based on a per-kilowatt hour rate pursuant to the applicable federal income tax law. Wind-powered generating facilities, including those facilities where a significant portion of the equipment was replaced, commonly referred to as repowered facilities, are eligible for the credits for 10 years from the date the qualifying generating facilities are placed in-service. PTCs for the first quarter of 2021 and 2020 totaled \$151 million and \$120 million, respectively.

MidAmerican Funding -

Income tax benefit increased \$32 million for the first quarter of 2021 compared to 2020, and the effective tax rate was 1,300% for 2021 and (477)% for 2020. The changes in the effective tax rates were principally due to the factors discussed for MidAmerican Energy.

Liquidity and Capital Resources

As of March 31, 2021, the total net liquidity for MidAmerican Energy and MidAmerican Funding was as follows (in millions):

MidAmerican Energy:

Cash and cash equivalents	\$ 37
Credit facilities, maturing 2021 and 2022	1,505
Less:	
Short-term debt outstanding	(387)
Tax-exempt bond support	(370)
Net credit facilities	748
MidAmerican Energy total net liquidity	\$ 785

MidAmerican Funding:

MidAmerican Energy total net liquidity	\$ 785
Cash and cash equivalents	1
MHC, Inc. credit facility, maturing 2021	4
MidAmerican Funding total net liquidity	\$ 790

Operating Activities

MidAmerican Energy's net cash flows from operating activities for the three-month periods ended March 31, 2021 and 2020, were \$(85) million and \$219 million, respectively. MidAmerican Funding's net cash flows from operating activities for the three-month periods ended March 31, 2021 and 2020, were \$(92) million and \$214 million, respectively. Cash flows from operating activities reflect lower cash margins for MidAmerican Energy's regulated electric and natural gas businesses, including delayed recovery of higher natural gas costs in February 2021, discussed below, and higher payments to vendors.

In February 2021, severe cold weather over the central United States caused disruptions in natural gas supply from the southern part of the United States. These disruptions, combined with increased demand, resulted in historically high prices for natural gas purchased for resale to MidAmerican Energy's retail customers and caused an approximate \$245 million increase in natural gas costs above those normally expected. To mitigate the impact to MidAmerican Energy's customers, the IUB ordered the recovery of these higher costs to be applied to sales over the period April 2021 through April 2022. While sufficient liquidity is available to MidAmerican Energy, the increased costs and longer recovery period resulted in higher working capital requirements during three-month period ended March 31, 2021.

The timing of MidAmerican Energy's income tax cash flows from period to period can be significantly affected by the estimated federal income tax payment methods and assumptions for each payment date.

Investing Activities

MidAmerican Energy's net cash flows from investing activities for the three-month periods ended March 31, 2021 and 2020, were \$(303) million and \$(470) million, respectively. MidAmerican Funding's net cash flows from investing activities for the three-month periods ended March 31, 2021 and 2020, were \$(303) million and \$(469) million, respectively. Net cash flows from investing activities consist almost entirely of capital expenditures, which decreased primarily due to lower wind-powered generating facility construction expenditures. Purchases and proceeds related to marketable securities substantially consist of activity within the Quad Cities Generating Station nuclear decommissioning trust and other trust investments.

Financing Activities

MidAmerican Energy's net cash flows from financing activities for the three-month periods ended March 31, 2021 and 2020 were \$387 million and \$49 million, respectively. MidAmerican Funding's net cash flows from financing activities for the three-month periods ended March 31, 2021 and 2020, were \$394 million and \$52 million, respectively. Through its commercial paper program, MidAmerican Energy received \$387 million in 2021 and \$50 million in 2020. MidAmerican Funding received \$7 million and \$3 million in 2021 and 2020, respectively, through its note payable with BHE.

Debt Authorizations and Related Matters

MidAmerican Energy has authority from the FERC to issue, through April 2, 2022, commercial paper and bank notes aggregating \$1.5 billion at interest rates not to exceed the applicable London Interbank Offered Rate plus a spread of 400 basis points. MidAmerican Energy has a \$900 million unsecured credit facility expiring in June 2022. The credit facility, which supports MidAmerican Energy's commercial paper program and its variable-rate tax-exempt bond obligations and provides for the issuance of letters of credit, has a variable interest rate based on the Eurodollar rate or a base rate, at MidAmerican Energy's option, plus a spread that varies based on MidAmerican Energy's credit ratings for senior unsecured long-term debt securities. MidAmerican Energy has a \$600 million unsecured credit facility, which, following MidAmerican Energy's exercise of an option to extend the facility, expires in August 2021, and has a variable interest rate based on the Eurodollar rate or a base rate, at MidAmerican Energy's option, plus a spread. Additionally, MidAmerican Energy has a \$5 million unsecured credit facility for general corporate purposes.

MidAmerican Energy currently has an effective automatic registration statement with the SEC to issue an indeterminate amount of long-term debt securities through June 26, 2021. Additionally, MidAmerican Energy has authorization from the FERC to issue, through June 30, 2021, long-term debt securities up to an aggregate of \$850 million at interest rates not to exceed the applicable United States Treasury rate plus a spread of 175 basis points and preferred stock up to an aggregate of \$500 million and from the ICC to issue long-term debt securities up to an aggregate of \$850 million through August 20, 2022.

Future Uses of Cash

MidAmerican Energy and MidAmerican Funding have available a variety of sources of liquidity and capital resources, both internal and external, including net cash flows from operating activities, public and private debt offerings, the issuance of commercial paper, the use of unsecured revolving credit facilities and other sources. These sources are expected to provide funds required for current operations, capital expenditures, debt retirements and other capital requirements. The availability and terms under which MidAmerican Energy and MidAmerican Funding have access to external financing depends on a variety of factors, including regulatory approvals, their credit ratings, investors' judgment of risk and conditions in the overall capital markets, including the condition of the utility industry.

Capital Expenditures

MidAmerican Energy has significant future capital requirements. Capital expenditure needs are reviewed regularly by management and may change significantly as a result of these reviews, which may consider, among other factors, impacts to customers' rates; changes in environmental and other rules and regulations; outcomes of regulatory proceedings; changes in income tax laws; general business conditions; load projections; system reliability standards; the cost and efficiency of construction labor, equipment and materials; commodity prices; and the cost and availability of capital.

MidAmerican Energy's historical and forecast capital expenditures, each of which exclude amounts for non-cash equity AFUDC and other non-cash items, are as follows (in millions):

	Three-Month Periods		Annual
	Ended March 31,		Forecast
	2020	2021	2021
Wind generation	\$ 166	\$ 32	\$ 865
Electric distribution	51	46	298
Electric transmission	38	23	197
Solar generation	—	3	245
Other	217	194	595
Total	<u>\$ 472</u>	<u>\$ 298</u>	<u>\$ 2,200</u>

MidAmerican Energy's capital expenditures provided above consist of the following:

- Wind generation includes the construction, acquisition, repowering and operation of wind-powered generating facilities in Iowa.
 - Construction and acquisition of wind-powered generating facilities totaled \$154 million for 2020. MidAmerican Energy's forecast expenditures in 2021 for the construction of additional wind-powered generating facilities total \$391 million and include 202 MWs of wind-powered generating facilities expected to be placed in-service in 2021.
 - Repowering of wind-powered generating facilities totaled \$24 million for 2021 and \$6 million for 2020. Planned spending for repowering generating facilities totals \$379 million for the remainder of 2021. MidAmerican Energy expects its repowered facilities to meet Internal Revenue Service guidelines for the re-establishment of PTCs for 10 years from the date the facilities are placed in-service. The rate at which PTCs are re-established for a facility depends upon the date construction begins. Of the 1,078 MWs of current repowering projects not in-service as of March 31, 2021, 80 MWs are currently expected to qualify for 100% of the PTCs available for 10 years following each facility's return to service, 591 MWs are expected to qualify for 80% of such credits and 407 MWs are expected to qualify for 60% of such credits.
- Electric distribution includes expenditures for new facilities to meet retail demand growth and for replacement of existing facilities to maintain system reliability.
- Electric transmission includes expenditures to meet retail demand growth, upgrades to accommodate third-party generator requirements and replacement of existing facilities to maintain system reliability.
- Solar reflects MidAmerican Energy's current plan for the construction of 117 MWs of small- and utility-scale solar generation during 2021, of which 37 MWs are expected to be placed in-service in 2021.
- Remaining expenditures primarily relate to routine expenditures for other generation, natural gas distribution, technology, facilities and other operational needs to serve existing and expected demand.

Contractual Obligations

As of March 31, 2021, there have been no material changes outside the normal course of business in MidAmerican Energy's and MidAmerican Funding's contractual obligations from the information provided in Item 7 of their Annual Report on Form 10-K for the year ended December 31, 2020.

Quad Cities Generating Station Operating Status

Exelon Generation Company, LLC ("Exelon Generation"), the operator of Quad Cities Generating Station Units 1 and 2 ("Quad Cities Station") of which MidAmerican Energy has a 25% ownership interest, announced on June 2, 2016, its intention to shut down Quad Cities Station on June 1, 2018. In December 2016, Illinois passed legislation creating a zero emission standard, which went into effect June 1, 2017. The zero emission standard requires the Illinois Power Agency to purchase zero emission credits ("ZECs") and recover the costs from certain ratepayers in Illinois, subject to certain limitations. The proceeds from the ZECs will provide Exelon Generation additional revenue through 2027 as an incentive for continued operation of Quad Cities Station. MidAmerican Energy will not receive additional revenue from the subsidy.

The PJM Interconnection, L.L.C. ("PJM") capacity market includes a Minimum Offer Price Rule ("MOPR"). If a generation resource is subjected to a MOPR, its offer price in the market is adjusted to effectively remove the revenues it receives through a government-provided financial support program, resulting in a higher offer that may not clear the capacity market. Prior to December 19, 2019, the PJM MOPR applied only to certain new gas-fired resources. An expanded PJM MOPR to include existing resources would require exclusion of ZEC compensation when bidding into future capacity auctions, resulting in an increased risk of Quad Cities Station not receiving capacity revenues in future auctions.

On December 19, 2019, the FERC issued an order requiring the PJM to broadly apply the MOPR to all new and existing resources, including nuclear. This greatly expands the breadth and scope of the PJM's MOPR, which is effective as of the PJM's next capacity auction. While the FERC included some limited exemptions in its order, no exemptions were available to state-supported nuclear resources, such as Quad Cities Station. The FERC provided no new mechanism for accommodating state-supported resources other than the existing Fixed Resource Requirement ("FRR") mechanism under which an entire utility zone would be removed from PJM's capacity auction along with sufficient resources to support the load in such zone. In response to the FERC's order, the PJM submitted a compliance filing on March 18, 2020, wherein the PJM proposed tariff language reflecting the FERC's directives and a schedule for resuming capacity auctions. On April 16, 2020, the FERC issued an order largely denying requests for rehearing of the FERC's December 2019 order but granting a few clarifications that required an additional PJM compliance filing, which the PJM submitted on June 1, 2020. On October 15, 2020, the FERC issued an order denying requests for rehearing of its April 16, 2020 order and accepting the PJM's two compliance filings, subject to a further compliance filing to revise minor aspects of the proposed MOPR methodology. As part of that order, the FERC also accepted the PJM's proposal to condense the schedule of activities leading up to the next capacity auction but did not specify when that schedule would commence given that a key element of the MOPR level computation remains pending before the FERC in another proceeding. In November 2020, the PJM announced that the next capacity auction will be conducted in May 2021.

On May 21, 2020, the FERC issued an order involving reforms to the PJM's day-ahead and real-time reserves markets that need to be reflected in the calculation of MOPR levels. In approving reforms to the PJM's reserves markets, the FERC also directed the PJM to develop a new methodology for estimating revenues that resources will receive for sales of energy and related services, which will then be used in calculating a number of parameters and assumptions used in the capacity market, including MOPR levels. The PJM submitted its new revenue projection methodology on August 5, 2020. On review of this compliance filing, the FERC is expected to address how these additional reforms will impact MOPR levels, the timeline for implementing the new revenue projection methodology, and the timing for commencing the capacity auction schedule.

Exelon Generation is currently working with the PJM and other stakeholders to pursue the FRR option as an alternative to the next PJM capacity auction. If Illinois implements the FRR option, Quad Cities Station could be removed from the PJM's capacity auction and instead supply capacity and be compensated under the FRR program. If Illinois cannot implement an FRR program in its PJM zones, then the MOPR will apply to Quad Cities Station, resulting in higher offers for its units that may not clear the capacity market. Implementing the FRR program in Illinois will require both legislative and regulatory changes. MidAmerican Energy cannot predict whether or when such legislative and regulatory changes can be implemented or their potential impact on the continued operation of Quad Cities Station.

Regulatory Matters

MidAmerican Energy is subject to comprehensive regulation. Refer to "Regulatory Matters" in Berkshire Hathaway Energy's Part I, Item 2 of this Form 10-Q for discussion regarding MidAmerican Energy's current regulatory matters.

Environmental Laws and Regulations

MidAmerican Energy is subject to federal, state and local laws and regulations regarding climate change, RPS, air and water quality, emissions performance standards, coal combustion byproduct disposal, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact its current and future operations. In addition to imposing continuing compliance obligations and capital expenditure requirements, these laws and regulations provide regulators with the authority to levy substantial penalties for noncompliance including fines, injunctive relief and other sanctions. These laws and regulations are administered by the EPA and various state and local agencies. All such laws and regulations are subject to a range of interpretation, which may ultimately be resolved by the courts. Environmental laws and regulations continue to evolve, and MidAmerican Energy is unable to predict the impact of the changing laws and regulations on its operations and consolidated financial results. MidAmerican Energy believes it is in material compliance with all applicable laws and regulations.

Refer to "Environmental Laws and Regulations" in Berkshire Hathaway Energy's Part I, Item 2 of this Form 10-Q for additional information regarding environmental laws and regulations.

Critical Accounting Estimates

Certain accounting measurements require management to make estimates and judgments concerning transactions that will be settled several years in the future. Amounts recognized on the Financial Statements based on such estimates involve numerous assumptions subject to varying and potentially significant degrees of judgment and uncertainty and will likely change in the future as additional information becomes available. Estimates are used for, but not limited to, the accounting for the effects of certain types of regulation, derivatives, impairment of goodwill and long-lived assets, pension and other postretirement benefits, income taxes and revenue recognition - unbilled revenue. For additional discussion of MidAmerican Energy's and MidAmerican Funding's critical accounting estimates, see Item 7 of their Annual Report on Form 10-K for the year ended December 31, 2020. There have been no significant changes in MidAmerican Energy's and MidAmerican Funding's assumptions regarding critical accounting estimates since December 31, 2020.

Nevada Power Company and its subsidiaries
Consolidated Financial Section

PART I

Item 1. Financial Statements

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors and Shareholder of
Nevada Power Company

Results of Review of Interim Financial Information

We have reviewed the accompanying consolidated balance sheet of Nevada Power Company and subsidiaries ("Nevada Power") as of March 31, 2021, the related consolidated statements of operations, changes in shareholder's equity and cash flows for the three-month periods ended March 31, 2021 and 2020, and the related notes (collectively referred to as the "interim financial information"). Based on our reviews, we are not aware of any material modifications that should be made to the accompanying interim financial information for it to be in conformity with accounting principles generally accepted in the United States of America.

We have previously audited, in accordance with the standards of the Public Company Accounting Oversight Board (United States) (PCAOB), the consolidated balance sheet of Nevada Power as of December 31, 2020, and the related consolidated statements of operations, changes in shareholder's equity, and cash flows for the year then ended (not presented herein); and in our report dated February 26, 2021, we expressed an unqualified opinion on those consolidated financial statements. In our opinion, the information set forth in the accompanying consolidated balance sheet as of December 31, 2020, is fairly stated, in all material respects, in relation to the consolidated balance sheet from which it has been derived.

Basis for Review Results

This interim financial information is the responsibility of Nevada Power's management. We are a public accounting firm registered with the PCAOB and are required to be independent with respect to Nevada Power in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our reviews in accordance with standards of the PCAOB. A review of interim financial information consists principally of applying analytical procedures and making inquiries of persons responsible for financial and accounting matters. It is substantially less in scope than an audit conducted in accordance with the standards of the PCAOB, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, we do not express such an opinion.

/s/ Deloitte & Touche LLP

Las Vegas, Nevada
April 30, 2021

NEVADA POWER COMPANY AND SUBSIDIARIES
CONSOLIDATED BALANCE SHEETS (Unaudited)
(Amounts in millions, except share data)

	As of	
	March 31, 2021	December 31, 2020
ASSETS		
Current assets:		
Cash and cash equivalents	\$ 92	\$ 25
Trade receivables, net	180	234
Inventories	65	69
Derivative contracts	48	26
Regulatory assets	22	48
Prepayments	45	38
Other current assets	37	26
Total current assets	489	466
Property, plant and equipment, net	6,751	6,701
Finance lease right of use assets, net	348	351
Regulatory assets	741	746
Other assets	71	72
Total assets	\$ 8,400	\$ 8,336
LIABILITIES AND SHAREHOLDER'S EQUITY		
Current liabilities:		
Accounts payable	\$ 189	\$ 181
Accrued interest	38	32
Accrued property, income and other taxes	38	25
Current portion of finance lease obligations	30	27
Regulatory liabilities	63	50
Customer deposits	42	47
Asset retirement obligation	18	25
Other current liabilities	38	22
Total current liabilities	456	409
Long-term debt	2,497	2,496
Finance lease obligations	328	334
Regulatory liabilities	1,171	1,163
Deferred income taxes	740	738
Other long-term liabilities	267	257
Total liabilities	5,459	5,397
Commitments and contingencies (Note 6)		
Shareholder's equity:		
Common stock - \$1.00 stated value; 1,000 shares authorized, issued and outstanding	—	—
Additional paid-in capital	2,308	2,308
Retained earnings	636	634
Accumulated other comprehensive loss, net	(3)	(3)
Total shareholder's equity	2,941	2,939
Total liabilities and shareholder's equity	\$ 8,400	\$ 8,336

The accompanying notes are an integral part of the consolidated financial statements.

NEVADA POWER COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF OPERATIONS (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Operating revenue	\$ 370	\$ 389
Operating expenses:		
Cost of fuel and energy	165	170
Operations and maintenance	63	82
Depreciation and amortization	101	90
Property and other taxes	12	12
Total operating expenses	341	354
Operating income	29	35
Other income (expense):		
Interest expense	(38)	(42)
Allowance for borrowed funds	1	1
Allowance for equity funds	1	2
Other, net	9	(1)
Total other income (expense)	(27)	(40)
Income (loss) before income tax benefit	2	(5)
Income tax benefit	—	(1)
Net income (loss)	\$ 2	\$ (4)

The accompanying notes are an integral part of these consolidated financial statements.

NEVADA POWER COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CHANGES IN SHAREHOLDER'S EQUITY (Unaudited)
(Amounts in millions, except shares)

	Common Stock		Additional	Retained	Accumulated	Total
	Shares	Amount	Paid-in	Earnings	Other	Shareholder's
			Capital		Comprehensive	Equity
					Loss, Net	
Balance, December 31, 2019	1,000	\$ —	\$ 2,308	\$ 493	\$ (4)	\$ 2,797
Net loss	—	—	—	(4)	—	(4)
Other equity transactions	—	—	—	1	—	1
Balance, March 31, 2020	<u>1,000</u>	<u>\$ —</u>	<u>\$ 2,308</u>	<u>\$ 490</u>	<u>\$ (4)</u>	<u>\$ 2,794</u>
Balance, December 31, 2020	1,000	\$ —	\$ 2,308	\$ 634	\$ (3)	\$ 2,939
Net income	—	—	—	2	—	2
Balance, March 31, 2021	<u>1,000</u>	<u>\$ —</u>	<u>\$ 2,308</u>	<u>\$ 636</u>	<u>\$ (3)</u>	<u>\$ 2,941</u>

The accompanying notes are an integral part of these consolidated financial statements.

NEVADA POWER COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CASH FLOWS (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Cash flows from operating activities:		
Net income (loss)	\$ 2	\$ (4)
Adjustments to reconcile net income (loss) to net cash flows from operating activities:		
Depreciation and amortization	101	90
Allowance for equity funds	(1)	(2)
Changes in regulatory assets and liabilities	(15)	3
Deferred income taxes and amortization of investment tax credits	(10)	(4)
Deferred energy	41	4
Other, net	(1)	8
Changes in other operating assets and liabilities:		
Trade receivables and other assets	41	32
Inventories	4	(1)
Accrued property, income and other taxes	3	(6)
Accounts payable and other liabilities	14	(41)
Net cash flows from operating activities	<u>179</u>	<u>79</u>
Cash flows from investing activities:		
Capital expenditures	(106)	(111)
Net cash flows from investing activities	<u>(106)</u>	<u>(111)</u>
Cash flows from financing activities:		
Proceeds from long-term debt	—	719
Repayments of long-term debt	—	(575)
Other, net	(5)	(4)
Net cash flows from financing activities	<u>(5)</u>	<u>140</u>
Net change in cash and cash equivalents and restricted cash and cash equivalents	68	108
Cash and cash equivalents and restricted cash and cash equivalents at beginning of period	36	25
Cash and cash equivalents and restricted cash and cash equivalents at end of period	<u>\$ 104</u>	<u>\$ 133</u>

The accompanying notes are an integral part of these consolidated financial statements.

NEVADA POWER COMPANY AND SUBSIDIARIES
NOTES TO CONSOLIDATED FINANCIAL STATEMENTS
(Unaudited)

(1) General

Nevada Power Company, together with its subsidiaries ("Nevada Power"), is a wholly owned subsidiary of NV Energy, Inc. ("NV Energy"), a holding company that also owns Sierra Pacific Power Company and its subsidiaries ("Sierra Pacific") and certain other subsidiaries. Nevada Power is a United States regulated electric utility company serving retail customers, including residential, commercial and industrial customers, primarily in the Las Vegas, North Las Vegas, Henderson and adjoining areas. NV Energy is an indirect wholly owned subsidiary of Berkshire Hathaway Energy Company ("BHE"). BHE is a holding company based in Des Moines, Iowa that owns subsidiaries principally engaged in energy businesses. BHE is a consolidated subsidiary of Berkshire Hathaway Inc. ("Berkshire Hathaway").

The unaudited Consolidated Financial Statements have been prepared in accordance with accounting principles generally accepted in the United States of America ("GAAP") for interim financial information and the United States Securities and Exchange Commission's rules and regulations for Form 10-Q and Article 10 of Regulation S-X. Accordingly, they do not include all of the disclosures required by GAAP for annual financial statements. Management believes the unaudited Consolidated Financial Statements contain all adjustments (consisting only of normal recurring adjustments) considered necessary for the fair presentation of the unaudited Consolidated Financial Statements as of March 31, 2021 and for the three-month periods ended March 31, 2021 and 2020. The Consolidated Statements of Comprehensive Income have been omitted as net income equals comprehensive income for the three-month periods ended March 31, 2021 and 2020. The results of operations for the three-month period ended March 31, 2021 are not necessarily indicative of the results to be expected for the full year.

The preparation of the unaudited Consolidated Financial Statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the unaudited Consolidated Financial Statements and the reported amounts of revenue and expenses during the period. Actual results may differ from the estimates used in preparing the unaudited Consolidated Financial Statements. Note 2 of Notes to Consolidated Financial Statements included in Nevada Power's Annual Report on Form 10-K for the year ended December 31, 2020 describes the most significant accounting policies used in the preparation of the unaudited Consolidated Financial Statements. There have been no significant changes in Nevada Power's assumptions regarding significant accounting estimates and policies during the three-month period ended March 31, 2021.

(2) Cash and Cash Equivalents and Restricted Cash and Cash Equivalents

Cash equivalents consist of funds invested in money market mutual funds, United States Treasury Bills and other investments with a maturity of three months or less when purchased. Cash and cash equivalents exclude amounts where availability is restricted by legal requirements, loan agreements or other contractual provisions. Restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, consist of funds restricted by the Public Utilities Commission of Nevada ("PUCN") for a certain renewable energy contract. A reconciliation of cash and cash equivalents and restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, as presented in the Consolidated Statements of Cash Flows is outlined below and disaggregated by the line items in which they appear on the Consolidated Balance Sheets (in millions):

	As of	
	March 31, 2021	December 31, 2020
Cash and cash equivalents	\$ 92	\$ 25
Restricted cash and cash equivalents included in other current assets	12	11
Total cash and cash equivalents and restricted cash and cash equivalents	<u>\$ 104</u>	<u>\$ 36</u>

(3) Property, Plant and Equipment, Net

Property, plant and equipment, net consists of the following (in millions):

		As of	
	Depreciable Life	March 31, 2021	December 31, 2020
Utility plant:			
Generation	30 - 55 years	\$ 3,691	\$ 3,690
Transmission	45 - 70 years	1,465	1,468
Distribution	20 - 65 years	3,803	3,771
General and intangible plant	5 - 65 years	798	791
Utility plant		9,757	9,720
Accumulated depreciation and amortization		(3,224)	(3,162)
Utility plant, net		6,533	6,558
Other non-regulated, net of accumulated depreciation and amortization	45 years	1	1
Plant, net		6,534	6,559
Construction work-in-progress		217	142
Property, plant and equipment, net		\$ 6,751	\$ 6,701

(4) Employee Benefit Plans

Nevada Power is a participant in benefit plans sponsored by NV Energy. The NV Energy Retirement Plan includes a qualified pension plan ("Qualified Pension Plan") and a supplemental executive retirement plan and a restoration plan (collectively, "Non-Qualified Pension Plans") that provide pension benefits for eligible employees. The NV Energy Comprehensive Welfare Benefit and Cafeteria Plan provides certain postretirement health care and life insurance benefits for eligible retirees ("Other Postretirement Plans") on behalf of Nevada Power. Amounts attributable to Nevada Power were allocated from NV Energy based upon the current, or in the case of retirees, previous, employment location. Offsetting regulatory assets and liabilities have been recorded related to the amounts not yet recognized as a component of net periodic benefit costs that will be included in regulated rates. Net periodic benefit costs not included in regulated rates are included in accumulated other comprehensive loss, net.

Amounts receivable from (payable to) NV Energy are included on the Consolidated Balance Sheets and consist of the following (in millions):

	As of	
	March 31, 2021	December 31, 2020
Qualified Pension Plan:		
Other non-current assets	\$ 9	\$ 8
Non-Qualified Pension Plans:		
Other current liabilities	(1)	(1)
Other long-term liabilities	(9)	(9)
Other Postretirement Plans:		
Other non-current assets	4	4

(5) Fair Value Measurements

The carrying value of Nevada Power's cash, certain cash equivalents, receivables, payables, accrued liabilities and short-term borrowings approximates fair value because of the short-term maturity of these instruments. Nevada Power has various financial assets and liabilities that are measured at fair value on the Consolidated Balance Sheets using inputs from the three levels of the fair value hierarchy. A financial asset or liability classification within the hierarchy is determined based on the lowest level input that is significant to the fair value measurement. The three levels are as follows:

- Level 1 — Inputs are unadjusted quoted prices in active markets for identical assets or liabilities that Nevada Power has the ability to access at the measurement date.
- Level 2 — Inputs include quoted prices for similar assets or liabilities in active markets, quoted prices for identical or similar assets or liabilities in markets that are not active, inputs other than quoted prices that are observable for the asset or liability and inputs that are derived principally from or corroborated by observable market data by correlation or other means (market corroborated inputs).
- Level 3 — Unobservable inputs reflect Nevada Power's judgments about the assumptions market participants would use in pricing the asset or liability since limited market data exists. Nevada Power develops these inputs based on the best information available, including its own data.

The following table presents Nevada Power's assets and liabilities recognized on the Consolidated Balance Sheets and measured at fair value on a recurring basis (in millions):

	Input Levels for Fair Value Measurements			
	Level 1	Level 2	Level 3	Total
As of March 31, 2021				
Assets:				
Commodity derivatives	\$ —	\$ —	\$ 48	\$ 48
Money market mutual funds ⁽¹⁾	86	—	—	86
Investment funds	2	—	—	2
	<u>\$ 88</u>	<u>\$ —</u>	<u>\$ 48</u>	<u>\$ 136</u>
Liabilities - commodity derivatives	<u>\$ —</u>	<u>\$ —</u>	<u>\$ (21)</u>	<u>\$ (21)</u>
As of December 31, 2020				
Assets:				
Commodity derivatives	\$ —	\$ —	\$ 26	\$ 26
Money market mutual funds ⁽¹⁾	21	—	—	21
Investment funds	2	—	—	2
	<u>\$ 23</u>	<u>\$ —</u>	<u>\$ 26</u>	<u>\$ 49</u>
Liabilities - commodity derivatives	<u>\$ —</u>	<u>\$ —</u>	<u>\$ (11)</u>	<u>\$ (11)</u>

- (1) Amounts are included in cash and cash equivalents on the Consolidated Balance Sheets. The fair value of these money market mutual funds approximates cost.

Derivative contracts are recorded on the Consolidated Balance Sheets as either assets or liabilities and are stated at estimated fair value unless they are designated as normal purchases or normal sales and qualify for the exception afforded by GAAP. When available, the fair value of derivative contracts is estimated using unadjusted quoted prices for identical contracts in the market in which Nevada Power transacts. When quoted prices for identical contracts are not available, Nevada Power uses forward price curves. Forward price curves represent Nevada Power's estimates of the prices at which a buyer or seller could contract today for delivery or settlement at future dates. Nevada Power bases its forward price curves upon internally developed models, with internal and external fundamental data inputs. Market price quotations for certain electricity and natural gas trading hubs are not as readily obtainable due to markets that are not active. Given that limited market data exists for these contracts, Nevada Power uses forward price curves derived from internal models based on perceived pricing relationships to major trading hubs that are based on unobservable inputs. The model incorporates a mid-market pricing convention (the mid-point price between bid and ask prices) as a practical expedient for valuing its assets and liabilities measured and reported at fair value. The determination of the fair value for derivative contracts not only includes counterparty risk, but also the impact of Nevada Power's nonperformance risk on its liabilities, which as of March 31, 2021 and December 31, 2020, had an immaterial impact to the fair value of its derivative contracts. As such, Nevada Power considers its derivative contracts to be valued using Level 3 inputs.

Nevada Power's investments in money market mutual funds and investment funds are stated at fair value. When available, a readily observable quoted market price or net asset value of an identical security in an active market is used to record the fair value.

The following table reconciles the beginning and ending balances of Nevada Power's commodity derivative assets and liabilities measured at fair value on a recurring basis using significant Level 3 inputs (in millions):

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Beginning balance	\$ 15	\$ (8)
Changes in fair value recognized in regulatory assets	11	(31)
Settlements	1	1
Ending balance	<u>\$ 27</u>	<u>\$ (38)</u>

Nevada Power's long-term debt is carried at cost on the Consolidated Balance Sheets. The fair value of Nevada Power's long-term debt is a Level 2 fair value measurement and has been estimated based upon quoted market prices, where available, or at the present value of future cash flows discounted at rates consistent with comparable maturities with similar credit risks. The carrying value of Nevada Power's variable-rate long-term debt approximates fair value because of the frequent repricing of these instruments at market rates. The following table presents the carrying value and estimated fair value of Nevada Power's long-term debt (in millions):

	As of March 31, 2021		As of December 31, 2020	
	Carrying Value	Fair Value	Carrying Value	Fair Value
Long-term debt	<u>\$ 2,497</u>	<u>\$ 2,991</u>	<u>\$ 2,496</u>	<u>\$ 3,245</u>

(6) Commitments and Contingencies

Legal Matters

Nevada Power is party to a variety of legal actions arising out of the normal course of business. Plaintiffs occasionally seek punitive or exemplary damages. Nevada Power does not believe that such normal and routine litigation will have a material impact on its consolidated financial results.

Environmental Laws and Regulations

Nevada Power is subject to federal, state and local laws and regulations regarding climate change, renewable portfolio standards, air and water quality, emissions performance standards, coal combustion byproduct disposal, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact Nevada Power's current and future operations. Nevada Power believes it is in material compliance with all applicable laws and regulations.

(7) Revenue from Contracts with Customers

The following table summarizes Nevada Power's revenue from contracts with customers ("Customer Revenue") by customer class (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Customer Revenue:		
Retail:		
Residential	\$ 196	\$ 193
Commercial	84	94
Industrial	63	70
Other	3	3
Total fully bundled	346	360
Distribution only service	5	7
Total retail	351	367
Wholesale, transmission and other	14	16
Total Customer Revenue	365	383
Other revenue	5	6
Total revenue	<u>\$ 370</u>	<u>\$ 389</u>

Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations

The following is management's discussion and analysis of certain significant factors that have affected the consolidated financial condition and results of operations of Nevada Power during the periods included herein. Explanations include management's best estimate of the impact of weather, customer growth, usage trends and other factors. This discussion should be read in conjunction with Nevada Power's historical unaudited Consolidated Financial Statements and Notes to Consolidated Financial Statements in Part I, Item 1 of this Form 10-Q. Nevada Power's actual results in the future could differ significantly from the historical results.

Results of Operations for the First Quarter of 2021 and 2020

Overview

Net income for the first quarter of 2021 was \$2 million, an increase of \$6 million, compared to 2020 primarily due to \$19 million of lower operations and maintenance expenses, primarily due to lower net regulatory instructed deferrals and amortizations of \$11 million, lower plant operations and maintenance costs and a reduction to the accrual for earning sharing, \$10 million of higher other, net, mainly due to higher cash surrender value of corporate-owned life insurance policies of \$7 million and lower pension expense, and lower interest expense of \$4 million. This increase is offset by \$14 million of lower utility margin, primarily due to lower retail rates from the 2020 regulatory rate review with new rates effective January 2021, and \$11 million of higher depreciation and amortization, mainly due to regulatory amortizations approved in the 2020 regulatory rate review effective January 2021 and higher plant placed in service.

Non-GAAP Financial Measure

Management utilizes various key financial measures that are prepared in accordance with GAAP, as well as non-GAAP financial measures such as, utility margin, to help evaluate results of operations. Utility margin is calculated as electric operating revenue less cost of fuel and energy, which are captions presented on the Consolidated Statements of Operations.

Nevada Power's cost of fuel and energy are directly recovered from its customers through regulatory recovery mechanisms and as a result, changes in Nevada Power's expenses result in comparable changes to revenue. As such, management believes utility margin more appropriately and concisely explains profitability rather than a discussion of revenue and cost of sales separately. Management believes the presentation of utility margin provides meaningful and valuable insight into the information management considers important to running the business and a measure of comparability to others in the industry.

Utility margin is not a measure calculated in accordance with GAAP and should be viewed as a supplement to, and not a substitute for, operating income which is the most directly comparable financial measure prepared in accordance with GAAP. The following table provides a reconciliation of utility margin to operating income (in millions):

	First Quarter			
	2021	2020	Change	
Utility margin:				
Operating revenue	\$ 370	\$ 389	\$ (19)	(5)%
Cost of fuel and energy	165	170	(5)	(3)
Utility margin	205	219	(14)	(6)
Operations and maintenance	63	82	(19)	(23)
Depreciation and amortization	101	90	11	12
Property and other taxes	12	12	—	—
Operating income	<u>\$ 29</u>	<u>\$ 35</u>	<u>\$ (6)</u>	(17)%

Utility Margin

A comparison of key operating results related to utility margin is as follows for the quarters ended March 31:

	First Quarter			
	2021	2020	Change	
Utility margin (in millions):				
Operating revenue	\$ 370	\$ 389	\$ (19)	(5)%
Cost of fuel and energy	165	170	(5)	(3)
Utility margin	<u>\$ 205</u>	<u>\$ 219</u>	<u>\$ (14)</u>	(6)%
Sales (GWhs):				
Residential	1,587	1,544	43	3 %
Commercial	954	1,011	(57)	(6)
Industrial	1,057	1,151	(94)	(8)
Other	47	48	(1)	(2)
Total fully bundled ⁽¹⁾	3,645	3,754	(109)	(3)
Distribution only service	516	611	(95)	(16)
Total retail	4,161	4,365	(204)	(5)
Wholesale	84	153	(69)	(45)
Total GWhs sold	<u>4,245</u>	<u>4,518</u>	<u>(273)</u>	(6)%
Average number of retail customers (in thousands)				
	978	961	17	2 %
Average revenue per MWh:				
Retail - fully bundled ⁽¹⁾	\$ 95.01	\$ 96.01	\$ (1.00)	(1)%
Wholesale	\$ 49.42	\$ 31.58	\$ 17.84	56 %
Heating degree days				
	994	942	52	6 %
Cooling degree days	6	2	4	*
Sources of energy (GWhs) ⁽²⁾⁽³⁾ :				
Natural gas	2,534	2,622	(88)	(3)%
Renewables	16	16	—	—
Total energy generated	2,550	2,638	(88)	(3)
Energy purchased	1,355	1,240	115	9
Total	<u>3,905</u>	<u>3,878</u>	<u>27</u>	1 %
Average cost of energy per MWh ⁽⁴⁾ :				
Energy generated	\$ 14.96	\$ 21.95	\$ (6.99)	(32)%
Energy purchased	\$ 93.84	\$ 90.56	\$ 3.28	4 %

* Not meaningful

(1) Fully bundled includes sales to customers for combined energy, transmission and distribution services.

(2) The average cost of energy per MWh and sources of energy excludes 683 GWhs and 710 GWhs of gas generated energy that is purchased at cost by related parties for the first quarter of 2021 and 2020, respectively.

(3) GWh amounts are net of energy used by the related generating facilities.

(4) The average cost of energy per MWh includes the cost of fuel, purchased power and deferrals and does not include other costs.

Quarter Ended March 31, 2021 Compared to Quarter Ended March 31, 2020

Utility margin decreased \$14 million, or 6%, for the first quarter of 2021 compared to 2020 primarily due to:

- \$9 million of lower retail rates due to the 2020 regulatory rate review with new rates effective January 2021,
- \$2 million due to lower energy efficiency program rates (offset in operations and maintenance expense),
- \$1 million due to price impacts from changes in sales mix. Retail customer volumes, including distribution only service customers, decreased 4.7% primarily due to the impacts of COVID-19, which resulted in lower industrial, commercial and distribution only service customer usage and higher residential customer usage, offset by the favorable impacts of weather and
- \$1 million of lower other revenue due to a regulatory amortization of impact fee that ended December 2020.

Operations and maintenance decreased \$19 million, or 23%, for the first quarter of 2021 compared to 2020 primarily due to lower net regulatory instructed deferrals and amortizations of \$11 million, mainly relating to deferrals in 2020 of the non-labor cost savings from the Navajo generating station retirement which was approved for amortization in the 2020 regulatory rate review with new rates effective January 2021, and timing of the regulatory impacts for the ON Line lease cost reallocation, lower plant operations and maintenance costs, a reduction to the accrual for earning sharing and lower energy efficiency program costs (offset in operating revenue).

Depreciation and amortization increased \$11 million, or 12%, for the first quarter of 2021 compared to 2020 primarily due to regulatory amortizations approved in the 2020 regulatory rate review effective January 2021 and higher plant placed in service.

Interest expense decreased \$4 million, or 10%, for the first quarter of 2021 compared to 2020 primarily due to lower interest expense on long-term debt.

Other, net increased \$10 million for the first quarter of 2021 compared to 2020 primarily due to higher cash surrender value of corporate-owned life insurance policies of \$7 million, lower pension expense and higher interest income, mainly from carrying charges on regulatory items.

Income tax benefit decreased \$1 million, for the first quarter of 2021 compared to 2020. Nevada Power did not incur tax expense in 2021 primarily due to the recognition of amortization of excess deferred income taxes following regulatory approval effective January 2021. The effective tax rate was 20% in 2020.

Liquidity and Capital Resources

As of March 31, 2021, Nevada Power's total net liquidity was as follows (in millions):

Cash and cash equivalents	\$ 92
Credit facility	400
Total net liquidity	<u>\$ 492</u>
Credit facility:	
Maturity date	<u>2022</u>

Operating Activities

Net cash flows from operating activities for the three-month periods ended March 31, 2021 and 2020 were \$179 million and \$79 million, respectively. The change was primarily due to lower payments for fuel and energy costs, the timing of payments for operating costs and lower inventory purchases, partially offset by lower collections from customers.

Investing Activities

Net cash flows from investing activities for the three-month periods ended March 31, 2021 and 2020 were \$(106) million and \$(111) million, respectively. The change was primarily due to decreased capital expenditures. Refer to "Future Uses of Cash" for further discussion of capital expenditures.

Financing Activities

Net cash flows from financing activities for the three-month periods ended March 31, 2021 and 2020 were \$(5) million and \$140 million, respectively. The change was primarily due to lower proceeds from the issuance of long-term debt, partially offset by lower repayments of long-term debt.

Debt Authorizations

Nevada Power currently has financing authority from the PUCN consisting of the ability to: (1) establish debt issuances limited to a debt ceiling of \$3.2 billion (excluding borrowings under Nevada Power's \$400 million secured credit facility); and (2) maintain a revolving credit facility of up to \$1.3 billion. Nevada Power currently has an effective automatic shelf registration statement with the SEC to issue an indeterminate amount of general and refunding mortgage securities through October 2022.

Future Uses of Cash

Nevada Power has available a variety of sources of liquidity and capital resources, both internal and external, including net cash flows from operating activities, public and private debt offerings, the use of its secured revolving credit facility, capital contributions and other sources. These sources are expected to provide funds required for current operations, capital expenditures, debt retirements and other capital requirements. The availability and terms under which Nevada Power has access to external financing depends on a variety of factors, including regulatory approvals, Nevada Power's credit ratings, investors' judgment of risk and conditions in the overall capital markets, including the condition of the utility industry.

Capital Expenditures

Capital expenditure needs are reviewed regularly by management and may change significantly as a result of these reviews, which may consider, among other factors, changes in environmental and other rules and regulations; impacts to customers' rates; outcomes of regulatory proceedings; changes in income tax laws; general business conditions; load projections; system reliability standards; the cost and efficiency of construction labor, equipment and materials; commodity prices; and the cost and availability of capital. Prudently incurred expenditures for compliance-related items such as pollution control technologies, replacement generation and associated operating costs are generally incorporated into Nevada Power's regulated retail rates. Expenditures for certain assets may ultimately include acquisition of existing assets.

Historical and forecast capital expenditures, each of which exclude amounts for non-cash equity AFUDC and other non-cash items are as follows (in millions):

	Three-Month Periods		Annual
	Ended March 31,		Forecast
	2020	2021	2021
Electric distribution	\$ 64	\$ 41	\$ 167
Electric transmission	8	13	77
Solar generation	—	1	32
Other	39	51	181
Total	<u>\$ 111</u>	<u>\$ 106</u>	<u>\$ 457</u>

Nevada Power's Fourth Amendment to the 2018 Joint IRP proposed an increase in solar generation and electric transmission. Nevada Power has included estimates from its latest IRP filing in its forecast capital expenditures for 2021. These estimates are likely to change as a result of the RFP process and some are still pending PUCN approval. Nevada Power's historical and forecast capital expenditures include the following:

- Electric distribution includes both growth projects and operating expenditures consisting of routine expenditures for distribution needed to serve existing and expected demand.

- Electric transmission includes both growth projects and operating expenditures. Growth projects primarily relate to the Nevada Utilities' Greenlink Nevada transmission expansion program. In this project, the company has proposed to build a 350-mile, 525 kV transmission line, known as Greenlink West, connecting the Ft. Churchill substation to the Northwest substation to the Harry Allen substation. Construction of the project has been approved by the PUCN with the exception of the Northwest substation to Harry Allen substation segment for which approval was limited to design, permitting and land acquisition only. Operating expenditures consist of routine expenditures for transmission and other infrastructure needed to serve existing and expected demand.
- Solar generation investment includes expenditures for a 150 MWs solar photovoltaic facility with an additional 100 MWs capacity of co-located battery storage, known as the Dry Lake generating facility, that will be developed in Clark County, Nevada. Commercial operation is expected by the end of 2023.
- Other investments include both growth projects and operating expenditures consisting of routine expenditures for generation, other operating projects and other infrastructure needed to serve existing and expected demand.

Contractual Obligations

As of March 31, 2021, there have been no material changes outside the normal course of business in contractual obligations from the information provided in Item 7 of Nevada Power's Annual Report on Form 10-K for the year ended December 31, 2020.

Regulatory Matters

Nevada Power is subject to comprehensive regulation. Refer to "Regulatory Matters" in Berkshire Hathaway Energy's Part I, Item 2 of this Form 10-Q for discussion regarding Nevada Power's current regulatory matters.

Environmental Laws and Regulations

Nevada Power is subject to federal, state and local laws and regulations regarding climate change, RPS, air and water quality, emissions performance standards, coal combustion byproduct disposal, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact Nevada Power's current and future operations. In addition to imposing continuing compliance obligations and capital expenditure requirements, these laws and regulations provide regulators with the authority to levy substantial penalties for noncompliance including fines, injunctive relief and other sanctions. These laws and regulations are administered by the EPA and various state and local agencies. All such laws and regulations are subject to a range of interpretation, which may ultimately be resolved by the courts. Environmental laws and regulations continue to evolve, and Nevada Power is unable to predict the impact of the changing laws and regulations on its operations and consolidated financial results. Nevada Power believes it is in material compliance with all applicable laws and regulations.

Refer to "Environmental Laws and Regulations" in Berkshire Hathaway Energy's Part I, Item 2 of this Form 10-Q for additional information regarding environmental laws and regulations.

Critical Accounting Estimates

Certain accounting measurements require management to make estimates and judgments concerning transactions that will be settled several years in the future. Amounts recognized on the Consolidated Financial Statements based on such estimates involve numerous assumptions subject to varying and potentially significant degrees of judgment and uncertainty and will likely change in the future as additional information becomes available. Estimates are used for, but not limited to, the accounting for the effects of certain types of regulation, derivatives, impairment of long-lived assets, income taxes and revenue recognition - unbilled revenue. For additional discussion of Nevada Power's critical accounting estimates, see Item 7 of Nevada Power's Annual Report on Form 10-K for the year ended December 31, 2020. There have been no significant changes in Nevada Power's assumptions regarding critical accounting estimates since December 31, 2020.

Sierra Pacific Power Company and its subsidiaries
Consolidated Financial Section

PART I

Item 1. Financial Statements

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors and Shareholder of
Sierra Pacific Power Company

Results of Review of Interim Financial Information

We have reviewed the accompanying consolidated balance sheet of Sierra Pacific Power Company and subsidiaries ("Sierra Pacific") as of March 31, 2021, the related consolidated statements of operations, changes in shareholder's equity and cash flows for the three-month periods ended March 31, 2021 and 2020, and the related notes (collectively referred to as the "interim financial information"). Based on our reviews, we are not aware of any material modifications that should be made to the accompanying interim financial information for it to be in conformity with accounting principles generally accepted in the United States of America.

We have previously audited, in accordance with the standards of the Public Company Accounting Oversight Board (United States) (PCAOB), the balance sheet of Sierra Pacific as of December 31, 2020, and the related statements of operations, changes in shareholder's equity, and cash flows for the year then ended (not presented herein); and in our report dated February 26, 2021, we expressed an unqualified opinion on those financial statements. In our opinion, the information set forth in the accompanying balance sheet as of December 31, 2020, is fairly stated, in all material respects, in relation to the balance sheet from which it has been derived.

Basis for Review Results

This interim financial information is the responsibility of Sierra Pacific's management. We are a public accounting firm registered with the PCAOB and are required to be independent with respect to Sierra Pacific in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our reviews in accordance with standards of the PCAOB. A review of interim financial information consists principally of applying analytical procedures and making inquiries of persons responsible for financial and accounting matters. It is substantially less in scope than an audit conducted in accordance with the standards of the PCAOB, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, we do not express such an opinion.

/s/ Deloitte & Touche LLP

Las Vegas, Nevada
April 30, 2021

SIERRA PACIFIC POWER COMPANY AND SUBSIDIARIES
CONSOLIDATED BALANCE SHEETS (Unaudited)
(Amounts in millions, except share data)

	As of	
	March 31, 2021	December 31, 2020
ASSETS		
Current assets:		
Cash and cash equivalents	\$ 8	\$ 19
Trade receivables, net	93	97
Inventories	74	77
Derivative contracts	16	9
Regulatory assets	91	67
Other current assets	38	36
Total current assets	320	305
Property, plant and equipment, net	3,188	3,164
Regulatory assets	270	267
Other assets	185	183
Total assets	\$ 3,963	\$ 3,919
LIABILITIES AND SHAREHOLDER'S EQUITY		
Current liabilities:		
Accounts payable	\$ 103	\$ 108
Accrued interest	11	14
Accrued property, income and other taxes	16	14
Short-term debt	55	45
Regulatory liabilities	28	34
Customer deposits	14	15
Other current liabilities	33	25
Total current liabilities	260	255
Long-term debt	1,164	1,164
Finance lease obligations	119	121
Regulatory liabilities	466	463
Deferred income taxes	382	374
Other long-term liabilities	133	131
Total liabilities	2,524	2,508
Commitments and contingencies (Note 7)		
Shareholder's equity:		
Common stock - \$3.75 stated value, 20,000,000 shares authorized and 1,000 issued and outstanding	—	—
Additional paid-in capital	1,111	1,111
Retained earnings	329	301
Accumulated other comprehensive loss, net	(1)	(1)
Total shareholder's equity	1,439	1,411
Total liabilities and shareholder's equity	\$ 3,963	\$ 3,919

The accompanying notes are an integral part of the consolidated financial statements.

SIERRA PACIFIC POWER COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF OPERATIONS (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Operating revenue:		
Regulated electric	\$ 181	\$ 184
Regulated natural gas	39	48
Total operating revenue	220	232
Operating expenses:		
Cost of fuel and energy	82	80
Cost of natural gas purchased for resale	21	30
Operations and maintenance	36	42
Depreciation and amortization	36	34
Property and other taxes	6	6
Total operating expenses	181	192
Operating income	39	40
Other income (expense):		
Interest expense	(14)	(14)
Allowance for equity funds	1	1
Other, net	6	1
Total other income (expense)	(7)	(12)
Income before income tax expense	32	28
Income tax expense	4	3
Net income	<u>\$ 28</u>	<u>\$ 25</u>

The accompanying notes are an integral part of these consolidated financial statements.

SIERRA PACIFIC POWER COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CHANGES IN SHAREHOLDER'S EQUITY (Unaudited)
(Amounts in millions, except shares)

	Common Stock		Additional			Accumulated	
	Shares	Amount	Paid-in	Retained	Other	Comprehensive	Total
			Capital	Earnings	Loss, Net		Shareholder's
							Equity
Balance, December 31, 2019	1,000	\$ —	\$ 1,111	\$ 210	\$ (1)	\$	1,320
Net income	—	—	—	25	—		25
Balance, March 31, 2020	<u>1,000</u>	<u>\$ —</u>	<u>\$ 1,111</u>	<u>\$ 235</u>	<u>\$ (1)</u>	<u>\$</u>	<u>1,345</u>
Balance, December 31, 2020	1,000	\$ —	\$ 1,111	\$ 301	\$ (1)	\$	1,411
Net income	—	—	—	28	—		28
Balance, March 31, 2021	<u>1,000</u>	<u>\$ —</u>	<u>\$ 1,111</u>	<u>\$ 329</u>	<u>\$ (1)</u>	<u>\$</u>	<u>1,439</u>

The accompanying notes are an integral part of these consolidated financial statements.

SIERRA PACIFIC POWER COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CASH FLOWS (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Cash flows from operating activities:		
Net income	\$ 28	\$ 25
Adjustments to reconcile net income to net cash flows from operating activities:		
Depreciation and amortization	36	34
Allowance for equity funds	(1)	(1)
Changes in regulatory assets and liabilities	(13)	(10)
Deferred income taxes and amortization of investment tax credits	4	(3)
Deferred energy	(18)	14
Amortization of deferred energy	(3)	4
Other, net	—	1
Changes in other operating assets and liabilities:		
Trade receivables and other assets	8	1
Inventories	3	(3)
Accrued property, income and other taxes	(3)	4
Accounts payable and other liabilities	1	(12)
Net cash flows from operating activities	<u>42</u>	<u>54</u>
Cash flows from investing activities:		
Capital expenditures	(61)	(52)
Net cash flows from investing activities	<u>(61)</u>	<u>(52)</u>
Cash flows from financing activities:		
Net proceeds from short-term debt	10	—
Other, net	(2)	(1)
Net cash flows from financing activities	<u>8</u>	<u>(1)</u>
Net change in cash and cash equivalents and restricted cash and cash equivalents	(11)	1
Cash and cash equivalents and restricted cash and cash equivalents at beginning of period	26	32
Cash and cash equivalents and restricted cash and cash equivalents at end of period	<u>\$ 15</u>	<u>\$ 33</u>

The accompanying notes are an integral part of these consolidated financial statements.

SIERRA PACIFIC POWER COMPANY AND SUBSIDIARIES
NOTES TO CONSOLIDATED FINANCIAL STATEMENTS
(Unaudited)

(1) General

Sierra Pacific Power Company, together with its subsidiaries ("Sierra Pacific"), is a wholly owned subsidiary of NV Energy, Inc. ("NV Energy"), a holding company that also owns Nevada Power Company and its subsidiaries ("Nevada Power") and certain other subsidiaries. Sierra Pacific is a United States regulated electric utility company serving retail customers, including residential, commercial and industrial customers and regulated retail natural gas customers primarily in northern Nevada. NV Energy is an indirect wholly owned subsidiary of Berkshire Hathaway Energy Company ("BHE"). BHE is a holding company based in Des Moines, Iowa that owns subsidiaries principally engaged in energy businesses. BHE is a consolidated subsidiary of Berkshire Hathaway Inc. ("Berkshire Hathaway").

The unaudited Consolidated Financial Statements have been prepared in accordance with accounting principles generally accepted in the United States of America ("GAAP") for interim financial information and the United States Securities and Exchange Commission's rules and regulations for Form 10-Q and Article 10 of Regulation S-X. Accordingly, they do not include all of the disclosures required by GAAP for annual financial statements. Management believes the unaudited Consolidated Financial Statements contain all adjustments (consisting only of normal recurring adjustments) considered necessary for the fair presentation of the unaudited Consolidated Financial Statements as of March 31, 2021 and for the three-month periods ended March 31, 2021 and 2020. The Consolidated Statements of Comprehensive Income have been omitted as net income equals comprehensive income for the three-month periods ended March 31, 2021 and 2020. The results of operations for the three-month period ended March 31, 2021 are not necessarily indicative of the results to be expected for the full year.

The preparation of the unaudited Consolidated Financial Statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the unaudited Consolidated Financial Statements and the reported amounts of revenue and expenses during the period. Actual results may differ from the estimates used in preparing the unaudited Consolidated Financial Statements. Note 2 of Notes to Consolidated Financial Statements included in Sierra Pacific's Annual Report on Form 10-K for the year ended December 31, 2020 describes the most significant accounting policies used in the preparation of the unaudited Consolidated Financial Statements. There have been no significant changes in Sierra Pacific's assumptions regarding significant accounting estimates and policies during the three-month period ended March 31, 2021.

(2) Cash and Cash Equivalents and Restricted Cash and Cash Equivalents

Cash equivalents consist of funds invested in money market mutual funds, United States Treasury Bills and other investments with a maturity of three months or less when purchased. Cash and cash equivalents exclude amounts where availability is restricted by legal requirements, loan agreements or other contractual provisions. Restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, consist of funds restricted by the Public Utilities Commission of Nevada ("PUCN") for a certain renewable energy contract. A reconciliation of cash and cash equivalents and restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, as presented in the Consolidated Statements of Cash Flows is outlined below and disaggregated by the line items in which they appear on the Consolidated Balance Sheets (in millions):

	As of	
	March 31, 2021	December 31, 2020
Cash and cash equivalents	\$ 8	\$ 19
Restricted cash and cash equivalents included in other current assets	7	7
Total cash and cash equivalents and restricted cash and cash equivalents	<u>\$ 15</u>	<u>\$ 26</u>

(3) Property, Plant and Equipment, Net

Property, plant and equipment, net consists of the following (in millions):

		As of	
	Depreciable Life	March 31, 2021	December 31, 2020
Utility plant:			
Electric generation	25 - 60 years	\$ 1,131	\$ 1,130
Electric transmission	50 - 100 years	917	908
Electric distribution	20 - 100 years	1,763	1,754
Electric general and intangible plant	5 - 70 years	193	189
Natural gas distribution	35 - 70 years	431	429
Natural gas general and intangible plant	5 - 70 years	15	15
Common general	5 - 70 years	357	355
Utility plant		4,807	4,780
Accumulated depreciation and amortization		(1,783)	(1,755)
Utility plant, net		3,024	3,025
Other non-regulated, net of accumulated depreciation and amortization	70 years	2	2
Plant, net		3,026	3,027
Construction work-in-progress		162	137
Property, plant and equipment, net		\$ 3,188	\$ 3,164

(4) Income Taxes

A reconciliation of the federal statutory income tax rate to the effective income tax rate applicable to income before income tax expense is as follows:

	Three-Month Periods Ended March 31,	
	2021	2020
Federal statutory income tax rate	21 %	21 %
Effects of ratemaking	(10)	(8)
Other	2	(2)
Effective income tax rate	<u>13 %</u>	<u>11 %</u>

Effects of ratemaking is primarily attributable to the recognition of excess deferred income taxes related to the 2017 Tax Cuts and Jobs Act pursuant to an order issued by the PUCN effective January 1, 2020.

(5) Employee Benefit Plans

Sierra Pacific is a participant in benefit plans sponsored by NV Energy. The NV Energy Retirement Plan includes a qualified pension plan ("Qualified Pension Plan") and a supplemental executive retirement plan and a restoration plan (collectively, "Non-Qualified Pension Plans") that provide pension benefits for eligible employees. The NV Energy Comprehensive Welfare Benefit and Cafeteria Plan provides certain postretirement health care and life insurance benefits for eligible retirees ("Other Postretirement Plans") on behalf of Sierra Pacific. Amounts attributable to Sierra Pacific were allocated from NV Energy based upon the current, or in the case of retirees, previous, employment location. Offsetting regulatory assets and liabilities have been recorded related to the amounts not yet recognized as a component of net periodic benefit costs that will be included in regulated rates. Net periodic benefit costs not included in regulated rates are included in accumulated other comprehensive loss, net.

Amounts receivable from (payable to) NV Energy are included on the Consolidated Balance Sheets and consist of the following (in millions):

	As of	
	March 31, 2021	December 31, 2020
Qualified Pension Plan:		
Other non-current assets	\$ 27	\$ 26
Non-Qualified Pension Plans:		
Other current liabilities	(1)	(1)
Other long-term liabilities	(8)	(8)
Other Postretirement Plans:		
Other long-term liabilities	(14)	(13)

(6) Fair Value Measurements

The carrying value of Sierra Pacific's cash, certain cash equivalents, receivables, payables, accrued liabilities and short-term borrowings approximates fair value because of the short-term maturity of these instruments. Sierra Pacific has various financial assets and liabilities that are measured at fair value on the Consolidated Balance Sheets using inputs from the three levels of the fair value hierarchy. A financial asset or liability classification within the hierarchy is determined based on the lowest level input that is significant to the fair value measurement. The three levels are as follows:

- Level 1 — Inputs are unadjusted quoted prices in active markets for identical assets or liabilities that Sierra Pacific has the ability to access at the measurement date.
- Level 2 — Inputs include quoted prices for similar assets or liabilities in active markets, quoted prices for identical or similar assets or liabilities in markets that are not active, inputs other than quoted prices that are observable for the asset or liability and inputs that are derived principally from or corroborated by observable market data by correlation or other means (market corroborated inputs).
- Level 3 — Unobservable inputs reflect Sierra Pacific's judgments about the assumptions market participants would use in pricing the asset or liability since limited market data exists. Sierra Pacific develops these inputs based on the best information available, including its own data.

The following table presents Sierra Pacific's assets and liabilities recognized on the Consolidated Balance Sheets and measured at fair value on a recurring basis (in millions):

	Input Levels for Fair Value Measurements			
	Level 1	Level 2	Level 3	Total
<u>As of March 31, 2021</u>				
Assets:				
Commodity derivatives	\$ —	\$ —	\$ 16	\$ 16
Money market mutual funds ⁽¹⁾	5	—	—	5
	<u>\$ 5</u>	<u>\$ —</u>	<u>\$ 16</u>	<u>\$ 21</u>
Liabilities - commodity derivatives	<u>\$ —</u>	<u>\$ —</u>	<u>\$ (4)</u>	<u>\$ (4)</u>
<u>As of December 31, 2020</u>				
Assets:				
Commodity derivatives	\$ —	\$ —	\$ 9	\$ 9
Money market mutual funds ⁽¹⁾	17	—	—	17
	<u>\$ 17</u>	<u>\$ —</u>	<u>\$ 9</u>	<u>\$ 26</u>
Liabilities - commodity derivatives	<u>\$ —</u>	<u>\$ —</u>	<u>\$ (2)</u>	<u>\$ (2)</u>

(1) Amounts are included in cash and cash equivalents on the Consolidated Balance Sheets. The fair value of these money market mutual funds approximates cost.

Sierra Pacific's investments in money market mutual funds and investment funds are stated at fair value. When available, a readily observable quoted market price or net asset value of an identical security in an active market is used to record the fair value.

Sierra Pacific's long-term debt is carried at cost on the Consolidated Balance Sheets. The fair value of Sierra Pacific's long-term debt is a Level 2 fair value measurement and has been estimated based upon quoted market prices, where available, or at the present value of future cash flows discounted at rates consistent with comparable maturities with similar credit risks. The carrying value of Sierra Pacific's variable-rate long-term debt approximates fair value because of the frequent repricing of these instruments at market rates. The following table presents the carrying value and estimated fair value of Sierra Pacific's long-term debt (in millions):

	As of March 31, 2021		As of December 31, 2020	
	Carrying Value	Fair Value	Carrying Value	Fair Value
Long-term debt	<u>\$ 1,164</u>	<u>\$ 1,312</u>	<u>\$ 1,164</u>	<u>\$ 1,358</u>

(7) Commitments and Contingencies

Legal Matters

Sierra Pacific is party to a variety of legal actions arising out of the normal course of business. Plaintiffs occasionally seek punitive or exemplary damages. Sierra Pacific does not believe that such normal and routine litigation will have a material impact on its consolidated financial results.

Environmental Laws and Regulations

Sierra Pacific is subject to federal, state and local laws and regulations regarding climate change, renewable portfolio standards, air and water quality, emissions performance standards, coal combustion byproduct disposal, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact Sierra Pacific's current and future operations. Sierra Pacific believes it is in material compliance with all applicable laws and regulations.

(8) Revenue from Contracts with Customers

The following table summarizes Sierra Pacific's revenue from contracts with customers ("Customer Revenue") by customer class, including a reconciliation to Sierra Pacific's reportable segment information included in Note 9 (in millions):

	Three-Month Periods Ended March 31,					
	2021			2020		
	Electric	Natural Gas	Total	Electric	Natural Gas	Total
Customer Revenue:						
Retail:						
Residential	\$ 71	\$ 25	\$ 96	\$ 69	\$ 30	\$ 99
Commercial	54	10	64	57	13	70
Industrial	39	3	42	41	4	45
Other	1	—	1	1	—	1
Total fully bundled	165	38	203	168	47	215
Distribution only service	1	—	1	1	—	1
Total retail	166	38	204	169	47	216
Wholesale, transmission and other	15	—	15	14	—	14
Total Customer Revenue	181	38	219	183	47	230
Other revenue	—	1	1	1	1	2
Total revenue	<u>\$ 181</u>	<u>\$ 39</u>	<u>\$ 220</u>	<u>\$ 184</u>	<u>\$ 48</u>	<u>\$ 232</u>

(9) Segment Information

Sierra Pacific has identified two reportable operating segments: regulated electric and regulated natural gas. The regulated electric segment derives most of its revenue from regulated retail sales of electricity to residential, commercial, and industrial customers and from wholesale sales. The regulated natural gas segment derives most of its revenue from regulated retail sales of natural gas to residential, commercial, and industrial customers and also obtains revenue by transporting natural gas owned by others through its distribution system. Pricing for regulated electric and regulated natural gas sales are established separately by the PUCN; therefore, management also reviews each segment separately to make decisions regarding allocation of resources and in evaluating performance.

The following tables provide information on a reportable segment basis (in millions):

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Operating revenue:		
Regulated electric	\$ 181	\$ 184
Regulated natural gas	39	48
Total operating revenue	<u>\$ 220</u>	<u>\$ 232</u>
Operating income:		
Regulated electric	\$ 31	\$ 33
Regulated natural gas	8	7
Total operating income	39	40
Interest expense	(14)	(14)
Allowance for equity funds	1	1
Other, net	6	1
Income before income tax expense	<u>\$ 32</u>	<u>\$ 28</u>
	As of	
	March 31,	December 31,
	2021	2020
Assets:		
Regulated electric	\$ 3,589	\$ 3,540
Regulated natural gas	348	342
Other ⁽¹⁾	26	37
Total assets	<u>\$ 3,963</u>	<u>\$ 3,919</u>

(1) Consists principally of cash and cash equivalents not included in either the regulated electric or regulated natural gas segments.

Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations

The following is management's discussion and analysis of certain significant factors that have affected the consolidated financial condition and results of operations of Sierra Pacific during the periods included herein. Explanations include management's best estimate of the impact of weather, customer growth, usage trends and other factors. This discussion should be read in conjunction with Sierra Pacific's historical unaudited Consolidated Financial Statements and Notes to Consolidated Financial Statements in Part I, Item 1 of this Form 10-Q. Sierra Pacific's actual results in the future could differ significantly from the historical results.

Results of Operations for the First Quarter of 2021 and 2020

Overview

Net income for the first quarter of 2021 was \$28 million, an increase of \$3 million, or 12%, compared to 2020 primarily due to \$6 million of lower operations and maintenance expenses, mainly due to lower plant operations and maintenance expenses and a reduction to the accrual for earning sharing, and \$5 million of higher other, net, mainly due to higher cash surrender value of corporate-owned life insurance policies and lower pension costs, partially offset by \$5 million of lower electric utility margin, mainly from lower revenue recognized due to a favorable regulatory decision.

Non-GAAP Financial Measure

Management utilizes various key financial measures that are prepared in accordance with GAAP, as well as non-GAAP financial measures such as, electric utility margin and natural gas utility margin, to help evaluate results of operations. Electric utility margin is calculated as electric operating revenue less cost of fuel and energy while natural gas utility margin is calculated as natural gas operating revenue less cost of natural gas purchased for resale, which are captions presented on the Consolidated Statements of Operations.

Sierra Pacific's cost of fuel and energy and cost of natural gas purchased for resale are generally recovered from its customers through regulatory recovery mechanisms and as a result, changes in Sierra Pacific's expenses result in comparable changes to revenue. As such, management believes electric utility margin and natural gas utility margin more appropriately and concisely explain profitability rather than a discussion of revenue and cost of sales separately. Management believes the presentation of electric utility margin and natural gas utility margin provides meaningful and valuable insight into the information management considers important to running the business and a measure of comparability to others in the industry.

Electric utility margin and natural gas utility margin are not measures calculated in accordance with GAAP and should be viewed as a supplement to, and not a substitute for, operating income which is the most directly comparable financial measure prepared in accordance with GAAP. The following table provides a reconciliation of utility margin to operating income (in millions):

	First Quarter			
	2021	2020	Change	
Electric utility margin:				
Operating revenue	\$ 181	\$ 184	\$ (3)	(2)%
Cost of fuel and energy	82	80	2	3
Electric utility margin	<u>99</u>	<u>104</u>	<u>(5)</u>	<u>(5)</u>
Natural gas utility margin:				
Operating revenue	39	48	(9)	(19)%
Natural gas purchased for resale	<u>21</u>	<u>30</u>	<u>(9)</u>	<u>(30)</u>
Natural gas utility margin	<u>18</u>	<u>18</u>	<u>—</u>	<u>—</u>
Utility margin	<u>117</u>	<u>122</u>	<u>(5)</u>	<u>(4)%</u>
Operations and maintenance	36	42	(6)	(14)%
Depreciation and amortization	36	34	2	6
Property and other taxes	6	6	—	—
Operating income	<u>\$ 39</u>	<u>\$ 40</u>	<u>\$ (1)</u>	<u>(3)%</u>

Electric Utility Margin

A comparison of key operating results related to electric utility margin is as follows for the quarters ended March 31:

	First Quarter			
	2021	2020	Change	
Utility margin (in millions):				
Operating revenue	\$ 181	\$ 184	\$ (3)	(2)%
Cost of fuel and energy	82	80	2	3
Utility margin	<u>\$ 99</u>	<u>\$ 104</u>	<u>\$ (5)</u>	(5)%
Sales (GWhs):				
Residential	671	635	36	6 %
Commercial	677	701	(24)	(3)
Industrial	897	909	(12)	(1)
Other	4	4	—	—
Total fully bundled ⁽¹⁾	2,249	2,249	—	—
Distribution only service	397	412	(15)	(4)
Total retail	2,646	2,661	(15)	(1)
Wholesale	175	193	(18)	(9)
Total GWhs sold	<u>2,821</u>	<u>2,854</u>	<u>(33)</u>	(1)%
Average number of retail customers (in thousands)				
	363	356	7	2 %
Average revenue per MWh:				
Retail - fully bundled ⁽¹⁾	\$ 73.17	\$ 74.76	\$ (1.59)	(2)%
Wholesale	\$ 60.18	\$ 49.05	\$ 11.13	23 %
Heating degree days				
	2,198	2,066	132	6 %
Sources of energy (GWhs) ⁽²⁾ :				
Natural gas	1,082	1,215	(133)	(11)%
Coal	29	66	(37)	(56)
Renewables ⁽³⁾	6	6	—	—
Total energy generated	1,117	1,287	(170)	(13)
Energy purchased	1,373	1,325	48	4
Total	<u>2,490</u>	<u>2,612</u>	<u>(122)</u>	(5)%
Average cost of energy per MWh ⁽⁴⁾ :				
Energy generated	\$ 25.23	\$ 26.53	\$ (1.30)	(5)%
Energy purchased	\$ 38.93	\$ 34.96	\$ 3.97	11 %

(1) Fully bundled includes sales to customers for combined energy, transmission and distribution services.

(2) GWh amounts are net of energy used by the related generating facilities.

(3) Includes the Fort Churchill Solar Array which is under lease by Sierra Pacific.

(4) The average cost of energy per MWh includes the cost of fuel, purchased power and deferrals and does not include other costs.

Natural Gas Utility Margin

A comparison of key operating results related to natural gas utility margin is as follows for the quarters ended March 31:

	First Quarter			
	2021	2020	Change	
Utility margin (in millions):				
Operating revenue	\$ 39	\$ 48	\$ (9)	(19)%
Natural gas purchased for resale	21	30	(9)	(30)
Utility margin	<u>\$ 18</u>	<u>\$ 18</u>	<u>\$ —</u>	<u>— %</u>
Sold (000's Dths):				
Residential	4,658	4,386	272	6 %
Commercial	2,304	2,167	137	6
Industrial	745	653	92	14
Total retail	<u>7,707</u>	<u>7,206</u>	<u>501</u>	<u>7 %</u>
Average number of retail customers (in thousands)	176	173	3	2 %
Average revenue per retail Dth sold	\$ 5.03	\$ 6.58	\$ (1.55)	(24)%
Heating degree days	2,198	2,066	132	6 %
Average cost of natural gas per retail Dth sold	\$ 2.73	\$ 4.22	\$ (1.49)	(35)%

Quarter Ended March 31, 2021 Compared to Quarter Ended March 31, 2020

Electric utility margin decreased \$5 million, or 5%, for the first quarter of 2021 compared to 2020 primarily due to:

- \$3 million in lower revenue recognized due to a favorable regulatory decision and
- \$1 million due to price impacts from changes in sales mix. Retail customer volumes, including distribution only service customers, decreased 0.6% primarily due to the impacts of COVID-19, which resulted in lower distribution only service, commercial and industrial customer usage and higher residential customer usage, offset by the favorable impacts of weather.

Operations and maintenance decreased \$6 million, or 14%, for the first quarter of 2021 compared to 2020 primarily due to lower plant operations and maintenance expenses, a reduction to the accrual for earning sharing and lower regulatory amortizations.

Depreciation and amortization increased \$2 million, or 6%, for the first quarter of 2021 compared to 2020 primarily due to regulatory amortizations and higher plant in service.

Other, net increased \$5 million for the first quarter of 2021 compared to 2020 primarily due to higher cash surrender value of corporate-owned life insurance policies and lower pension costs.

Income tax expense increased \$1 million, or 33%, for the first quarter of 2021 compared to 2020. The effective tax rate was 13% in 2021 and 11% in 2020 and increased primarily due to higher pre-tax income.

Liquidity and Capital Resources

As of March 31, 2021, Sierra Pacific's total net liquidity was as follows (in millions):

Cash and cash equivalents	\$ 8
Credit facility	250
Less -	
Short-term debt	(55)
Net credit facility	195
Total net liquidity	\$ 203
Credit facility:	
Maturity date	2022

Operating Activities

Net cash flows from operating activities for the three-month periods ended March 31, 2021 and 2020 were \$42 million and \$54 million, respectively. The change was primarily due to higher payments for fuel and energy costs and lower collections from customers partially offset by lower inventory purchases, the timing of payments for operating costs and increased collections of customer advances.

Investing Activities

Net cash flows from investing activities for the three-month periods ended March 31, 2021 and 2020 were \$(61) million and \$(52) million, respectively. The change was primarily due to increased capital expenditures. Refer to "Future Uses of Cash" for further discussion of capital expenditures.

Financing Activities

Net cash flows from financing activities for the three-month periods ended March 31, 2021 and 2020 were \$8 million and \$(1) million, respectively. The change was primarily due to higher proceeds from short-term debt.

Debt Authorizations

Sierra Pacific currently has financing authority from the PUCN consisting of the ability to: (1) establish debt issuances limited to a debt ceiling of \$1.6 billion (excluding borrowings under Sierra Pacific's \$250 million secured credit facility); and (2) maintain a revolving credit facility of up to \$600 million.

Future Uses of Cash

Sierra Pacific has available a variety of sources of liquidity and capital resources, both internal and external, including net cash flows from operating activities, public and private debt offerings, the use of its secured revolving credit facility, capital contributions and other sources. These sources are expected to provide funds required for current operations, capital expenditures, debt retirements and other capital requirements. The availability and terms under which Sierra Pacific has access to external financing depends on a variety of factors, including regulatory approvals, Sierra Pacific's credit ratings, investors' judgment of risk and conditions in the overall capital markets, including the condition of the utility industry.

Capital Expenditures

Capital expenditure needs are reviewed regularly by management and may change significantly as a result of these reviews, which may consider, among other factors, changes in environmental and other rules and regulations; impacts to customers' rates; outcomes of regulatory proceedings; changes in income tax laws; general business conditions; load projections; system reliability standards; the cost and efficiency of construction labor, equipment and materials; commodity prices; and the cost and availability of capital. Prudently incurred expenditures for compliance-related items such as pollution-control technologies, replacement generation and associated operating costs are generally incorporated into Sierra Pacific's regulated retail rates. Expenditures for certain assets may ultimately include acquisition of existing assets.

Historical and forecast capital expenditures, each of which exclude amounts for non-cash equity AFUDC and other non-cash items are as follows (in millions):

	Three-Month Periods Ended March 31,		Annual Forecast
	2020	2021	2021
Electric distribution	\$ 37	\$ 20	\$ 126
Electric transmission	8	16	124
Solar generation	—	—	18
Other	7	25	129
Total	<u>\$ 52</u>	<u>\$ 61</u>	<u>\$ 397</u>

Sierra Pacific's Fourth Amendment to the 2018 Joint IRP proposed an increase in electric transmission. Sierra Pacific has included estimates from its latest IRP filing in its forecast capital expenditures for 2021. These estimates are likely to change as a result of the RFP process and some are still pending PUCN approval. Sierra Pacific's historical and forecast capital expenditures include the following:

- Electric distribution includes both growth projects and operating expenditures consisting of routine expenditures for distribution needed to serve existing and expected demand.
- Electric transmission includes both growth projects and operating expenditures. Growth projects primarily relate to the Nevada Utilities' Greenlink Nevada transmission expansion program. In this project, the company has proposed to build a 235-mile, 525 kV transmission line, known as Greenlink North, connecting the new Ft. Churchill substation to the Robinson Summit substation; a 46-mile, 345 kV transmission line from the new Ft. Churchill substation to the Mira Loma substations; and a 38-mile, 345 kV transmission line from the new Ft. Churchill substation to the Comstock Meadows substations. Construction of the project has been approved by the PUCN with the exception of the Ft. Churchill substation to the Robinson Summit substation segment for which conditional approval was limited to design, permitting and land acquisition only. Operating expenditures consist of routine expenditures for transmission and other infrastructure needed to serve existing and expected demand.
- Other investments include both growth projects and operating expenditures consisting of routine expenditures for generation, other operating projects and other infrastructure needed to serve existing and expected demand.

Contractual Obligations

As of March 31, 2021, there have been no material changes outside the normal course of business in contractual obligations from the information provided in Item 7 of Sierra Pacific's Annual Report on Form 10-K for the year ended December 31, 2020.

Regulatory Matters

Sierra Pacific is subject to comprehensive regulation. Refer to "Regulatory Matters" in Berkshire Hathaway Energy's Part I, Item 2 of this Form 10-Q for discussion regarding Sierra Pacific's current regulatory matters.

Environmental Laws and Regulations

Sierra Pacific is subject to federal, state and local laws and regulations regarding climate change, RPS, air and water quality, emissions performance standards, coal combustion byproduct disposal, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact Sierra Pacific's current and future operations. In addition to imposing continuing compliance obligations and capital expenditure requirements, these laws and regulations provide regulators with the authority to levy substantial penalties for noncompliance including fines, injunctive relief and other sanctions. These laws and regulations are administered by the EPA and various state and local agencies. All such laws and regulations are subject to a range of interpretation, which may ultimately be resolved by the courts. Environmental laws and regulations continue to evolve, and Sierra Pacific is unable to predict the impact of the changing laws and regulations on its operations and consolidated financial results. Sierra Pacific believes it is in material compliance with all applicable laws and regulations.

Refer to "Environmental Laws and Regulations" in Berkshire Hathaway Energy's Part I, Item 2 of this Form 10-Q for additional information regarding environmental laws and regulations.

Critical Accounting Estimates

Certain accounting measurements require management to make estimates and judgments concerning transactions that will be settled several years in the future. Amounts recognized on the Consolidated Financial Statements based on such estimates involve numerous assumptions subject to varying and potentially significant degrees of judgment and uncertainty and will likely change in the future as additional information becomes available. Estimates are used for, but not limited to, the accounting for the effects of certain types of regulation, derivatives, impairment of long-lived assets, income taxes and revenue recognition - unbilled revenue. For additional discussion of Sierra Pacific's critical accounting estimates, see Item 7 of Sierra Pacific's Annual Report on Form 10-K for the year ended December 31, 2020. There have been no significant changes in Sierra Pacific's assumptions regarding critical accounting estimates since December 31, 2020.

Eastern Energy Gas Holdings, LLC and its subsidiaries
Consolidated Financial Section

PART I

Item 1. Financial Statements

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors of
Eastern Energy Gas Holdings, LLC

Results of Review of Interim Financial Information

We have reviewed the accompanying consolidated balance sheet of Eastern Energy Gas Holdings, LLC and subsidiaries ("Eastern Energy Gas") as of March 31, 2021, the related consolidated statements of operations, comprehensive income, changes in equity and cash flows for the three-month periods ended March 31, 2021 and 2020, and the related notes (collectively referred to as the "interim financial information"). Based on our reviews, we are not aware of any material modifications that should be made to the accompanying interim financial information for it to be in conformity with accounting principles generally accepted in the United States of America.

We have previously audited, in accordance with the standards of the Public Company Accounting Oversight Board (United States) (PCAOB), the consolidated balance sheet of Eastern Energy Gas as of December 31, 2020, and the related consolidated statements of operations, comprehensive income, changes in equity, and cash flows for the year then ended (not presented herein); and in our report dated February 26, 2021, we expressed an unqualified opinion on those consolidated financial statements. In our opinion, the information set forth in the accompanying consolidated balance sheet as of December 31, 2020, is fairly stated, in all material respects, in relation to the consolidated balance sheet from which it has been derived.

Basis for Review Results

This interim financial information is the responsibility of Eastern Energy Gas' management. We are a public accounting firm registered with the PCAOB and are required to be independent with respect to Eastern Energy Gas in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our reviews in accordance with standards of the PCAOB. A review of interim financial information consists principally of applying analytical procedures and making inquiries of persons responsible for financial and accounting matters. It is substantially less in scope than an audit conducted in accordance with the standards of the PCAOB, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, we do not express such an opinion.

/s/ Deloitte & Touche LLP

Richmond, Virginia
April 30, 2021

EASTERN ENERGY GAS HOLDINGS, LLC AND SUBSIDIARIES
CONSOLIDATED BALANCE SHEETS (Unaudited)
(Amounts in millions)

	As of	
	March 31, 2021	December 31, 2020
ASSETS		
Current assets:		
Cash and cash equivalents	\$ 106	\$ 35
Restricted cash and cash equivalents	9	13
Trade receivables, net	158	177
Receivables from affiliates	263	139
Other receivables	44	51
Inventories	120	119
Other current assets	145	122
Total current assets	845	656
Property, plant and equipment, net	10,099	10,144
Goodwill	1,286	1,286
Investments	262	244
Other assets	240	291
Total assets	\$ 12,732	\$ 12,621

The accompanying notes are an integral part of these consolidated financial statements.

EASTERN ENERGY GAS HOLDINGS, LLC AND SUBSIDIARIES
CONSOLIDATED BALANCE SHEETS (Unaudited) (continued)
(Amounts in millions)

	As of	
	March 31, 2021	December 31, 2020
LIABILITIES AND EQUITY		
Current liabilities:		
Accounts payable	\$ 59	\$ 71
Accounts payable to affiliates	57	39
Accrued interest	54	19
Accrued property, income and other taxes	60	29
Notes payable	—	9
Current portion of long-term debt	500	500
Other current liabilities	127	147
Total current liabilities	857	814
Long-term debt	3,914	3,925
Regulatory liabilities	668	669
Other long-term liabilities	215	218
Total liabilities	5,654	5,626
Commitments and contingencies (Note 8)		
Equity:		
Member's equity:		
Membership interests	3,035	2,957
Accumulated other comprehensive loss, net	(45)	(53)
Total member's equity	2,990	2,904
Noncontrolling interests	4,088	4,091
Total equity	7,078	6,995
Total liabilities and equity	\$ 12,732	\$ 12,621

The accompanying notes are an integral part of these consolidated financial statements.

EASTERN ENERGY GAS HOLDINGS, LLC AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF OPERATIONS (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Operating revenue	\$ 486	\$ 556
Operating expenses:		
Cost of gas	—	8
Operations and maintenance	124	168
Depreciation and amortization	80	93
Property and other taxes	39	39
Total operating expenses	243	308
Operating income	243	248
Other income (expense):		
Interest expense	(44)	(58)
Allowance for equity funds	2	5
Interest and dividend income	—	30
Other, net	1	14
Total other income (expense)	(41)	(9)
Income before income tax expense and equity income	202	239
Income tax expense	27	52
Equity income	16	15
Net income	191	202
Net income attributable to noncontrolling interests	102	33
Net income attributable to Eastern Energy Gas	\$ 89	\$ 169

The accompanying notes are an integral part of these consolidated financial statements.

EASTERN ENERGY GAS HOLDINGS, LLC AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF COMPREHENSIVE INCOME (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Net income	\$ 191	\$ 202
Other comprehensive income (loss), net of tax:		
Unrecognized amounts on retirement benefits, net of tax of \$— and \$1	2	1
Unrealized gains (losses) on cash flow hedges, net of tax of \$3 and \$(30)	10	(85)
Total other comprehensive income (loss), net of tax	12	(84)
Comprehensive income	203	118
Comprehensive income attributable to noncontrolling interests	106	33
Comprehensive income attributable to Eastern Energy Gas	\$ 97	\$ 85

The accompanying notes are an integral part of these consolidated financial statements.

EASTERN ENERGY GAS HOLDINGS, LLC AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CHANGES IN EQUITY (Unaudited)
(Amounts in millions)

	Membership Interests	Accumulated Other Comprehensive Loss, Net	Noncontrolling Interests	Total Equity
Balance, December 31, 2019	\$ 9,031	\$ (187)	\$ 1,385	\$ 10,229
Net income	169	—	33	202
Other comprehensive loss	—	(84)	—	(84)
Distributions	(232)	—	(37)	(269)
Balance, March 31, 2020	<u>\$ 8,968</u>	<u>\$ (271)</u>	<u>\$ 1,381</u>	<u>\$ 10,078</u>
Balance, December 31, 2020	\$ 2,957	\$ (53)	\$ 4,091	\$ 6,995
Net income	89	—	102	191
Other comprehensive income	—	8	4	12
Contributions	11	—	—	11
Distributions	(22)	—	(109)	(131)
Balance, March 31, 2021	<u>\$ 3,035</u>	<u>\$ (45)</u>	<u>\$ 4,088</u>	<u>\$ 7,078</u>

The accompanying notes are an integral part of these consolidated financial statements.

EASTERN ENERGY GAS HOLDINGS, LLC AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CASH FLOWS (Unaudited)
(Amounts in millions)

	Three-Month Periods	
	Ended March 31,	
	2021	2020
Cash flows from operating activities:		
Net income	\$ 191	\$ 202
Adjustments to reconcile net income to net cash flows from operating activities:		
Depreciation and amortization	80	93
Allowance for equity funds	(2)	(5)
Equity income, net of distributions	(5)	(1)
Changes in regulatory assets and liabilities	6	7
Deferred income taxes	30	15
Other, net	—	(1)
Changes in other operating assets and liabilities:		
Trade receivables and other assets	(56)	357
Derivative collateral, net	2	9
Pension and other postretirement benefit plans	—	(18)
Accrued property, income and other taxes	(25)	(17)
Accounts payable and other liabilities	20	26
Net cash flows from operating activities	241	667
Cash flows from investing activities:		
Capital expenditures	(55)	(76)
Loans to affiliates	—	(262)
Other, net	(1)	(4)
Net cash flows from investing activities	(56)	(342)
Cash flows from financing activities:		
Net repayments of short-term debt	—	(32)
Repayment of notes payable, net	(9)	(5)
Distributions	(109)	(269)
Net cash flows from financing activities	(118)	(306)
Net change in cash and cash equivalents and restricted cash and cash equivalents	67	19
Cash and cash equivalents and restricted cash and cash equivalents at beginning of period	48	39
Cash and cash equivalents and restricted cash and cash equivalents at end of period	\$ 115	\$ 58

The accompanying notes are an integral part of these consolidated financial statements.

EASTERN ENERGY GAS HOLDINGS, LLC AND SUBSIDIARIES
NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

(1) General

Eastern Energy Gas Holdings, LLC and its subsidiaries ("Eastern Energy Gas") is a holding company that conducts business activities consisting of Federal Energy Regulatory Commission ("FERC")-regulated interstate natural gas transportation pipeline and underground storage operations in the eastern region of the United States and operates Cove Point LNG, LP ("Cove Point"), a liquefied natural gas ("LNG") export, import and storage facility. Eastern Energy Gas owns 100% of the general partner interest and 25% of the limited partnership interest in Cove Point. In addition, Eastern Energy Gas owns a 50% noncontrolling interest in Iroquois Gas Transmission System, L.P. ("Iroquois"), a 416-mile FERC-regulated interstate natural gas transportation pipeline.

In July 2020, Dominion Energy, Inc. ("DEI") entered into an agreement to sell substantially all of its gas transmission and storage operations, including Eastern Energy Gas and a 25% limited partnership interest in Cove Point, to Berkshire Hathaway Energy Company ("BHE"). Approval of the transaction under the Hart-Scott-Rodino Act was not obtained within 75 days and DEI and BHE mutually agreed to a dual-phase closing consisting of two separate disposal groups identified as the acquisition of substantially all of the natural gas transmission and storage business of DEI and Dominion Energy Questar Corporation, exclusive of Dominion Energy Questar Pipeline, LLC and related entities (the "Questar Pipeline Group") (the "GT&S Transaction") and the proposed sale of the Questar Pipeline Group by DEI to BHE pursuant to a purchase and sale agreement entered into on October 5, 2020 ("Q-Pipe Transaction"). The Q-Pipe Transaction is currently anticipated to close in the first half of 2021, contingent on clearance or approval under the Hart-Scott-Rodino Act, and other customary closing and regulatory conditions. Prior to the completion of the GT&S Transaction, Eastern Energy Gas finalized a restructuring whereby Eastern Energy Gas distributed the Questar Pipeline Group and a 50% noncontrolling interest in Cove Point to DEI. This restructuring was accounted for by Eastern Energy Gas as a reorganization of entities under common control and the disposition was reflected as an equity transaction. The disposition was not reported as a discontinued operation as the disposal did not represent a strategic shift in the way management had intended to run the business. On November 1, 2020, BHE completed the GT&S Transaction. As a result of the GT&S Transaction, Eastern Energy Gas became an indirect wholly owned subsidiary of BHE. BHE is a holding company based in Des Moines, Iowa that owns subsidiaries principally engaged in the energy industry. BHE is a consolidated subsidiary of Berkshire Hathaway Inc. ("Berkshire Hathaway").

The unaudited Consolidated Financial Statements have been prepared in accordance with accounting principles generally accepted in the United States of America ("GAAP") for interim financial information and the United States Securities and Exchange Commission's rules and regulations for Form 10-Q and Article 10 of Regulation S-X. Accordingly, they do not include all of the disclosures required by GAAP for annual financial statements. Management believes the unaudited Consolidated Financial Statements contain all adjustments (consisting only of normal recurring adjustments) considered necessary for the fair presentation of the unaudited Consolidated Financial Statements as of March 31, 2021 and for the three-month periods ended March 31, 2021 and 2020. The results of operations for the three-month periods ended March 31, 2021 are not necessarily indicative of the results to be expected for the full year.

The preparation of the unaudited Consolidated Financial Statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the unaudited Consolidated Financial Statements and the reported amounts of revenue and expenses during the period. Actual results may differ from the estimates used in preparing the unaudited Consolidated Financial Statements. Note 2 of Notes to Consolidated Financial Statements included in Eastern Energy Gas' Annual Report on Form 10-K for the year ended December 31, 2020 describes the most significant accounting policies used in the preparation of the unaudited Consolidated Financial Statements. There have been no significant changes in Eastern Energy Gas' assumptions regarding significant accounting estimates and policies during the three-month period ended March 31, 2021.

(2) **Property, Plant and Equipment, Net**

Property, plant and equipment, net consists of the following (in millions):

	Depreciable Life	As of	
		March 31, 2021	December 31, 2020
Utility Plant:			
Interstate natural gas pipeline assets	24 - 43 years	\$ 8,385	\$ 8,382
Intangible plant	5 - 10 years	114	115
Utility plant in service		8,499	8,497
Accumulated depreciation and amortization		(2,792)	(2,759)
Utility plant in service, net		5,707	5,738
Nonutility Plant:			
LNG facility	40 years	4,460	4,454
Intangible plant	14 years	25	25
Nonutility plant in service		4,485	4,479
Accumulated depreciation and amortization		(320)	(283)
Nonutility plant in service, net		4,165	4,196
Plant, net		9,872	9,934
Construction work- in-progress		227	210
Property, plant and equipment, net		\$ 10,099	\$ 10,144

Construction work-in-progress includes \$211 million and \$196 million as of March 31, 2021 and December 31, 2020, respectively, related to the construction of utility plant.

(3) Investments and Restricted Cash and Cash Equivalents

Investments and restricted cash and cash equivalents consists of the following (in millions):

	As of	
	March 31, 2021	December 31, 2020
Investments:		
Investment funds	\$ 12	\$ —
Equity method investments:		
Iroquois	250	244
Total investments	262	244
Restricted cash and cash equivalents:		
Customer deposits	9	13
Total restricted cash and cash equivalents	9	13
Total investments and restricted cash and cash equivalents	\$ 271	\$ 257
Reflected as:		
Current assets	\$ 9	\$ 13
Noncurrent assets	262	244
Total investments and restricted cash and cash equivalents	\$ 271	\$ 257

Equity Method Investments

Eastern Energy Gas, through a subsidiary, owns 50% of Iroquois, which owns and operates an interstate natural gas pipeline located in the states of New York and Connecticut. Prior to the GT&S Transaction, Eastern Energy Gas, through the Questar Pipeline Group, owned 50% of White River Hub, which owns and operates a natural gas pipeline in northwest Colorado.

As of March 31, 2021 and December 31, 2020, the carrying amount of Eastern Energy Gas' investments exceeded its share of underlying equity in net assets by \$130 million. The difference reflects equity method goodwill and is not being amortized. Eastern Energy Gas received distributions from its investments of \$10 million and \$15 million for the three-month periods ended March 31, 2021 and 2020, respectively.

Cash and Cash Equivalents and Restricted Cash and Cash Equivalents

Cash equivalents consist of funds invested in money market mutual funds, United States Treasury Bills and other investments with a maturity of three months or less when purchased. Cash and cash equivalents exclude amounts where availability is restricted by legal requirements, loan agreements or other contractual provisions. Restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020 consist substantially of customer deposits as allowed under the FERC gas tariffs. A reconciliation of cash and cash equivalents and restricted cash and cash equivalents as of March 31, 2021 and December 31, 2020, as presented in the Consolidated Statements of Cash Flows is outlined below and disaggregated by the line items in which they appear on the Consolidated Balance Sheets (in millions):

	As of	
	March 31, 2021	December 31, 2020
Cash and cash equivalents	\$ 106	\$ 35
Restricted cash and cash equivalents	9	13
Total cash and cash equivalents and restricted cash and cash equivalents	<u>\$ 115</u>	<u>\$ 48</u>

(4) Regulatory Matters

Eastern Gas Transmission and Storage, Inc.

In July 2017, the FERC audit staff communicated to Eastern Gas Transmission and Storage, Inc. ("EGTS") that it had substantially completed an audit of EGTS' compliance with the accounting and reporting requirements of the FERC's Uniform System of Accounts and provided a description of matters and preliminary recommendations. In November 2017, the FERC audit staff issued its audit report. In December 2017, EGTS provided its response to the audit report. EGTS requested FERC review of the contested findings and submitted its plan for compliance with the uncontested portions of the report. EGTS reached resolution of certain matters with the FERC in the fourth quarter of 2018. EGTS recognized a charge of \$129 million (\$94 million after-tax) for the year ended December 31, 2018 for a disallowance of plant, originally established beginning in 2012, for the resolution of one matter with the FERC. In December 2020, the FERC issued a final ruling on the remaining matter, which resulted in a \$43 million (\$31 million after-tax) charge for disallowance of capitalized allowance for funds used during construction. As a condition of the December 2020 ruling, EGTS will file its proposed accounting entries and supporting documentation with the FERC by the second quarter of 2021; however, EGTS does not expect a material change from the charge recognized.

Cove Point

In January 2020, pursuant to the terms of a previous settlement, Cove Point filed a general rate case for its FERC-jurisdictional services, with proposed rates to be effective March 1, 2020. Cove Point proposed an annual cost-of-service of \$182 million. In February 2020, the FERC approved suspending the changes in rates for five months following the proposed effective date, until August 1, 2020, subject to refund. In November 2020, Cove Point reached an agreement in principle with the active participants in the general rate case proceeding. Under the terms of the agreement in principle, Cove Point's rates effective August 1, 2020 result in an increase to annual revenues of \$4 million and a decrease in annual depreciation expense of \$1 million, compared to the rates in effect prior to August 1, 2020. The interim settlement rates were implemented November 1, 2020, and Cove Point's provision for rate refunds for August 2020 through October 2020 totaled \$7 million. The agreement in principle was reflected in a stipulation and agreement filed with the FERC in January 2021. In March 2021, the FERC approved the stipulation and agreement and the rate refunds to customers were processed in late April 2021.

(5) Income Taxes

A reconciliation of the federal statutory income tax rate to the effective income tax rate applicable to income before income tax expense is as follows:

	Three-Month Periods Ended March 31,	
	2021	2020
Federal statutory income tax rate	21 %	21 %
State income tax, net of federal income tax benefit	3	3
Equity interest	2	1
Effects of ratemaking	(1)	(1)
Absence of noncontrolling interest	(11)	(3)
Other, net	(1)	1
Effective income tax rate	13 %	22 %

Absence of tax on noncontrolling interest is attributable to Eastern Energy Gas' ownership in Cove Point. The GT&S Transaction resulted in a change of noncontrolling interest to 75% as of March 31, 2021 from 25% as of March 31, 2020.

Through October 31, 2020, Eastern Energy Gas was included in DEI's consolidated federal income tax return and, where applicable, combined state income tax returns. All affiliate payables or receivables were settled with DEI prior to the closing date of the GT&S Transaction. Subsequent to the GT&S Transaction, Eastern Energy Gas, as a subsidiary of BHE, is included in Berkshire Hathaway's United States federal income tax return. Consistent with established regulatory practice, Eastern Energy Gas' provisions for income tax have been computed on a stand-alone basis, and substantially all of its currently payable or receivable income tax is remitted to or received from BHE. Eastern Energy Gas made no cash payments for income tax to BHE for the three-month period ended March 31, 2021.

(6) Employee Benefit Plans

Prior to the GT&S Transaction, certain Eastern Energy Gas employees not represented by collective bargaining units were covered by the Dominion Energy Pension Plan, a defined benefit pension plan sponsored by DEI that provides benefits to multiple DEI subsidiaries. As participating employers, Eastern Energy Gas was subject to DEI's funding policy, which was to contribute annually an amount that is in accordance with the Employee Retirement Income Security Act of 1974. Also prior to the GT&S Transaction, pension benefits for Eastern Energy Gas employees represented by collective bargaining units were provided by a separate plan that provides benefits to employees of both EGTS and Hope Gas, Inc. ("Hope"). Subsequent to the GT&S Transaction, Eastern Energy Gas employees are covered by the MidAmerican Energy Company ("MidAmerican Energy") Pension Plan, similar to the DEI plan.

Prior to the GT&S Transaction, certain retiree healthcare and life insurance benefits for Eastern Energy Gas employees not represented by collective bargaining units were covered by the Dominion Energy Retiree Health and Welfare Plan, a plan sponsored by DEI that provides certain retiree healthcare and life insurance benefits to multiple DEI subsidiaries. Also prior to the GT&S Transaction, retiree health and life insurance benefits for Eastern Energy Gas employees represented by collective bargaining units were covered by a separate other postretirement benefit plan that provides benefits to both EGTS and Hope. Subsequent to the GT&S Transaction, Eastern Energy Gas employees are covered by the MidAmerican Energy Retiree Health and Welfare plan, similar to the DEI plan.

Net periodic benefit cost (credit) for the pension and other postretirement benefit plans included the following components (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Pension:		
Service cost	\$ —	\$ 1
Interest cost	—	3
Expected return on plan assets	—	(14)
Net amortization	—	2
Net periodic benefit cost (credit)	<u>\$ —</u>	<u>\$ (8)</u>
Other Postretirement:		
Service cost	\$ —	\$ 1
Interest cost	—	1
Expected return on plan assets	—	(5)
Net amortization	—	(1)
Net periodic benefit cost (credit)	<u>\$ —</u>	<u>\$ (4)</u>

(7) Fair Value Measurements

The carrying value of Eastern Energy Gas' cash, certain cash equivalents, receivables, payables, accrued liabilities and short-term borrowings approximates fair value because of the short-term maturity of these instruments. Eastern Energy Gas has various financial assets and liabilities that are measured at fair value on the Consolidated Financial Statements using inputs from the three levels of the fair value hierarchy. A financial asset or liability classification within the hierarchy is determined based on the lowest level input that is significant to the fair value measurement. The three levels are as follows:

- Level 1 - Inputs are unadjusted quoted prices in active markets for identical assets or liabilities that Eastern Energy Gas has the ability to access at the measurement date.
- Level 2 - Inputs include quoted prices for similar assets or liabilities in active markets, quoted prices for identical or similar assets or liabilities in markets that are not active, inputs other than quoted prices that are observable for the asset or liability and inputs that are derived principally from or corroborated by observable market data by correlation or other means (market corroborated inputs).
- Level 3 - Unobservable inputs reflect Eastern Energy Gas' judgments about the assumptions market participants would use in pricing the asset or liability since limited market data exists. Eastern Energy Gas develops these inputs based on the best information available, including its own data.

The following table presents Eastern Energy Gas' financial assets and liabilities recognized on the Consolidated Balance Sheets and measured at fair value on a recurring basis (in millions):

	Input Levels for Fair Value Measurements			
	Level 1	Level 2	Level 3	Total
As of March 31, 2021				
Assets:				
Foreign currency exchange rate derivatives	\$ —	\$ 12	\$ —	\$ 12
Money market mutual funds ⁽¹⁾	71	—	—	71
Investment funds	12	—	—	12
	<u>\$ 83</u>	<u>\$ 12</u>	<u>\$ —</u>	<u>\$ 95</u>
Liabilities:				
Foreign currency exchange rate derivatives	\$ —	\$ (1)	\$ —	\$ (1)
Interest rate derivatives	—	(3)	—	(3)
	<u>\$ —</u>	<u>\$ (4)</u>	<u>\$ —</u>	<u>\$ (4)</u>
As of December 31, 2020				
Assets:				
Foreign currency exchange rate derivatives	\$ —	\$ 20	\$ —	\$ 20
	<u>\$ —</u>	<u>\$ 20</u>	<u>\$ —</u>	<u>\$ 20</u>
Liabilities:				
Commodity derivatives	\$ —	\$ (1)	\$ —	\$ (1)
Foreign currency exchange rate derivatives	—	(2)	—	(2)
Interest rate derivatives	—	(6)	—	(6)
	<u>\$ —</u>	<u>\$ (9)</u>	<u>\$ —</u>	<u>\$ (9)</u>

(1) Amounts are included in cash and cash equivalents on the Consolidated Balance Sheets. The fair value of these money market mutual funds approximates cost.

Derivative contracts are recorded on the Consolidated Balance Sheets as either assets or liabilities and are stated at estimated fair value unless they are designated as normal purchase or normal sales and qualify for the exception afforded by GAAP. When available, the fair value of derivative contracts is estimated using unadjusted quoted prices for identical contracts in the market in which Eastern Energy Gas transacts. When quoted prices for identical contracts are not available, Eastern Energy Gas uses forward price curves. Forward price curves represent Eastern Energy Gas' estimates of the prices at which a buyer or seller could contract today for delivery or settlement at future dates. Eastern Energy Gas bases its forward price curves upon market price quotations, when available, or internally developed and commercial models, with internal and external fundamental data inputs. Market price quotations are obtained from independent brokers, exchanges, direct communication with market participants and actual transactions executed by Eastern Energy Gas. Market price quotations are generally readily obtainable for the applicable term of Eastern Energy Gas' outstanding derivative contracts; therefore, Eastern Energy Gas' forward price curves reflect observable market quotes. Market price quotations for certain natural gas trading hubs are not as readily obtainable due to the length of the contracts. Given that limited market data exists for these contracts, as well as for those contracts that are not actively traded, Eastern Energy Gas uses forward price curves derived from internal models based on perceived pricing relationships to major trading hubs that are based on unobservable inputs. The estimated fair value of these derivative contracts is a function of underlying forward commodity prices, interest rates, currency rates, related volatility, counterparty creditworthiness and duration of contracts.

Eastern Energy Gas' long-term debt is carried at cost, including unamortized premiums, discounts and debt issuance costs as applicable, on the Consolidated Balance Sheets. The fair value of Eastern Energy Gas' long-term debt is a Level 2 fair value measurement and has been estimated based upon quoted market prices, where available, or at the present value of future cash flows discounted at rates consistent with comparable maturities with similar credit risks. The carrying value of Eastern Energy Gas' variable-rate long-term debt approximates fair value because of the frequent repricing of these instruments at market rates. The following table presents the carrying value and estimated fair value of Eastern Energy Gas' long-term debt (in millions):

	As of March 31, 2021		As of December 31, 2020	
	Carrying Value	Fair Value	Carrying Value	Fair Value
Long-term debt	\$ 4,414	\$ 4,744	\$ 4,425	\$ 5,012

(8) Commitments and Contingencies

Legal Matters

Eastern Energy Gas is party to a variety of legal actions arising out of the normal course of business. Plaintiffs occasionally seek punitive or exemplary damages. Eastern Energy Gas does not believe that such normal and routine litigation will have a material impact on its consolidated financial results.

Environmental Laws and Regulations

Eastern Energy Gas is subject to federal, state and local laws and regulations regarding climate change, air and water quality, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact its current and future operations. Eastern Energy Gas believes it is in material compliance with all applicable laws and regulations.

(9) Revenue from Contracts with Customers

The following table summarizes Eastern Energy Gas' energy products and services revenue by regulated and nonregulated (in millions):

	Three-Month Periods Ended March 31,	
	2021	2020
Customer Revenue:		
Regulated:		
Gas transportation and storage	\$ 279	\$ 344
Wholesale	17	2
Other	—	1
Total regulated	296	347
Nonregulated	190	208
Total Customer Revenue	486	555
Other revenue	—	1
Total operating revenue	\$ 486	\$ 556

Remaining Performance Obligations

The following table summarizes Eastern Energy Gas' revenue it expects to recognize in future periods related to significant unsatisfied remaining performance obligations for fixed contracts with expected durations in excess of one year as of March 31, 2021 (in millions):

	Performance obligations expected to be satisfied		Total
	Less than 12 months	More than 12 months	
Eastern Energy Gas	\$ 1,564	\$ 16,115	\$ 17,679

(10) Components of Accumulated Other Comprehensive Loss, Net

The following table shows the change in accumulated other comprehensive loss by each component of other comprehensive income (loss), net of applicable income tax (in millions):

	Unrecognized Amounts On Retirement Benefits	Unrealized Losses on Cash Flow Hedges	Noncontrolling Interests	Accumulated Other Comprehensive Loss, Net
Balance, December 31, 2019	\$ (106)	\$ (81)	\$ —	\$ (187)
Other comprehensive income (loss)	1	(85)	—	(84)
Balance, March 31, 2020	<u>\$ (105)</u>	<u>\$ (166)</u>	<u>\$ —</u>	<u>\$ (271)</u>
Balance, December 31, 2020	\$ (12)	\$ (51)	\$ 10	\$ (53)
Other comprehensive income (loss)	2	10	(4)	8
Balance, March 31, 2021	<u>\$ (10)</u>	<u>\$ (41)</u>	<u>\$ 6</u>	<u>\$ (45)</u>

(11) Variable Interest Entities

The primary beneficiary of a variable interest entity ("VIE") is required to consolidate the VIE and to disclose certain information about its significant variable interests in the VIE. The primary beneficiary of a VIE is the entity that has both 1) the power to direct the activities that most significantly impact the entity's economic performance and 2) the obligation to absorb losses or receive benefits from the entity that could potentially be significant to the VIE.

In November 2019, DEI contributed to Eastern Energy Gas a 75% controlling limited partner interest in Cove Point. In December 2019, DEI sold its retained 25% noncontrolling limited partner interest in Cove Point. As part of the GT&S Transaction, Eastern Energy Gas finalized a restructuring which included the disposition of a 50% noncontrolling interest in Cove Point to DEI, which resulted in Eastern Energy Gas owning 100% of the general partner interest and 25% of the limited partnership interest in Cove Point. Eastern Energy Gas concluded that Cove Point is a VIE due to the limited partners lacking the characteristics of a controlling financial interest. Eastern Energy Gas is the primary beneficiary of Cove Point as it has the power to direct the activities that most significantly impact its economic performance as well as the obligation to absorb losses and benefits which could be significant to it.

Eastern Energy Gas purchased shared services from Carolina Gas Services, Inc. ("Carolina Gas Services") an affiliated VIE, of \$3 million and \$4 million for the three-month periods ended March 31, 2021 and 2020, respectively. Eastern Energy Gas' Consolidated Balance Sheets included amounts due to Carolina Gas Services of \$26 million and \$22 million as of March 31, 2021 and December 31, 2020, respectively. Eastern Energy Gas determined that neither it nor any of its consolidated entities is the primary beneficiary of Carolina Gas Services as neither it nor any of its consolidated entities has both the power to direct the activities that most significantly impact its economic performance as well as the obligation to absorb losses and benefits which could be significant to them. Carolina Gas Services provides marketing and operational services. Neither Eastern Energy Gas nor any of its consolidated entities has any obligation to absorb more than its allocated share of Carolina Gas Services costs.

Prior to the GT&S Transaction, Eastern Energy Gas purchased shared services from Dominion Energy Questar Pipeline Services, Inc. ("DEQPS"), an affiliated VIE, of \$7 million for the three-month period ended March 31, 2020. Eastern Energy Gas determined that neither it nor any of its consolidated entities was the primary beneficiary of DEQPS, as neither it nor any of its consolidated entities has both the power to direct the activities that most significantly impact their economic performance as well as the obligation to absorb losses and benefits which could be significant to them. DEQPS provided marketing and operational services. Neither Eastern Energy Gas nor any of its consolidated entities had any obligation to absorb more than its allocated share of DEQPS costs.

Prior to the GT&S Transaction, Eastern Energy Gas purchased shared services from Dominion Energy Services, Inc. ("DES"), an affiliated VIE, of \$31 million for the three-month period ended March 31, 2020. Eastern Energy Gas determined that neither it nor any of its consolidated entities was the primary beneficiary of DES as neither it nor any of its consolidated entities had both the power to direct the activities that most significantly impact their economic performance as well as the obligation to absorb losses and benefits which could be significant to them. DES provided accounting, legal, finance and certain administrative and technical services. Neither Eastern Energy Gas nor any of its consolidated entities had any obligation to absorb more than its allocated share of DES costs.

(12) Related Party Transactions

Transactions Prior to the GT&S Transaction

Prior to the GT&S Transaction, Eastern Energy Gas engaged in related party transactions primarily with other DEI subsidiaries (affiliates). Eastern Energy Gas' receivable and payable balances with affiliates were settled based on contractual terms or on a monthly basis, depending on the nature of the underlying transactions. Through October 31, 2020, Eastern Energy Gas was included in DEI's consolidated federal income tax return and, where applicable, combined state income tax returns. All affiliate payables or receivables were settled with DEI prior to the closing of the GT&S Transaction.

Eastern Energy Gas transacted with affiliates for certain quantities of natural gas and other commodities at market prices in the ordinary course of business. Additionally, Eastern Energy Gas provided transportation and storage services to affiliates. Eastern Energy Gas also entered into certain other contracts with affiliates, and related parties, including construction services, which were presented separately from contracts involving commodities or services. Eastern Energy Gas participated in certain DEI benefit plans as described in Note 6.

DES, Carolina Gas Services, DEQPS and other affiliates provided accounting, legal, finance and certain administrative and technical services to Eastern Energy Gas. Eastern Energy Gas provided certain services to related parties, including technical services.

The financial statements for the three-month period ended March 31, 2020 include costs for certain general, administrative and corporate expenses assigned by DES, Carolina Gas Services and DEQPS to Eastern Energy Gas on the basis of direct and allocated methods in accordance with Eastern Energy Gas' services agreements with DES, Carolina Gas Services and DEQPS. Where costs incurred cannot be determined by specific identification, the costs were allocated based on the proportional level of effort devoted by DES, Carolina Gas Services and DEQPS resources that is attributable to the entity, determined by reference to number of employees, salaries and wages and other similar measures for the relevant DES service. Management believes the assumptions and methodologies underlying the allocation of general corporate overhead expenses are reasonable.

Subsequent to the GT&S Transaction, and with the exception of Cove Point, Eastern Energy Gas' transactions with other DEI subsidiaries are no longer related-party transactions.

Presented below are Eastern Energy Gas' significant transactions with DES, Carolina Gas Services, DEQPS and other affiliated and related parties for the three-month period ended March 31, 2020 (in millions):

Sales of natural gas and transportation and storage services	\$	64
Purchases of natural gas and transportation and storage services		3
Services provided by related parties ⁽¹⁾		43
Services provided to related parties ⁽²⁾		32

(1) Includes capitalized expenditures of \$3 million.

(2) Amount primarily attributable to Atlantic Coast Pipeline, LLC, a related-party VIE prior to the GT&S Transaction.

Interest income related to Eastern Energy Gas' affiliated notes receivable from DEI was \$11 million for the three-month period ended March 31, 2020.

Interest income related to Eastern Energy Gas' affiliated notes receivable from East Ohio Gas Company was \$18 million for the three-month period ended March 31, 2020.

For the three-month period ended March 31, 2020, Eastern Energy Gas distributed \$37 million to DEI.

Transactions Subsequent to the GT&S Transaction

Eastern Energy Gas is party to a tax-sharing agreement and is part of the Berkshire Hathaway consolidated United States federal income tax return. For current federal and state income taxes, Eastern Energy Gas had a receivable from BHE of \$21 million and \$20 million as of March 31, 2021 and December 31, 2020, respectively.

DEI, BHE, MidAmerican Energy, Northern Natural Gas Company and other related parties provided accounting, human resources, information technology and certain other administrative and technical services to Eastern Energy Gas, which totaled \$7 million for the three-month period ended March 31, 2021. Eastern Energy Gas provided certain services to affiliates, including administrative and technical services, which totaled \$9 million for the three-month period ended March 31, 2021. Eastern Energy Gas also provided transportation and storage services to affiliates, which totaled \$7 million for the three-month period ended March 31, 2021. Other assets included amounts due from an affiliate of \$6 million and \$7 million as of March 31, 2021 and December 31, 2020, respectively.

Eastern Energy Gas has a \$400 million intercompany revolving credit agreement from its parent, BHE GT&S, LLC ("BHE GT&S") expiring in November 2021. The credit facility, which is for general corporate purposes and provide for the issuance of letters of credit, has a variable interest rate based on London Interbank Offered Rate ("LIBOR") plus a fixed spread. As of March 31, 2021 and December 31, 2020, \$— million and \$9 million, respectively, was outstanding under the credit agreement.

BHE GT&S has an intercompany revolving credit agreement from Eastern Energy Gas expiring in December 2021. In March 2021, BHE GT&S increased its credit facility limit from \$200 million to \$400 million. The credit agreement has a variable interest rate based on LIBOR plus a fixed spread. As of March 31, 2021 and December 31, 2020, \$234 million and \$124 million, respectively, was outstanding under the credit agreement.

Eastern Energy Gas participates in certain MidAmerican Energy benefit plans as described in Note 6. As of March 31, 2021 and December 31, 2020, Eastern Energy Gas' amount due to MidAmerican Energy associated with these plans and reflected in other long-term liabilities on the Consolidated Balance Sheets was \$110 million and \$115 million, respectively.

Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations

The following is management's discussion and analysis of certain significant factors that have affected the consolidated financial condition and results of operations of Eastern Energy Gas during the periods included herein. This discussion should be read in conjunction with Eastern Energy Gas' historical Consolidated Financial Statements and Notes to Consolidated Financial Statements in Part I, Item 1 of this Form 10-Q. Eastern Energy Gas' actual results in the future could differ significantly from the historical results.

Results of Operations for the First Quarter of 2021 and 2020

Overview

Net income for the first three months of 2021 was \$89 million, a decrease of \$80 million compared to 2020. Net income decreased primarily a result of the GT&S Transaction consisting of an increase in net income attributable to noncontrolling interests due to DEI's 50% noncontrolling interest in Cove Point LNG, LP ("Cove Point") of \$69 million and the absence of Questar Pipeline Group operations of \$23 million.

Quarter Ended March 31, 2021 Compared to Quarter Ended March 31, 2020

Operating revenue decreased \$70 million, or 13%, for the first quarter of 2021 compared to 2020, primarily due to the absence of Questar Pipeline Group operations of \$64 million and a decrease in services performed for Atlantic Coast Pipeline, LLC of \$17 million, which is offset in operations and maintenance expense. The decrease in operating revenue was partially offset by an increase in regulated gas sales primarily due to increased volumes of \$17 million.

Cost of gas decreased \$8 million, or 100%, for the first quarter of 2021 compared to 2020, primarily due to favorable prices of \$19 million and the absence of Questar Pipeline Group operations of \$2 million, partially offset by an increase in volumes sold of \$14 million.

Operations and maintenance decreased \$44 million, or 26%, for the first quarter of 2021 compared to 2020, primarily due to a decrease in services performed for Atlantic Coast Pipeline, LLC of \$17 million and the absence of Questar Pipeline Group operations of \$15 million.

Depreciation and amortization decreased \$13 million, or 14%, for the first quarter of 2021 compared to 2020, primarily due to the absence of Questar Pipeline Group.

Interest expense decreased \$14 million, or 24%, for the first quarter of 2021 compared to 2020, primarily due to lower interest expense of \$7 million from the repayment of \$700 million of long-term debt in the fourth quarter of 2020 and the absence of interest expense related to Questar Pipeline Group of \$5 million.

Interest and dividend income decreased \$30 million, or 100%, for the first quarter of 2021 compared to 2020, primarily due to the absence of interest income from the East Ohio Gas Company of \$18 million and DEI of \$11 million.

Other, net decreased \$13 million, or 93%, for the first quarter of 2021 compared to 2020, primarily due to a decrease in non-service cost credits related to certain Eastern Energy Gas benefit plans that were retained by DEI as a result of the GT&S Transaction.

Income tax expense decreased \$25 million for the first quarter of 2021 compared to 2020 and the effective tax rate was 13% for the first quarter of 2021 and 22% for the first quarter of 2020. The effective tax rate decreased primarily due to the change in the noncontrolling interest of Cove Point and lower pre-tax income as a result of the GT&S Transaction.

Net income attributable to noncontrolling interests increased \$69 million, or 209%, for the first quarter of 2021 compared to 2020 primarily due to DEI's 50% interest in Cove Point effective with the GT&S Transaction.

Liquidity and Capital Resources

As of March 31, 2021, Eastern Energy Gas' total net liquidity was \$506 million as follows (in millions):

Cash and cash equivalents	\$	106
Intercompany credit agreement ⁽¹⁾		400
Less:		
Notes payable		—
Net intercompany credit agreement		400
Total net liquidity	\$	506
Intercompany credit agreement:		
Maturity date		2021

(1) Refer to Note 12 of Notes to Consolidated Financial Statements in Part I, Item 1 of this Form 10-Q for further discussion regarding Eastern Energy Gas' intercompany credit agreement.

Operating Activities

Net cash flows from operating activities for the three-month periods ended March 31, 2021 and 2020 were \$241 million and \$667 million, respectively. The change was primarily due to decreased repayments of affiliated receivables by DEI subsidiaries in 2021 and the absence of the Questar Pipeline Group.

The timing of Eastern Energy Gas' income tax cash flows from period to period can be significantly affected by the estimated federal income tax payment methods elected and assumptions for each payment date.

Investing Activities

Net cash flows from investing activities for the three-month periods ended March 31, 2021 and 2020 were \$(56) million and \$(342) million, respectively. The change was primarily due to the absence of loans to affiliates of \$262 million.

Financing Activities

Net cash flows from financing activities for the three-month period ended March 31, 2021 were \$(118) million. Uses of cash totaled \$(118) million and consisted mainly of distributions to noncontrolling interests from Cove Point of \$109 million.

Net cash flows from financing activities for the three-month period ended March 31, 2020 were \$(306) million. Uses of cash totaled \$306 million and consisted mainly of distributions of \$269 million and repayments of short-term debt of \$32 million.

Future Uses of Cash

Eastern Energy Gas has available a variety of sources of liquidity and capital resources, both internal and external, including net cash flows from operating activities, public and private debt offerings, the use of credit agreements, capital contributions and other sources. These sources are expected to provide funds required for current operations, capital expenditures, acquisitions, investments, debt retirements and other capital requirements. The availability and terms under which Eastern Energy Gas and each subsidiary has access to external financing depends on a variety of factors, including regulatory approvals, Eastern Energy Gas' credit ratings, investors' judgment of risk and conditions in the overall capital markets, including the condition of the utility industry.

Capital Expenditures

Capital expenditure needs are reviewed regularly by management and may change significantly as a result of these reviews, which may consider, among other factors, changes in environmental and other rules and regulations; impacts to customers' rates; outcomes of regulatory proceedings; changes in income tax laws; general business conditions; system reliability standards; the cost and efficiency of construction labor, equipment and materials; commodity prices; and the cost and availability of capital. Expenditures for certain assets may ultimately include acquisition of existing assets.

Eastern Energy Gas' historical and forecasted capital expenditures, each of which exclude amounts for non-cash equity AFUDC and other non-cash items, are as follows (in millions):

	Three-Month Periods		Annual
	Ended March 31,		Forecast
	2020	2021	2021
Natural gas transmission and storage	\$ 23	\$ 8	\$ 30
Other	53	47	432
Total	<u>\$ 76</u>	<u>\$ 55</u>	<u>\$ 462</u>

Eastern Energy Gas' natural gas transmission and storage capital expenditures primarily include growth capital expenditures related to planned regulated projects. Eastern Energy Gas' other capital expenditures consist primarily of non-regulated and routine capital expenditures for natural gas transmission, storage and liquefied natural gas terminalling infrastructure needed to serve existing and expected demand.

Contractual Obligations

As of March 31, 2021, there have been no material changes outside the normal course of business in contractual obligations from the information provided in Item 7 of Eastern Energy Gas' Annual Report on Form 10-K for the year ended December 31, 2020.

Regulatory Matters

Eastern Energy Gas is subject to comprehensive regulation. Refer to Note 4 of Notes to Consolidated Financial Statements in Part I, Item 1 of this Form 10-Q for discussion regarding Eastern Energy Gas' current regulatory matters.

Environmental Laws and Regulations

Eastern Energy Gas is subject to federal, state and local laws and regulations regarding climate change, air and water quality, hazardous and solid waste disposal, protected species and other environmental matters that have the potential to impact its current and future operations. In addition to imposing continuing compliance obligations and capital expenditure requirements, these laws and regulations provide regulators with the authority to levy substantial penalties for noncompliance, including fines, injunctive relief and other sanctions. These laws and regulations are administered by various federal, state and local agencies. Eastern Energy Gas believes it is in material compliance with all applicable laws and regulations, although many laws and regulations are subject to interpretation that may ultimately be resolved by the courts.

Refer to "Environmental Laws and Regulations" in Berkshire Hathaway Energy's Part I, Item 2 of this Form 10-Q for additional information regarding environmental laws and regulations.

Critical Accounting Estimates

Certain accounting measurements require management to make estimates and judgments concerning transactions that will be settled several years in the future. Amounts recognized on the Consolidated Financial Statements based on such estimates involve numerous assumptions subject to varying and potentially significant degrees of judgment and uncertainty and will likely change in the future as additional information becomes available. Estimates are used for, but not limited to, the accounting for the effects of certain types of regulation, impairment of goodwill and long-lived assets and income taxes. For additional discussion of Eastern Energy Gas' critical accounting estimates, see Item 7 of Eastern Energy Gas' Annual Report on Form 10-K for the year ended December 31, 2020. There have been no significant changes in Eastern Energy Gas' assumptions regarding critical accounting estimates since December 31, 2020.

Item 3. Quantitative and Qualitative Disclosures About Market Risk

For quantitative and qualitative disclosures about market risk affecting the Registrants, see Item 7A of each Registrant's Annual Report on Form 10-K for the year ended December 31, 2020. Each Registrant's exposure to market risk and its management of such risk has not changed materially since December 31, 2020. Refer to Note 6 of the Notes to Consolidated Financial Statements of PacifiCorp in Part I, Item 1 of this Form 10-Q for disclosure of the respective Registrant's derivative positions as of March 31, 2021.

Item 4. Controls and Procedures

At the end of the period covered by this Quarterly Report on Form 10-Q, each of Berkshire Hathaway Energy Company, PacifiCorp, MidAmerican Funding, LLC, MidAmerican Energy Company, Nevada Power Company, Sierra Pacific Power Company and Eastern Energy Gas Holdings, LLC carried out separate evaluations, under the supervision and with the participation of each such entity's management, including its Chief Executive Officer (principal executive officer) and its Chief Financial Officer (principal financial officer), or persons performing similar functions, of the effectiveness of the design and operation of its disclosure controls and procedures (as defined in Rule 13a-15(e) promulgated under the Securities Exchange Act of 1934, as amended). Based upon these evaluations, management of each such entity, including its Chief Executive Officer (principal executive officer) and its Chief Financial Officer (principal financial officer), or persons performing similar functions, in each case, concluded that the disclosure controls and procedures for such entity were effective to ensure that information required to be disclosed by such entity in the reports that it files or submits under the Securities Exchange Act of 1934, as amended, is recorded, processed, summarized and reported within the time periods specified in the United States Securities and Exchange Commission's rules and forms, and is accumulated and communicated to its management, including its Chief Executive Officer (principal executive officer) and its Chief Financial Officer (principal financial officer), or persons performing similar functions, in each case, as appropriate to allow timely decisions regarding required disclosure by it. Each such entity hereby states that there has been no change in its internal control over financial reporting during the quarter ended March 31, 2021 that has materially affected, or is reasonably likely to materially affect, its internal control over financial reporting.

PART II

Item 1. Legal Proceedings

Berkshire Hathaway Energy and PacifiCorp

On September 30, 2020, a putative class action complaint against PacifiCorp was filed, captioned *Jeanyne James et al. v. PacifiCorp et al.*, Case No. 20cv33885, Circuit Court, Multnomah County, Oregon. The complaint was filed by Oregon residents and businesses who seek to represent a class of all Oregon citizens and entities whose real or personal property was harmed beginning on September 7, 2020, by wildfires in Oregon allegedly caused by PacifiCorp. The complaint alleges that PacifiCorp's assets contributed to the Oregon wildfires occurring on or after September 7, 2020 and that PacifiCorp acted with gross negligence, among other things. The complaint was amended November 2, 2020, and seeks the following damages: (i) damages for real and personal property and other economic losses in excess of \$600 million; (ii) double the amount of property and economic damages based on alleged gross negligence; (iii) treble damages for specific costs associated with loss of timber, trees and shrubbery; (iv) double the damages for the costs of litigation and reforestation; and (v) prejudgment interest. The plaintiffs demand a trial by jury and have reserved their right to amend the complaint to allege claims for punitive damages.

On March 12, 2021, a complaint against PacifiCorp was filed, captioned *Shyla Zeober et al. v. PacifiCorp*, Case No. 21cv09339, Circuit Court, Marion County, Oregon. The complaint was filed by Oregon residents and businesses who allege that they were injured by the Beachie Creek Fire, which the plaintiffs allege began on or around September 7, 2020, but which government reports indicate began on or around August 16, 2020. The complaint alleges that PacifiCorp's assets contributed to the Beachie Creek Fire and that PacifiCorp acted with gross negligence, among other things. The complaint seeks the following damages: (i) damages for real and personal property and other economic losses in an amount determined by the jury to be fair and reasonable, but not to exceed \$150 million; and (ii) noneconomic damages in the amount determined by the jury to be fair and reasonable, but not to exceed \$500 million. The plaintiffs demand a trial by jury and have reserved their right to amend the complaint.

On March 15, 2021, a complaint against PacifiCorp was filed, captioned *Shylo Salter et al. v. PacifiCorp*, Case No. 21cv09520, Circuit Court, Marion County, Oregon. The complaint was filed by Oregon residents and businesses who allege that they were injured by the Beachie Creek Fire, which the plaintiffs allege began on or around September 7, 2020, but which government reports indicate began on or around August 16, 2020. The complaint alleges that PacifiCorp's assets contributed to the Beachie Creek Fire and that PacifiCorp acted with gross negligence, among other things. The complaint seeks the following damages: (i) damages for real and personal property and other economic losses in an amount determined by the jury to be fair and reasonable, but not to exceed \$150 million; and (ii) noneconomic damages in the amount determined by the jury to be fair and reasonable, but not to exceed \$500 million. The plaintiffs demand a trial by jury and have reserved their right to amend the complaint.

Other individual lawsuits alleging similar claims have been filed in Oregon and California related to the 2020 Wildfires. Investigations into the causes and origins of those wildfires are ongoing. For more information regarding certain legal proceedings affecting Berkshire Hathaway Energy, refer to Note 9 of the Notes to Consolidated Financial Statements of Berkshire Hathaway Energy in Part I, Item 1 of this Form 10-Q, and PacifiCorp, refer to Note 8 of the Notes to Consolidated Financial Statements of PacifiCorp in Part I, Item 1 of this Form 10-Q.

Item 1A. Risk Factors

There has been no material change to each Registrant's risk factors from those disclosed in Item 1A of each Registrant's Annual Report on Form 10-K for the year ended December 31, 2020.

Item 2. Unregistered Sales of Equity Securities and Use of Proceeds

Not applicable.

Item 3. Defaults Upon Senior Securities

Not applicable.

Item 4. Mine Safety Disclosures

Information regarding Berkshire Hathaway Energy's and PacifiCorp's mine safety violations and other legal matters disclosed in accordance with Section 1503(a) of the Dodd-Frank Wall Street Reform and Consumer Protection Act is included in Exhibit 95 to this Form 10-Q.

Item 5. Other Information

Not applicable.

Item 6. Exhibits

The following is a list of exhibits filed as part of this Quarterly Report.

Exhibit No.	Description
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BERKSHIRE HATHAWAY ENERGY	
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| 4.1 | Fiscal Agency Agreement, dated as of April 9, 2021, by and between Northern Natural Gas Company and The Bank of New York Mellon Trust Company, N.A., Fiscal Agent, relating to the \$550,000,000 in principal amount of the 3.40% Senior Notes due 2051. |
| 15.1 | Awareness Letter of Independent Registered Public Accounting Firm. |
| 31.1 | Principal Executive Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002. |
| 31.2 | Principal Financial Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002. |
| 32.1 | Principal Executive Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002. |
| 32.2 | Principal Financial Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002. |

PACIFICORP	
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| 15.2 | Awareness Letter of Independent Registered Public Accounting Firm. |
| 31.3 | Principal Executive Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002. |
| 31.4 | Principal Financial Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002. |
| 32.3 | Principal Executive Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002. |
| 32.4 | Principal Financial Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002. |

BERKSHIRE HATHAWAY ENERGY AND PACIFICORP	
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| 95 | Mine Safety Disclosures Required by the Dodd-Frank Wall Street Reform and Consumer Protection Act. |
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MIDAMERICAN ENERGY	
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| 15.3 | Awareness Letter of Independent Registered Public Accounting Firm. |
| 31.5 | Principal Executive Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002. |
| 31.6 | Principal Financial Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002. |
| 32.5 | Principal Executive Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002. |
| 32.6 | Principal Financial Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002. |

MIDAMERICAN FUNDING	
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| 31.7 | Principal Executive Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002. |
| 31.8 | Principal Financial Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002. |
| 32.7 | Principal Executive Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002. |
| 32.8 | Principal Financial Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002. |

NEVADA POWER	
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- | | |
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| 15.4 | Awareness Letter of Independent Registered Public Accounting Firm. |
| 31.9 | Principal Executive Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002. |
| 31.10 | Principal Financial Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002. |
| 32.9 | Principal Executive Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002. |
| 32.10 | Principal Financial Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002. |

SIERRA PACIFIC

- 31.11 [Principal Executive Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002.](#)
- 31.12 [Principal Financial Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002.](#)
- 32.11 [Principal Executive Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002.](#)
- 32.12 [Principal Financial Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002.](#)

EASTERN ENERGY GAS

- 31.13 [Principal Executive Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002.](#)
- 31.14 [Principal Financial Officer Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002.](#)
- 32.13 [Principal Executive Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002.](#)
- 32.14 [Principal Financial Officer Certification Pursuant to Section 906 of the Sarbanes-Oxley Act of 2002.](#)

ALL REGISTRANTS

- 101 The following financial information from each respective Registrant's Quarterly Report on Form 10-Q for the quarter ended March 31, 2021, is formatted in iXBRL (Inline eXtensible Business Reporting Language) and included herein: (i) the Consolidated Balance Sheets, (ii) the Consolidated Statements of Operations, (iii) the Consolidated Statements of Comprehensive Income, (iv) the Consolidated Statements of Changes in Equity, (v) the Consolidated Statements of Cash Flows, and (vi) the Notes to Consolidated Financial Statements, tagged in summary and detail.
- 104 Cover Page Interactive Data File formatted in iXBRL (Inline eXtensible Business Reporting Language) and contained in Exhibit 101.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, each registrant has duly caused this report to be signed on its behalf by the undersigned thereunto duly authorized.

BERKSHIRE HATHAWAY ENERGY COMPANY

Date: April 30, 2021

/s/ Calvin D. Haack

Calvin D. Haack

Senior Vice President and Chief Financial Officer
(principal financial and accounting officer)

PACIFICORP

Date: April 30, 2021

/s/ Nikki L. Kobliha

Nikki L. Kobliha

Vice President, Chief Financial Officer and Treasurer
(principal financial and accounting officer)

MIDAMERICAN FUNDING, LLC MIDAMERICAN ENERGY COMPANY

Date: April 30, 2021

/s/ Thomas B. Specketer

Thomas B. Specketer

Vice President and Controller
of MidAmerican Funding, LLC and
Vice President and Chief Financial Officer
of MidAmerican Energy Company
(principal financial and accounting officer)

NEVADA POWER COMPANY

Date: April 30, 2021

/s/ Michael E. Cole

Michael E. Cole

Vice President, Chief Financial Officer and Treasurer
(principal financial and accounting officer)

SIERRA PACIFIC POWER COMPANY

Date: April 30, 2021

/s/ Michael E. Cole

Michael E. Cole

Vice President, Chief Financial Officer and Treasurer
(principal financial and accounting officer)

EASTERN ENERGY GAS HOLDINGS, LLC

Date: April 30, 2021

/s/ Scott C. Miller

Scott C. Miller

Vice President, Chief Financial Officer and Treasurer
(principal financial and accounting officer)

April 30, 2021

To the Board of Directors and Shareholders of
Berkshire Hathaway Energy Company
666 Grand Ave,
Des Moines, Iowa 50306

We are aware that our report dated April 30, 2021, on our review of the interim financial information of Berkshire Hathaway Energy Company appearing in this Quarterly Report on Form 10-Q for the quarter ended March 31, 2021, is incorporated by reference in Registration Statement No. 333-228511 on Form S-8.

/s/ Deloitte & Touche LLP

Des Moines, Iowa

April 30, 2021

The Board of Directors and Shareholders of
PacifiCorp
825 N.E. Multnomah Street
Portland, Oregon 97232

We are aware that our report dated April 30, 2021, on our review of the interim financial information of PacifiCorp and subsidiaries appearing in this Quarterly Report on Form 10-Q for the quarter ended March 31, 2021, is incorporated by reference in Registration Statement No. 333-249044 on Form S-3.

/s/ Deloitte & Touche LLP

Portland, Oregon

April 30, 2021

To the Board of Directors and Shareholder of
MidAmerican Energy Company
Des Moines, Iowa

We are aware that our report dated April 30, 2021, on our review of the interim financial information of MidAmerican Energy Company appearing in this Quarterly Report on Form 10-Q for the quarter ended March 31, 2021, is incorporated by reference in Registration Statement No. 333-225916 on Form S-3.

/s/ Deloitte & Touche LLP

Des Moines, Iowa

April 30, 2021

To the Board of Directors and Shareholder of
Nevada Power Company
Las Vegas, Nevada

We are aware that our report dated April 30, 2021 on our review of the interim financial information of Nevada Power Company and subsidiaries appearing in this Quarterly Report on Form 10-Q for the quarter ended March 31, 2021, is incorporated by reference in Registration Statement No. 333-234207 on Form S-3.

/s/ Deloitte & Touche LLP

Las Vegas, Nevada

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, William J. Fehrman, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of Berkshire Hathaway Energy Company;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ William J. Fehrman

William J. Fehrman

President and Chief Executive Officer
(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Calvin D. Haack, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of Berkshire Hathaway Energy Company;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Calvin D. Haack

Calvin D. Haack

Senior Vice President and Chief Financial Officer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, William J. Fehrman, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of PacifiCorp;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ William J. Fehrman

William J. Fehrman

Chairman of the Board of Directors and Chief Executive Officer
(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Nikki L. Kobliha, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of PacifiCorp;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Nikki L. Kobliha

Nikki L. Kobliha

Vice President, Chief Financial Officer and Treasurer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Kelcey A. Brown, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of MidAmerican Energy Company;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Kelcey A. Brown

Kelcey A. Brown

President and Chief Executive Officer

(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Thomas B. Specketer, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of MidAmerican Energy Company;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Thomas B. Specketer
Thomas B. Specketer
Vice President and Chief Financial Officer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Kelcey A. Brown, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of MidAmerican Funding, LLC;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Kelcey A. Brown
Kelcey A. Brown
President
(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Thomas B. Specketer, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of MidAmerican Funding, LLC;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Thomas B. Specketer
Thomas B. Specketer
Vice President and Controller
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Douglas A. Cannon, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of Nevada Power Company (dba NV Energy);
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Douglas A. Cannon

Douglas A. Cannon

President and Chief Executive Officer

(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Michael E. Cole, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of Nevada Power Company (dba NV Energy);
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Michael E. Cole

Michael E. Cole

Vice President, Chief Financial Officer and Treasurer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Douglas A. Cannon, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of Sierra Pacific Power Company (dba NV Energy);
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Douglas A. Cannon

Douglas A. Cannon

President and Chief Executive Officer

(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Michael E. Cole, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of Sierra Pacific Power Company (dba NV Energy);
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Michael E. Cole

Michael E. Cole

Vice President, Chief Financial Officer and Treasurer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Paul E. Ruppert, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of Eastern Energy Gas Holdings, LLC;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Paul E. Ruppert
Paul E. Ruppert
President
(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 302 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Scott C. Miller, certify that:

1. I have reviewed this Quarterly Report on Form 10-Q of Eastern Energy Gas Holdings, LLC;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: April 30, 2021

/s/ Scott C. Miller

Scott C. Miller

Vice President, Chief Financial Officer and Treasurer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, William J. Fehrman, President and Chief Executive Officer of Berkshire Hathaway Energy Company (the "Company"), certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of the Company for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of the Company.

Date: April 30, 2021

/s/ William J. Fehrman

William J. Fehrman

President and Chief Executive Officer
(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Calvin D. Haack, Senior Vice President and Chief Financial Officer of Berkshire Hathaway Energy Company (the "Company"), certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of the Company for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of the Company.

Date: April 30, 2021

/s/ Calvin D. Haack

Calvin D. Haack

Senior Vice President and Chief Financial Officer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, William J. Fehrman, Chairman of the Board of Directors and Chief Executive Officer of PacifiCorp, certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of PacifiCorp for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and results of operations of PacifiCorp.

Date: April 30, 2021

/s/ William J. Fehrman

William J. Fehrman

Chairman of the Board of Directors and Chief Executive Officer
(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Nikki L. Kobliha, Vice President, Chief Financial Officer and Treasurer of PacifiCorp, certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of PacifiCorp for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and results of operations of PacifiCorp.

Date: April 30, 2021

/s/ Nikki L. Kobliha

Nikki L. Kobliha

Vice President, Chief Financial Officer and Treasurer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Kelcey A. Brown, President and Chief Executive Officer of MidAmerican Energy Company, certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of MidAmerican Energy Company for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of MidAmerican Energy Company.

Date: April 30, 2021

/s/ Kelcey A. Brown

Kelcey A. Brown
President and Chief Executive Officer
(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Thomas B. Specketer, Vice President and Chief Financial Officer of MidAmerican Energy Company, certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of MidAmerican Energy Company for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of MidAmerican Energy Company.

Date: April 30, 2021

/s/ Thomas B. Specketer
Thomas B. Specketer
Vice President and Chief Financial Officer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Kelcey A. Brown, President of MidAmerican Funding, LLC, certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of MidAmerican Funding, LLC for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of MidAmerican Funding, LLC.

Date: April 30, 2021

/s/ Kelcey A. Brown
Kelcey A. Brown
President
(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Thomas B. Specketer, Vice President and Controller of MidAmerican Funding, LLC, certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of MidAmerican Funding, LLC for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of MidAmerican Funding, LLC.

Date: April 30, 2021

/s/ Thomas B. Specketer
Thomas B. Specketer
Vice President and Controller
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Douglas A. Cannon, President and Chief Executive Officer of Nevada Power Company (dba NV Energy), certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of Nevada Power Company for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of Nevada Power Company.

Date: April 30, 2021

/s/ Douglas A. Cannon
Douglas A. Cannon
President and Chief Executive Officer
(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Michael E. Cole, Vice President, Chief Financial Officer and Treasurer of Nevada Power Company (dba NV Energy), certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of Nevada Power Company for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of Nevada Power Company.

Date: April 30, 2021

/s/ Michael E. Cole

Michael E. Cole

Vice President, Chief Financial Officer and Treasurer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Douglas A. Cannon, President and Chief Executive Officer of Sierra Pacific Power Company (dba NV Energy), certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of Sierra Pacific Power Company for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of Sierra Pacific Power Company.

Date: April 30, 2021

/s/ Douglas A. Cannon
Douglas A. Cannon
President and Chief Executive Officer
(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Michael E. Cole, Vice President, Chief Financial Officer and Treasurer of Sierra Pacific Power Company (dba NV Energy), certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of Sierra Pacific Power Company for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of Sierra Pacific Power Company.

Date: April 30, 2021

/s/ Michael E. Cole

Michael E. Cole

Vice President, Chief Financial Officer and Treasurer
(principal financial officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Paul E. Ruppert, President of Eastern Energy Gas Holdings, LLC, certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of Eastern Energy Gas Holdings, LLC for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a) or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of Eastern Energy Gas Holdings, LLC.

Date: April 30, 2021

/s/ Paul E. Ruppert

Paul E. Ruppert

President

(principal executive officer)

**CERTIFICATION PURSUANT TO
SECTION 906 OF THE
SARBANES-OXLEY ACT OF 2002**

I, Scott C. Miller, Vice President, Chief Financial Officer and Treasurer of Eastern Energy Gas Holdings, LLC, certify, pursuant to Section 906 of the Sarbanes-Oxley Act of 2002, 18 U.S.C. Section 1350, that to the best of my knowledge:

- (1) the Quarterly Report on Form 10-Q of Eastern Energy Gas Holdings, LLC for the quarterly period ended March 31, 2021 (the "Report") fully complies with the requirements of section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a) or 78o(d)); and
- (2) the information contained in the Report fairly presents, in all material respects, the financial condition and result of operations of Eastern Energy Gas Holdings, LLC.

Date: April 30, 2021

/s/ Scott C. Miller

Scott C. Miller

Vice President, Chief Financial Officer and Treasurer
(principal financial officer)

**MINE SAFETY VIOLATIONS AND OTHER LEGAL MATTER DISCLOSURES
PURSUANT TO SECTION 1503(a) OF THE DODD-FRANK WALL STREET
REFORM AND CONSUMER PROTECTION ACT**

PacifiCorp and its subsidiaries operate certain coal mines and coal processing facilities (collectively, the "mining facilities") that are regulated by the Federal Mine Safety and Health Administration ("MSHA") under the Federal Mine Safety and Health Act of 1977 (the "Mine Safety Act"). MSHA inspects PacifiCorp's mining facilities on a regular basis. The total number of reportable Mine Safety Act citations, orders, assessments and legal actions for the three-month period ended March 31, 2021 are summarized in the table below and are subject to contest and appeal. The severity and assessment of penalties may be reduced or, in some cases, dismissed through the contest and appeal process. Amounts are reported regardless of whether PacifiCorp has challenged or appealed the matter. Mines that are closed or idled are not included in the information below as no reportable events occurred at those locations during the three-month period ended March 31, 2021. There were no mining-related fatalities during the three-month period ended March 31, 2021. PacifiCorp has not received any notice of a pattern, or notice of the potential to have a pattern, of violations of mandatory health or safety standards that are of such nature as could have significantly and substantially contributed to the cause and effect of coal or other mine health or safety hazards under Section 104(e) of the Mine Safety Act during the three-month period ended March 31, 2021.

	Mine Safety Act					Total Value of Proposed MSHA Assessments (in thousands)	Legal Actions		
	Section 104 Significant and Substantial Citations ⁽¹⁾	Section 104(b) Orders ⁽²⁾	Section 104(d) Citations/ Orders ⁽³⁾	Section 110(b)(2) Violations ⁽⁴⁾	Section 107(a) Imminent Danger Orders ⁽⁵⁾		Pending as of Last Day of Period ⁽⁶⁾	Instituted During Period	Resolved During Period
Mining Facilities									
Bridger (surface)	1	—	—	—	—	\$ —	—	—	—
Bridger (underground)	1	—	—	—	—	8	1	—	—
Wyodak Coal Crushing Facility	—	—	—	—	—	—	—	—	—

- (1) Citations for alleged violations of mandatory health and safety standards that could significantly or substantially contribute to the cause and effect of a safety or health hazard under Section 104 of the Mine Safety Act.
- (2) For alleged failure to totally abate the subject matter of a Mine Safety Act Section 104(a) citation within the period specified in the citation.
- (3) For alleged unwarrantable failure (i.e., aggravated conduct constituting more than ordinary negligence) to comply with a mandatory health or safety standard.
- (4) For alleged flagrant violations (i.e., reckless or repeated failure to make reasonable efforts to eliminate a known violation of a mandatory health or safety standard that substantially and proximately caused, or reasonably could have been expected to cause, death or serious bodily injury).
- (5) For the existence of any condition or practice in a coal or other mine which could reasonably be expected to cause death or serious physical harm before such condition or practice can be abated.
- (6) Amounts include one contest of proposed penalties under Subpart C of the Federal Mine Safety and Health Review Commission's procedural rules. The pending legal actions are not exclusive to citations, notices, orders and penalties assessed by the MSHA during the reporting period.

APPENDIX B

PacifiCorp
State of California
ECAC/GHG Application
Statement of Present and Proposed Rates

Tariff Schedules	Present Rates	Proposed Rates
Schedule D (Standard Residential)		
Basic Charge	\$7.73	\$7.73 /month
Energy Charge		
Baseline kWh	14.315	14.071 ¢/kWh
Non-Baseline kWh	16.277	16.033 ¢/kWh
Schedule DL-6 (Residential CARE)		
Basic Charge	\$6.18	\$6.18 /month
Energy Charge		
Baseline kWh	10.974	10.778 ¢/kWh
Non-Baseline kWh	12.543	12.348 ¢/kWh
Schedule A-25 Secondary		
Basic Charge		
1 Phase	\$14.91	\$14.91 /month
3 Phase	\$20.46	\$20.46 /month
Energy Charge	16.147	16.007 ¢/kWh
Schedule A-25 Primary		
Basic Charge		
1 Phase	\$14.91	\$14.91 /month
3 Phase	\$20.46	\$20.46 /month
Energy Charge	15.987	15.848 ¢/kWh
Schedule A-32 Secondary		
Basic Charge		
1 Phase	\$13.70	\$13.70 /month
3 Phase	\$18.80	\$18.80 /month
Distribution Demand Charge	\$1.72	\$1.72 /kW
Generation & Transmission Demand Charge	\$4.65	\$4.30 /kW
Energy Charge	11.691	11.618 ¢/kWh
Reactive Power	60.00	60.00 ¢/kVar
Schedule A-32 Primary		
Basic Charge		
1 Phase	\$13.70	\$13.70 /month
3 Phase	\$18.80	\$18.80 /month
Distribution Demand Charge	\$1.20	\$1.20 /kW
Generation & Transmission Demand Charge	\$4.65	\$4.30 /kW
Energy Charge	11.575	11.503 ¢/kWh
Reactive Power	60.00	60.00 ¢/kVar
High Voltage Charge	\$60.00	\$60.00 /month

PacifiCorp
State of California
ECAC/GHG Application
Statement of Present and Proposed Rates

Tariff Schedules	Present Rates	Proposed Rates
Schedule A-36 Secondary		
Basic Charge	\$244.32	\$244.32 /month
Distribution Demand Charge	\$3.16	\$3.16 /kW
Generation & Transmission Demand Charge	\$8.90	\$8.16 /kW
Energy Charge	9.183	9.015 ¢/kWh
Reactive Power	60.00	60.00 ¢/kVar
Schedule A-36 Primary		
Basic Charge	\$244.32	\$244.32 /month
Distribution Demand Charge	\$2.21	\$2.21 /kW
Generation & Transmission Demand Charge	\$8.90	\$8.16 /kW
Energy Charge	9.092	8.926 ¢/kWh
Reactive Power	60.00	60.00 ¢/kVar
High Voltage Charge	\$60.00	\$60.00 /month
Schedule AT-48 Secondary		
Basic Charge	\$442.05	\$442.05 /month
Distribution Demand Charge	\$1.89	\$1.89 /kW
Generation & Transmission Demand Charge (Summer)	\$7.37	\$6.68 /kW
Generation & Transmission Demand Charge (Winter)	\$8.00	\$7.31 /kW
Energy Charge	8.021	7.767 ¢/kWh
Reactive Power	60.00	60.00 ¢/kVar
Schedule AT-48 Primary/Transmission		
Basic Charge	\$442.05	\$442.05 /month
Distribution Demand Charge	\$1.32	\$1.32 /kW
Generation & Transmission Demand Charge (Summer)	\$7.37	\$6.68 /kW
Generation & Transmission Demand Charge (Winter)	\$8.00	\$7.31 /kW
Energy Charge	7.942	7.691 ¢/kWh
Reactive Power	60.00	60.00 ¢/kVar
High Voltage Charge	\$60.00	\$60.00 /month
Schedule PA-20		
Basic Charge - Annually (billed in November)		
1 Phase Any Size, 3 Phase <= 50kW	\$77.82	\$77.82
3 Phase Load Size > 50 kW	\$160.76	\$160.76
Distribution Demand Charge - Annually (billed in November)	\$17.15	\$17.15 /kW
Generation & Transmission Demand Charge	\$5.90	\$5.49 /kW
Energy Charge	10.344	10.241 ¢/kWh
Reactive Power	60.00	60.00 ¢/kVar

PacifiCorp
State of California
ECAC/GHG Application
Statement of Present and Proposed Rates

Tariff Schedules			Present Rates	Proposed Rates
Schedule OL-15				
	<i>lumen</i>	<i>kWh</i>		
Mercury Vapor	7,000	76	\$18.45	\$18.54 /Lamp
Mercury Vapor	21,000	172	\$38.85	\$39.07 /Lamp
Mercury Vapor	55,000	412	\$88.15	\$88.66 /Lamp
High Pressure Sodium	5,800	31	\$14.88	\$14.92 /Lamp
High Pressure Sodium	22,000	85	\$27.39	\$27.50 /Lamp
High Pressure Sodium	50,000	176	\$49.15	\$49.37 /Lamp
Schedule OL-42				
Basic Charge				
Single Phase			\$9.58	\$9.58 /month
Three Phase			\$13.12	\$13.12 /month
All kWh			18.119	18.070 ¢/kWh
Schedule LS-51				
	<i>lumen</i>	<i>Watts</i>	<i>kWh</i>	
HPSV - Functional				
High Pressure Sodium	5,800	70	31	\$10.92
High Pressure Sodium	9,500	100	44	\$13.11
High Pressure Sodium	16,000	150	64	\$18.01
High Pressure Sodium	22,000	200	85	\$23.05
High Pressure Sodium	27,500	250	115	\$30.33
High Pressure Sodium	50,000	400	176	\$45.39
Decorative Series 1				
High Pressure Sodium	9,500	100	44	\$34.91
High Pressure Sodium	16,000	150	64	\$37.38
Decorative Series 2				
High Pressure Sodium	9,500	100	44	\$28.80
High Pressure Sodium	16,000	150	64	\$31.23
LED - Functional				
Light Emitting Diode	4,000	50	17	\$10.27
Light Emitting Diode	6,200	75	25	\$14.08
Light Emitting Diode	13,000	135	47	\$26.61
Light Emitting Diode	16,800	185	64	\$39.22

PacifiCorp
State of California
ECAC/GHG Application
Statement of Present and Proposed Rates

Tariff Schedules				Present Rates	Proposed Rates
Schedule LS-53					
	<i>lumen</i>	<i>Watts</i>	<i>kWh</i>		
High Pressure Sodium	5,800	70	31	\$4.75	\$4.68 /Lamp
High Pressure Sodium	9,500	100	44	\$6.77	\$6.67 /Lamp
High Pressure Sodium	16,000	150	64	\$9.81	\$9.66 /Lamp
High Pressure Sodium	22,000	200	85	\$13.05	\$12.86 /Lamp
High Pressure Sodium	27,500	250	115	\$17.64	\$17.38 /Lamp
High Pressure Sodium	50,000	400	176	\$27.02	\$26.63 /Lamp
Non-Listed Luminaire				15.351	15.125 ¢/kWh
Schedule LS-58					
Class A	<i>lumen</i>		<i>kWh</i>		
Incandescent	2,500		73	\$13.36	\$13.27 /Lamp
Mercury Vapor	7,000		76	\$13.92	\$13.82 /Lamp
Mercury Vapor	21,000		172	\$31.50	\$31.29 /Lamp

APPENDIX C

Appendix C
PacifiCorp
Summary of Earnings
Twelve Months Ended December 31, 2020

Line	Item	California
1	Operating Revenue	\$99,502,572
2	Operating Expenses	<u>\$76,461,214</u>
3	Operating Revenue for Return	<u><u>\$23,041,358</u></u>
4	Total Rate Base	\$284,849,438
5	Return on Rate Base	8.09%

Application No. 21-08-_____
Exhibit No. PAC/100 - 106
Witness: Douglas R. Staples

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Direct Testimony of Douglas R. Staples

August 2, 2021

Table of Contents

I.	Witness Qualifications	1
II.	Summary of Testimony	2
III.	Transition to Aurora Model.....	5
IV.	Adjusted Actual Net Power Costs	7
V.	2022 Balancing Rate	8
VI.	2022 Offset Rate.....	12
VII.	2022 Projected Net Power Costs	14
VIII.	Fuel Stock Carrying Charge	16
IX.	ARB Administrative Costs.....	16
X.	Net Metering Surplus Costs	17
XI.	Renewable Energy Credits	17
XII.	Production Tax Credits.....	17
XIII.	Start-up Fuel Costs	18
XIV.	Energy Imbalance Market	18

Attached Exhibits

Exhibit PAC/101 – California ECAC Offset/Balancing Rate Calculation

Exhibit PAC/102 – Net Power Cost Analysis—Adjusted Actual 2020 Net Power Costs

Exhibit PAC/103 – Net Power Cost Analysis—Adjusted Actual/Projected 2021 Net Power Costs

Exhibit PAC/104 – Net Power Cost Analysis—Projected 2022 Net Power Costs

Exhibit PAC/105 – 2022 California-allocated Net Power Costs

Confidential Exhibit PAC/106 – ARB Administrative Costs

Direct Testimony of Douglas R. Staples

I. Witness Qualifications

Q. Please state your name, business address, and present position with PacifiCorp d/b/a Pacific Power (PacifiCorp or Company).

A. My name is Douglas R. Staples and my business address is 825 NE Multnomah Street, Suite 600, Portland, Oregon 97232. I am currently employed as a Net Power Cost Advisor in the Net Power Costs Group.

Q. Briefly describe your education and business experience.

A. I received a Bachelor of Science degree with a focus on finance from the University of South Florida. I originally began working for PacifiCorp in early 2015, and during my tenure at PacifiCorp, I have worked as a senior risk management analyst. After a brief departure from the Company, in 2019 I returned to work at PacifiCorp as a Net Power Cost Advisor. In my current role, I am responsible for leading and overseeing all modeling efforts associated with the Company's net power costs (NPC) for regulatory purposes and various other regulatory filings using Generation and Regulation Initiative Decision Tools (GRID) and the Aurora production cost model. Before my time with PacifiCorp, I spent seven years working as a senior risk analyst and a supervisor of the risk management group at NextEra Energy Power Marketing where I designed reports, provided validation and troubleshooting of risk metrics, and oversaw the validation of valuation assumptions used in mark to market accounting for financial statements. Prior to that, I worked as a principal business analyst for San Diego Gas & Electric where I was a part of the acting arm of the risk management committee, providing oversight to both San Diego Gas & Electric Company and Southern California Gas Company.

1 **Q. Have you testified in previous regulatory proceedings?**

2 A. Yes. I have previously provided testimony to the public utility commissions in
3 Oregon and Washington.

4 **II. Summary of Testimony**

5 **Q. Please summarize your direct testimony.**

6 A. I present the Company's proposed Energy Cost Adjustment Clause (ECAC)
7 Balancing Rate and Offset Rate calculations for calendar year 2022 (2022 ECAC). In
8 addition, my testimony:

- 9 • Includes a discussion on the Company's transition to the Aurora model for the
10 purpose of forecasting net power costs (NPC) in this filing;
- 11 • Presents the updated 2020 adjusted actual and 2021 adjusted actual/projected
12 net power costs, which are used to develop the 2022 Balancing Rate;
- 13 • Includes a discussion about the Company's participation in the energy
14 imbalance market (EIM) with the California Independent System Operator
15 (CAISO) and the benefits from EIM that are passed through to customers;
- 16 • Presents the 2022 projected NPC, which are used to develop the 2022 Offset
17 Rate;
- 18 • Describes the determination of NPC using the Company's production cost
19 model, Aurora; and
- 20 • Describes the treatment of fuel stock carrying charges, costs for
21 implementation and reporting verification under the California Air Resources
22 Board (ARB) Mandatory Reporting Rule and Cap and Trade Program (ARB
23 administrative costs), net metering surplus costs, purchases of renewable

energy certificates (RECs) for renewables portfolio standard (RPS) compliance, renewable energy production tax credits (PTCs), and start-up fuel costs.

Q. Please provide an overview of the ECAC filing.

A. In this 2022 ECAC filing, the Company is requesting recovery of approximately \$3.1 million through the Balancing Rate to true-up collection of actual NPC during 2020 and 2021. The change in the Balancing Rate results in a \$2.4 million decrease compared to rates currently in effect that were approved in Decision (D.) 20-12-004, the Company's 2020 ECAC and GHG Application, Application (A.) 19-08-002. The Company is also proposing to adjust the Offset Rate for 2022 resulting in a rate decrease of approximately \$3.0 million as compared to rates currently in effect that were approved in D.20-12-004. Compared to total-Company NPC proposed in the 2021 ECAC,¹ projected NPC in the 2022 ECAC are higher by 4.1 percent. As shown in Exhibit PAC/101, Line 14, the proposed 2022 Offset Rate is \$25.15 per megawatt-hour (MWh), which is an increase of 5.3 percent from the rate of \$23.88 per MWh, which the Company proposed in its 2021 ECAC and GHG Application, A.20-08-002 (2021 Application). With the change in the Offset Rate greater than the five percent threshold, the Company proposes to change the rate for 2022 and increase the 2022 Balancing Rate.

In addition to NPC, the Balancing Rate and Offset Rates include changes to ARB administrative costs, net metering surplus compensation, fuel stock carrying charges, REC purchases for RPS compliance, PTCs, and start-up fuel costs.

¹ A Commission decision regarding the Company's 2021 ECAC in A.21-08-002 is still pending.

1 Renewable energy PTCs and start-up fuel costs have been included in accordance
2 with the Commission's decision in the Company's 2019 Rate Case filing, A.18-04-
3 002 (2019 Rate Case), D.20-02-025.

4 Summary calculations of the Balancing Rate and Offset Rate are provided in
5 Exhibit PAC/101. If approved, the proposed rates would take effect January 1, 2022.
6 Ms. Judith M. Ridenour provides testimony describing the impact on customers' rates
7 (Exhibit PAC/600).

8 **Q. Please explain the status of the Company's 2021 Application.**

9 A. The 2021 Application filed by the Company is still pending approval from the
10 Commission. The GHG-related costs and allowance proceeds portion of the 2021
11 Application was approved by the Commission in D.21-03-007. With respect to the
12 ECAC portion of the 2021 Application, the case has been fully heard and briefed and
13 awaits a final decision. In preparing the 2022 ECAC Offset and Balancing Rates,
14 PacifiCorp has assumed that the Offset and Balancing Rates proposed in the 2021
15 Application will be approved by the Commission.² To the extent that those rates are
16 modified in any way by a final decision in the case, PacifiCorp will true up its 2022
17 Application to reflect such changes. This could be done by supplemental testimony,
18 or by an amendment to the 2022 ECAC application, and PacifiCorp will consider the
19 appropriate procedural means for an adjustment to reflect a final decision in the 2021
20 ECAC after it has been issued.

21 **Q. Please describe Exhibit PAC/101.**

² However, the present rates and rate impact calculation presented in Exhibit PAC/600 do not reflect the pending rates proposed in A.21-08-002, but rather rates that are currently in place.

1 A. Exhibit PAC/101 shows the calculation of the proposed Offset and Balancing Rates
2 for the 2022 rate effective period. Lines 1 through 14 are used to develop the Offset
3 Rate. Lines 15 through 61 are used to develop the Balancing Rate.

4 **III. Transition to Aurora Model**

5 **Q. Why is PacifiCorp estimating NPC with the Aurora model in this filing?**

6 A. PacifiCorp's former model, GRID, has been used to forecast costs since it was
7 deployed by the Company in 2008. Moving to the Aurora model, which is produced
8 by Energy Exemplar, provides some additional functionality, increases usability, and
9 compatibility with the Company's information technology and cyber security
10 requirements.

11 **Q. How does the Aurora model work?**

12 A. Aurora is designed to model the competitive wholesale electricity market and produce
13 hourly market prices to meet load requirements at various locations (referred to as
14 "zones"). This is accomplished by simulating the dispatch of available resources, both
15 supply-side and demand-side, within physical and economic constraints of the
16 resources, as well as profiles of the load requirements. These simulations determine
17 the resources at the margin in each hour to serve the next incremental amount of load
18 requirements of the zones and the costs of the resources at the margin, which set the
19 market prices of the zones.

20 **Q. How does Aurora compare to GRID?**

21 A. The model logic is generally the same between Aurora and GRID; both models
22 minimize costs to serve obligations under various constraints. While the categories of
23 inputs are generally the same between the two models, Aurora has more parameters to

1 model resources and more flexibility to model different types of resources.

2 **Q. Are there any other changes being made to the filing that can be attributed to**
3 **the transition from GRID to Aurora?**

4 A. Yes. In previous ECAC filings, because of the limitations in the GRID model, the
5 Company needed to engage in an iterative process to ensure the optimal marginal
6 costs used for the coal plant dispatch were reflective of the Company's coal supply
7 agreements (CSAs). In approving the Company's Offset and Balancing Rates in the
8 2020 Application (A.19-08-002) in D.20-12-004, the Commission found that "[s]ince
9 PacifiCorp must pay the full price of fuel for any purchases below minimum take
10 requirements, we agree that ratepayers are likely to benefit from ensuring all
11 minimum take requirements are met ..."³ While finding the Company's iterative
12 process appropriate, the Commission required more transparency and directed the
13 Company to produce the following information in its ECAC applications going
14 forward:

- 15 1. information on the marginal fuel cost assumed for each coal plant, the specific
16 coal plants where adjustments were made to align forecasted generation with
17 minimum take provisions, and the magnitude of adjustments made;
- 18 2. a GRID model run that depicts the NPC when adjustments are made to the
19 Dispatch Tier meet minimum take provisions;
- 20 3. a GRID model run that depicts the NPC when the Dispatch Tier is based
21 purely on marginal costs; and
- 22 4. a GRID model run that depicts the NPC when average fuel costs are utilized
23 to forecast unit dispatch.⁴

24 The Aurora model used by the Company in this proceeding has greater
25 flexibility around the modeling of fuel consumption. In addition, the Aurora model

³ D.20-12-004 at 16.

⁴ *Id.*, at 16-17. Pursuant to D.20-12-004, PacifiCorp provided this information in the 2021 ECAC as supplemental testimony on February 5, 2021.

1 neither has a “dispatch tier,” nor a “costing tier” like GRID; Aurora utilizes the same
2 data variables for dispatch and cost determination. Finally, the model can recognize
3 volumetric contract provisions as a binding constraint in the optimization.

4 As a result, the base NPC in this case is being forecasted using tiered costs
5 and volumes per each plant’s CSAs and, thus, the iterative process previously used in
6 GRID is no longer needed. Because the iterative process is no longer needed using
7 Aurora, there are no adjustments to identify or quantify. In addition, as the tiers are no
8 longer blended due to Aurora’s more robust modeling capabilities, the average cost
9 run is no longer required either. With the modeling enhancements captured by the
10 transition to Aurora, the previously ordered studies noted above are no longer
11 relevant or needed.

12 IV. Adjusted Actual Net Power Costs

13 **Q. Please explain adjusted actual NPC.**

14 A. NPC are defined as the sum of the Company’s fuel expenses, wholesale purchase
15 power expenses, and wheeling expenses, less wholesale sales revenue. Adjusted
16 actual NPC are the sum of total-Company amounts recorded in Federal Energy
17 Regulatory Commission Accounts 501, 503 and 547 (Steam Production Fuel
18 Expense) for the Company’s coal, geothermal, and natural gas resources; 555
19 (Purchased Power); and 565 (Wheeling); less Account 447 (Sales for Resale). These
20 amounts are adjusted to: (1) align booked NPC in those accounts with NPC used in
21 the rate setting process, ensuring only comparable costs are used in the deferral
22 calculation; and (2) remove prior-period accounting entries, if any, recorded during
23 the deferral period that are not applicable to the current period.

1 **Q. Why are the 2020 adjusted actual NPC different from what the Company**
2 **included in its 2021 ECAC filing?**

3 A. At the time of the 2021 ECAC filing, actual NPC were only available for January
4 through May 2020. As a result, the data used to calculate the 2021 Balancing Rate
5 included five months of adjusted actual NPC (January through May 2020) and
6 seven months of projected NPC (June through December 2020). In the current filing,
7 the Company updated its 2020 data to incorporate the actual NPC for the entire
8 12--month period. The 2020 adjusted actual NPC are shown in Exhibit PAC/102.

9 **Q. Which months in 2021 reflect adjusted actual NPC in the current filing?**

A. January through May 2021 reflect adjusted actual NPC while June through December 2021 are a projection of the Company's NPC for the balance of the year. Consistent with the design of the ECAC, these are combined to reflect the overall expected NPC for 2021. The 2021 adjusted actual/projected NPC are shown in Exhibit PAC/103.

15 Q. How will the projected NPC be reconciled to actual NPC?

A. In its annual ECAC filings, the Company compares adjusted actual NPC to amounts previously projected. The difference between adjusted actual NPC and the projected amount on a California-allocated basis is tracked in the ECAC balancing account where it accrues interest based on the nonfinancial commercial paper rate. Amounts included in the ECAC balancing account are recovered from or refunded to customers through the Balancing Rate.

22 V. 2022 Balancing Rate

23 **Q. Please describe the components included in the 2022 Balancing Rate.**

- 1 A. The Balancing Rate is the rate that returns to or recovers from customers the actual
2 deferred NPC accumulated in the ECAC balancing account. Table 1 shows the
3 individual components making up the Balancing Rate for 2022.

Table 1

ECAC Balancing Rate			
Balancing Account			
1	Balancing Account Balance 12/31/2020	\$	2,708,020
2	2020 NPC Variance		114,316
3	2021 NPC Variance		(651,117)
4	Fuel Stock Carrying Charge, ARB Admin Costs, Net Metering Costs, REC Purchases, PTCs, and Start-Up Fuel Costs		932,995
5	Interest		2,680
		Sum of Lines	
6	Total Balancing Account	1 - 5	\$ 3,106,894
7	California Projected Sales (MWh)		747,460
8	Balancing Rate \$/MWh	Line 6 / Line 7	\$ 4.16
9	Billing Factor (Franchise Fees & Uncollectible Accounts)		102.1%
10	Balancing Rate with Billing Factor \$/MWh	Line 8 x Line 9	\$ 4.25

4 As shown in Table 1, the 2022 Balancing Rate is calculated by:

- 5 (1) Determining the total amount in the ECAC balancing account (Table 1, Line
6 6) by accumulating the sum of:
- 7 • the unrecovered amount from previous ECAC filings remaining in the
 - 8 ECAC balancing account as of December 31, 2020;
 - 9 • the variance between 2020 adjusted actual NPC and the amount
 - 10 projected in the 2021 ECAC filing;

- the variance between 2021 adjusted actual/projected NPC and the NPC projected in the 2021 ECAC filing;
- the fuel stock carrying charge, the ARB administrative costs, net metering surplus compensation, REC purchases for RPS compliance, PTCs, and Start-Up Fuel costs; and,
- interest accumulated on the balance of the ECAC balancing account.

(2) Dividing the total balance of the ECAC balancing account (Table 1, Line 6) by the California projected retail sales (Table 1, Line 7) included in the Company's 2019 Rate Case.

(3) Grossing-up the result for the ECAC Billing Factor (Table 1, Line 9) to account for franchise fees and uncollectible accounts expense, as included in the Company's 2019 Rate Case.

Q. What is the Company's proposed Balancing Rate?

A. As shown in Table 1 and in Exhibit PAC/101, Line 60, the proposed Balancing Rate is \$4.25 per MWh.

Q. What is the total dollar amount to be collected through the Balancing Rate in 2022?

A. Accumulating the 2020 residual balance and the incremental deferrals for 2020 and 2021, plus interest, results in a total of approximately \$3.1 million to be collected from customers through the Balancing Rate. The total includes amounts for the fuel stock carrying charges, net metering surplus compensation, ARB administrative costs, REC purchases for RPS compliance, PTCs, and start-up fuel costs.

Q. Please explain the difference between the amount of NPC that was anticipated to

1 **be deferred during 2020 and the actual NPC deferred during 2020.**

2 A. In its 2021 ECAC filing, the 2020 deferral was calculated using actual information
3 from January through May 2020 and a projection of NPC and related collections from
4 customers for the remainder of the year. The Company anticipated that during 2020
5 it would accumulate an over-recovery of approximately \$1.1 million from customers.
6 The actual amount deferred for 2020 was an over-recovery of \$1.0 million, or a
7 difference of \$114,000 from projected levels, as shown on Line 49 of Exhibit
8 PAC/101.

9 The \$1.0 million over-recovery consists of two components: (1) actual NPC
10 for 2020 was approximately \$251,000 higher than projected on a California-allocated
11 basis; and (2) collections from customers through the Offset Rate in effect during
12 2020 were approximately \$1.2 million higher than projected, causing the deferred
13 balance to increase. Adjusted Actual NPC were higher than anticipated NPC, in part
14 due to lower wholesale sales revenue, but partially offset by lower coal costs, natural
15 gas costs, and purchase power expense.

16 **Q. Please describe the changes that caused an increase in NPC during 2020.**

17 A. Overall, the variance between total Company Actual NPC and the Offset Rate for
18 2020 was \$9.8 million or 0.7 percent. While wholesale sales revenue was \$151
19 million lower than projected in the 2020 ECAC, that was mostly offset by lower coal
20 costs of \$76 million, lower gas costs of \$38 million, and purchased power expense
21 \$30 million.

22 **Q. Please describe why collections from customers through the Offset Rate were**
23 **higher than expected during 2020.**

1 A. Collections through the Offset Rate are based on customer usage. The Offset Rate for
2 2020 was determined using the California retail sales included in the Company's
3 2019 Rate Case. In 2020, customer usage was approximately 11,000 MWh higher
4 than the MWh assumption in the 2019 Rate Case.

5 **Q. Please explain the amount the Company expects to defer to the ECAC balancing**
6 **account during 2021.**

7 A. Based on actual NPC data for five months (January through May 2021) and projected
8 NPC for seven months (June through December 2021), the Company anticipates it
9 will defer an approximate reduction of \$651,000 to the ECAC balancing account
10 during 2021. The residual balance of approximately \$2.7 million in the balancing
11 account at the end of 2020 is added to the expected 2021 deferral and the net result is
12 approximately \$2.1 million to be collected from customers as shown on line 49 of
13 Exhibit PAC/101.

14 **VI. 2022 Offset Rate**

15 **Q. Please explain the 2022 Offset Rate.**

16 A. The Offset Rate is the amount of California-allocated 2022 NPC, fuel stock carrying
17 charges, ARB administrative costs, net metering surplus compensation, REC
18 purchases for RPS compliance, PTCs, and start-up fuel costs that will be recovered
19 from customers for the forecast test year (2022). According to the Commission-
20 approved terms of the ECAC mechanism, if the change in the Offset rate exceeds a
21 threshold of five percent, the rate is updated for the upcoming rate effective period.
22 Compared to NPC in the 2021 ECAC, forecast NPC in the 2022 ECAC are higher by
23 4.1 percent. Additionally, the inclusion of PTCs in the 2022 ECAC decreases net

1 power cost even further and thereby decreases the Offset Rate. The proposed Offset
2 Rate is \$25.15 per MWh, which is an increase of 5.3 percent from the rate of \$23.88
3 per MWh, as proposed in the Company's 2021 Application. With the change in the
4 Offset Rate greater than the five percent threshold, the Company proposes to change
5 the Offset Rate for 2022.

6 **Q. Please explain the calculation of the Offset Rate for 2022.**

7 A. The Offset Rate is calculated by:

- 8 (1) summing the projected California-allocated 2022 NPC, fuel stock carrying
9 charges, ARB administrative costs, net metering surplus compensation, REC
10 purchases for RPS compliance, PTCs, and start-up fuel costs;
- 11 (2) dividing by the projected California retail sales; and
- 12 (3) grossing up the amount by the ECAC Billing Factor to account for franchise
13 fees and uncollectible accounts expense.

14 As shown in Exhibit PAC/101, Line 14, the calculated 2022 Offset Rate is \$25.15 per
15 MWh. The rate is composed of approximately \$22.3 million in California-allocated
16 NPC, \$0.01 million of fuel stock carrying charges, \$0.05 million in ARB
17 administrative costs, \$0.2 million of REC purchases for RPS compliance, a credit of
18 \$4.2 million for PTCs, and \$0.06 million of start-up fuel costs. Net metering surplus
19 compensation is currently not a material charge, so the Company has not included a
20 projection for these costs in 2022. In the future, these costs may increase and the
21 Company may include a forecast as part of future Offset Rate calculations. All
22 components of the 2022 Offset Rate are calculated based on the 2019 Rate Case.

VII. 2022 Projected Net Power Costs

Q. How does the Company calculate its projected NPC?

A. NPC are calculated for a future period based on projected data using Aurora, which is a production cost model that simulates the operation of the Company's power system on an hourly basis.

Q. Is the Company's general approach to the calculation of NPC using the Aurora model the same in this case as in previous ECAC filings?

A. The general approach remains the same. However, as noted previously in my testimony, the model has been modified in this case, with Aurora replacing the previously used GRID model.

Q. What Aurora inputs were updated for this filing?

A. Aurora model inputs were updated to include:

- The Company's March 31, 2021 official forward price curve for electricity and natural gas prices;
- New wholesale electricity sales and purchase transactions, both physical and financial;
- New natural gas purchase and sales transactions, both physical and financial;
- New wheeling contracts and updates to transmission paths and capacity, including on Company-owned transmission;
- Updates to existing contracts for wholesale sales and purchases of electricity and natural gas and for wheeling;
- New and updated coal supply and transportation contracts and costs at the Company's captive mines;

- Updates to the capabilities of the Company's owned generation resources and the cost to integrate wind generation and load on the Company's system; and
- Updates to forecast loads.

Q. What reports does the Aurora model produce?

A. The major output from the Aurora model is the NPC report. The 2022 report is attached as Exhibit PAC/104.

Q. Does the Aurora model appropriately reflect the Company's projected NPC over the 2022 test period?

A. Yes. The Aurora model is a reasonable simulation of the operation of the Company's system load and resource portfolio, consistent with the Company's system operation constraints and requirements. Any variances from projected NPC are handled through the ECAC balancing account, where projected NPC are trued up to adjusted actual NPC on a monthly basis.

Q. What are the projected NPC for 2022?

A. The Company's projected NPC for calendar year 2022 are \$1.461 billion, or approximately \$22.3 million on a California-allocated basis. The Company's 2022 NPC study is provided as Exhibit PAC/104, and the allocation of the Company's NPC to California is provided as Exhibit PAC/105.

Q. Does the 2022 NPC include any new purchase contracts that exceed more than one percent of the load associated with purchased power?

A. Yes. The Company has included one new purchase contract that was not included in the 2021 ECAC. This contract accounts for \$6.3 million of purchased power expense in 2021 on a total-Company basis which accounts for more than one percent of total

1 purchased power load and has been provided as a separate workpaper.⁵

2 **VIII. Fuel Stock Carrying Charge**

3 **Q. Does the 2022 Offset Rate include the forecast carrying charges on fuel stock**
4 **balances?**

5 A. Yes. The 2022 Offset Rate includes a forecast carrying charge of \$14,874.

6 **Q. Does the 2022 Balancing Rate also include a true up of actual fuel stock carrying**
7 **charges?**

8 A. Yes. The 2022 Balancing Rate includes a credit of \$10,266 (including interest) to
9 true up fuel stock carrying charges to actual costs in 2020 and 2021. Actual carrying
10 charges for 2020 and 2021 were higher than projected due to differences in fuel stock
11 balances and interest rates used to determine the carrying charges previously.

12 **IX. ARB Administrative Costs**

13 **Q. Does the 2022 Offset Rate include ARB administrative costs?**

14 A. Yes. The 2022 Offset Rate includes \$46,189 of ARB administrative costs.

15 **Q. Does the 2022 Balancing Rate include ARB administrative costs that were**
16 **booked to the memorandum account authorized in the Company's 2012 ECAC?**

17 A. Yes. The proposed Balancing Rate includes a surcharge of \$18,230 (including
18 interest) to account for the difference between actual and forecast ARB administrative
19 costs. Confidential Exhibit PAC/106 provides a summary of the costs booked in
20 2020 and 2021, as well as a projection of 2022 costs.

⁵ The ECAC settlement approved in PacifiCorp's 2005 general rate case (A.05-11-022) stipulates that the Company will provide copies of all new purchase contracts that account for more than one percent of total purchased power load.

X. Net Metering Surplus Costs

Q. Does the 2022 Offset Rate include the forecast net metering surplus costs?

A. No. Net metering surplus compensation is currently an immaterial charge, so the Company has not included a projection for this cost in 2022.

Q. Does the 2022 Balancing Rate also include a true up of actual net metering surplus costs?

A. Yes. The 2022 Balancing Rate includes \$8,328 (including interest) to true up net metering surplus costs to actual costs in 2020 and 2021.

XI. Renewable Energy Credits

Q. Does the Company's 2022 ECAC filing include any revenue from the sale of RECs?

A. No. The Company has not sold any of its California-allocated RECs; rather, these RECs have been retained for compliance with California's RPS.

Q. Does the 2022 Offset Rate include the forecast of any costs from the purchase of RECs?

A. Yes. The 2022 Offset Rate includes a forecast of \$192,219.

Q. Does the 2022 Balancing Rate include a true up of actual REC purchases for RPS Compliance?

A. Yes. The 2022 Balancing Rate includes \$237,353 (including interest) to true up REC purchases to actual purchases for RPS Compliance in 2020 and 2021.

XII. Production Tax Credits

Q. Does the 2022 Offset Rate include the forecast of renewable energy PTCs?

1 A. Yes. The 2022 Offset Rate includes a credit of \$4,151,872 based on the forecasted
2 wind generation attributed to PTCs.

3 **Q. Does the 2022 Balancing Rate include a true up of actual PTCs?**

4 A. Yes. The 2022 Offset Rate includes a surcharge of \$674,753 (including interest) to
5 true up forecasted PTCs to actual PTCs in 2020 and 2021.

6 **XIII. Start-up Fuel Costs**

7 **Q. Does the 2022 Offset Rate include the forecast of any start-up fuel costs?**

8 A. Yes. The 2022 Offset Rate includes a forecast of \$58,712 for start-up fuel costs.

9 **Q. Does the 2022 Balancing Rate include a true up of actual start-up fuel costs?**

10 A. Yes. The 2022 Offset Rate includes a surcharge of \$5,978 (including interest) to true
11 up start-up fuel costs to actual costs in 2020 and 2021.

12 **XIV. Energy Imbalance Market**

13 **Q. Are the actual benefits from participating in the EIM with CAISO included in the**
14 **ECAC deferral?**

15 A. Yes. Participation in the EIM provides benefits to customers in the form of reduced
16 Actual NPC. The EIM benefits are embedded in Actual NPC through lower fuel and
17 purchased power costs. The Company is able to calculate the margin realized on its
18 EIM imports and exports, or the total inter-regional benefit. The Company's EIM
19 inter-regional benefit for the deferral period was approximately \$46.7 million.

20 **Q. How does the Company calculate its actual EIM benefits?**

21 A. Using actual information from the EIM, including five- and 15-minute pricing, the
22 Company identifies the incremental resource that could have facilitated the transfer to
23 an adjacent EIM area or the CAISO in each five-minute interval. The benefit is then

1 calculated as the difference between the revenue received less the expense of
2 generation assumed to supply the transfer. In the event of an import, the benefit is
3 equal to the cost of the import minus the avoided expense of the generation that
4 would have otherwise been dispatched.

5 **Q. Does this conclude your direct testimony?**

6 A. Yes.

Application No. 21-08-_____
Exhibit No. PAC/101
Witness: Douglas R. Staples

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

California ECAC Offset/Balancing Rate Calculation

August 2, 2021

Exhibit PAC/101
California ECAC Offset / Balancing Rate Calculation
August 2, 2021

Line		2020 Projected	2021 Projected	2022 Projected
	ECAC Implementation			
	ECAC Offset Rate			
1	Total Company Projected ECAC NPC	\$ 1,503,542,250	\$ 1,403,343,385	\$ 1,460,956,065
2	California Allocated Projected NPC	22,829,800	21,394,283	22,259,157
3	California Allocated Carrying Charge of Fuel Stock	31,340	13,255	14,874
4	California ARB Administrative Costs	47,845	82,419	46,189
5	California Net Metering Surplus Costs	-	-	-
6	California Allocated Renewable Energy Credits Purchases	112,189	75,487	192,219
7	California Allocated Production Tax Credits	(1,691,766)	(4,138,141)	(4,151,872)
8	California Allocated Start-Up Fuel Costs	65,673	61,701	58,712
9	California Projected Sales in MWh	747,460	747,460	747,460
10	Projected ECAC Offset Rate \$/MWh	\$ 28.62	\$ 23.40	\$ 24.64
11	Offset Rate Percentage Change	-3.5%	-18.2%	5.3%
12	ECAC Offset Rate \$/MWh	\$ 28.62	\$ 23.40	\$ 24.64
13	Billing Factor (Franchise Fees & Uncollectible Accounts)	102.1%	102.1%	102.1%
14	ECAC Offset Rate with Billing Factor \$/MWh	\$ 29.21	\$ 23.88	\$ 25.15

	2020 Actual	2021 Actual/Projected
	ECAC Balancing Rate	
15	Total Company Projected NPC	\$ 1,503,542,250 \$ 1,403,343,385
16	Total Company Adjusted Actual NPC	1,513,316,797 1,503,529,458
17	Variance (Line 16 - Line 15)	\$ 9,774,547 \$ 100,186,073
	Total Company Component Variance	
	Wholesale Sales Revenue	
18	Firm	\$ (151,196,311) \$ 169,982,775
19	Non-Firm	- 0
	Purchase Power Expense	
20	Seasonal	- -
21	Existing Demand	(9,029,875) 2,232,970
22	Existing Energy	(12,700,562) 7,010,970
23	QF	9,481,084 236,078
24	Firm	(25,591,200) 194,923,284
25	Non-Firm	11,700 (0)
	Wheeling	
26	Firm	(3,064,705) 10,884,835
27	Non-Firm	11,979,670 4,024,832
	Generation	
28	Coal	(81,015,519) 28,276,935
29	Seasonal Gas	(839,939) 3,049,705
30	Gas	(36,795,455) 17,957,360
31	Other	1,449,148 1,521,826
	Other	
32	Cholla/APS	4,693,888 50,052
Total	\$ 9,774,547	\$ 100,186,073

California Allocated Component Variance				
Wholesale Sales Revenue				
33	Firm	\$	(2,426,408)	\$ 2,686,466
34	Non-Firm		-	0
Purchase Power Expense				
35	Seasonal		-	
36	Existing Demand		(146,499)	35,291
37	Existing Energy		(190,900)	104,483
38	QF		156,848	3,731
39	Firm		(428,491)	3,080,635
40	Non-Firm		174	(0)
Wheeling				
41	Firm		(48,506)	172,028
42	Non-Firm		179,659	59,981
Generation				
43	Coal		(1,236,324)	421,404
44	Seasonal Gas		(539,559)	267,614
45	Gas		(12,485)	45,449
46	Other		21,473	22,679
Other				
47	Cholla/APS		68,760	746
48	Total - California Energy Cost Account	\$	250,559	\$ 1,527,575
49	Under (Over) Collection of California NPC	\$	114,316	\$ 2,056,904
50	California Energy Cost Adjustment Account Interest		239	1,059
51	California Deferred Fuel Stock Carrying Charges		(6,645)	(3,620)
52	California ARB Administrative Costs		6,946	11,284
53	California Net Metering Surplus Compensation		3,438	4,890
54	California Renewable Energy Credits Purchases		155,514	81,839
55	California Production Tax Credits		317,278	357,476
56	California Start-Up Fuel Costs		1,058	4,920
57	Total California Balancing Account	\$	592,143	\$ 2,514,751

		2020		2021		2022
58	ECAC Balancing Rate \$/MWh	\$	7.35	\$	1.03	\$ 4.16
59	Billing Factor (Franchise Fees & Uncollectible Accounts)		102.1%		102.1%	102.1%
60	Balancing Rate w Billing Factor \$/MWh	\$	7.50	\$	1.05	\$ 4.25
61	Balancing Rate Percentage Change					304.3%

Application No. 21-08-_____
Exhibit No. PAC/102
Witness: Douglas R. Staples

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Net Power Cost Analysis—Adjusted Actual 2020 Net Power Costs

August 2, 2021

August 2, 2021
California ECAC 2020 Adjusted Actual Net Power Cost

Exhibit PAC/102

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total 2020
Special Sales For Resale													
Long Term Firm Sales													
Black Hills	\$ 123,873	\$ 122,300	\$ 154,273	\$ 245,084	\$ 237,693	\$ 348,302	\$ 364,757	\$ 297,534	\$ 455,758	\$ 332,763	\$ 283,072	\$ 202,932	\$ 3,168,341
Hurricane Sale	-	-	-	-	-	-	-	-	-	124	838	987	1,948
Leaning Juniper Revenue	10,124	6,857	6,304	(14,714)	3,427	3,726	7,994	12,426	9,695	11,652	6,961	5,008	69,459
Total Long Term Firm Sales	\$ 133,997	\$ 129,157	\$ 160,577	\$ 230,370	\$ 241,120	\$ 352,028	\$ 372,751	\$ 309,959	\$ 465,453	\$ 344,539	\$ 290,870	\$ 208,927	\$ 3,239,748
Total Short Term Firm Sales	\$ 12,152,913	\$ 9,452,766	\$ 11,271,087	\$ 9,043,570	\$ 6,877,358	\$ 9,086,458	\$ 9,140,625	\$ 26,612,932	\$ 16,436,504	\$ 23,182,097	\$ 23,268,422	\$ 14,042,233	\$ 170,566,963
Total Secondary Sales	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Special Sales For Resale	\$ 12,286,909	\$ 9,581,923	\$ 11,431,664	\$ 9,273,940	\$ 7,118,478	\$ 9,438,485	\$ 9,513,376	\$ 26,922,891	\$ 16,901,957	\$ 23,526,636	\$ 23,559,292	\$ 14,251,160	\$ 173,806,710
Purchased Power & Net Interchange													
Long Term Firm Purchases													
APS Supplemental	\$ 7,656	\$ 129,026	\$ 46,209	\$ 38,115	\$ 15,105	\$ 22,319	\$ 8,082	\$ 17,864	\$ 36,978	\$ 60,290	\$ -	\$ -	\$ 381,642
Cedar Springs Wind	-	-	-	-	-	-	-	-	144,348	103,096	366,878	1,371,128	1,985,451
Cedar Springs III Wind	-	-	-	-	-	-	-	-	-	-	-	790,204	790,204
Combine Hills Wind	771,404	627,425	494,573	530,895	438,918	555,358	480,064	392,401	287,257	491,198	487,971	375,685	5,933,148
Cove Mountain Solar	-	-	-	-	-	16,805	28,821	28,406	287,834	237,809	214,873	170,421	984,970
Cove Mountain Solar 2 - FaceBook	-	-	-	-	-	-	864,426	97,116	448,844	1,140,195	477,376	353,716	3,381,672
Deseret Purchase	1,349,498	4,110,112	2,735,686	2,243,870	2,337,323	2,419,443	2,737,210	2,818,497	2,594,351	2,585,446	2,892,998	3,110,120	31,934,552
Eagle Mountain - UAMPS/UMPA	200,110	188,937	164,535	146,988	173,905	348,612	509,979	486,884	273,464	174,394	171,795	254,986	3,094,589
Gemstate	249,614	143,152	143,152	143,152	143,152	143,152	143,152	143,152	143,152	150,059	150,059	150,059	1,845,007
Hunter Solar	-	-	-	-	-	-	-	-	-	-	-	-	-
Hurricane Purchase	17,892	18,207	15,120	12,537	10,395	12,285	15,498	45,386	21,924	15,183	12,587	13,963	210,977
MagCorp Reserves	456,648	415,376	424,897	403,523	394,001	359,303	347,916	338,609	326,594	341,818	337,345	345,617	4,491,647
Milford Solar - FaceBook Oregon	-	-	-	-	-	-	-	-	507,977	624,943	313,725	341,828	1,788,472
Millican Solar	-	-	-	-	-	-	-	-	-	-	-	-	-
Monsanto Reserves	1,666,980	2,195,172	1,207,387	1,666,980	1,666,980	1,666,980	1,666,980	1,666,980	1,666,980	1,666,980	1,666,980	1,666,980	20,072,359
Nucor	600,100	600,100	600,100	600,100	600,100	600,100	600,100	600,100	600,100	600,100	600,100	600,100	7,201,200
Old Mill Solar	7,278	12,945	20,306	21,899	12,977	11,484	28,399	35,061	38,760	27,684	12,240	12,116	241,148
Pavant III Solar	42,263	50,238	85,376	78,428	75,355	138,828	248,363	993,042	292,438	133,354	70,137	45,304	2,253,125
PGE Cove	14,577	14,577	14,577	44,554	14,577	14,577	14,577	14,577	14,577	14,577	14,577	14,577	204,897
Prineville Solar	-	-	-	-	-	-	-	-	-	-	-	-	-
Rock River Wind	735,911	597,620	468,819	427,061	296,343	346,605	258,159	203,565	351,056	522,138	601,432	554,968	5,363,677
Sigurd Solar	-	-	-	-	-	-	-	-	-	-	-	-	-
Small Purchases east	1,797	2,296	715	1,293	1,174	930	1,870	2,190	2,142	2,001	2,117	2,132	20,658
Small Purchases west	-	-	-	-	-	-	-	-	-	-	-	-	-
Amor IX - Univ of Utah	281,289	203,062	286,212	186,450	142,351	180,280	294,055	755,241	481,890	403,017	329,033	330,462	3,873,341
Three Buttes Wind	2,995,667	2,429,761	1,890,170	1,395,577	1,248,905	1,518,548	1,233,047	989,224	1,187,815	1,575,008	2,672,679	2,700,072	21,836,473
Top of the World Wind	5,608,891	4,420,801	3,604,516	2,780,215	2,691,973	2,960,118	2,475,755	2,056,011	2,605,313	2,846,002	5,265,331	5,382,184	42,697,110
Tri-State Purchase	797,495	844,338	934,368	854,690	784,038	-	-	-	-	-	-	-	4,214,929
Wolverine Creek Wind	1,434,316	947,091	1,103,341	841,732	1,036,903	991,355	665,313	769,186	684,879	1,129,885	1,069,174	692,897	11,366,071
Long Term Firm Purchases Total	\$ 17,239,385	\$ 17,950,234	\$ 14,240,058	\$ 12,418,058	\$ 12,084,474	\$ 12,307,082	\$ 12,621,765	\$ 12,453,492	\$ 12,998,672	\$ 14,845,176	\$ 17,729,406	\$ 19,279,517	\$ 176,167,319

August 2, 2021
California ECAC 2020 Adjusted Actual Net Power Cost

Exhibit PAC/102

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total 2020
Qualifying Facilities													
QF California	\$ 183,858	\$ 163,379	\$ 180,603	\$ 398,425	\$ 325,134	\$ 202,308	\$ 133,036	\$ 131,280	\$ 127,668	\$ 125,472	\$ 84,754	\$ 106,712	\$ 2,162,629
QF Idaho	573,105	403,340	559,395	618,321	848,719	755,160	725,947	560,388	522,703	586,119	549,415	593,438	7,296,050
QF Oregon	2,421,973	3,135,836	3,403,529	4,462,036	4,439,663	4,512,303	4,826,585	4,073,519	3,839,312	3,185,370	2,302,890	2,377,818	42,980,834
QF Utah	681,063	761,694	790,027	912,520	947,528	856,531	831,987	824,366	794,831	778,275	608,417	636,408	9,423,646
QF Washington	-	-	50	18,464	34,592	48,624	62,358	61,264	35,952	7,730	2,997	-	272,031
QF Wyoming	6,771	4,728	8,967	1,011	466	1,090	779	14,243	10,950	3,408	915	970	54,297
Biomass One QF	1,620,090	1,407,071	1,596,324	986,526	1,015,188	993,155	1,460,709	1,624,744	1,524,593	1,574,248	1,556,422	830,625	16,189,695
Chopin Wind QF	278,752	222,808	173,957	180,669	154,061	166,831	143,243	96,748	102,457	187,633	198,071	141,448	2,046,678
DCFP QF	302	302	515	317	701	832	2,908	9,262	5,580	3,451	1,764	924	26,858
Enterprise Solar I QF	672,676	891,830	839,668	1,102,836	1,311,732	1,401,260	1,728,797	1,594,388	1,165,099	879,597	688,025	583,596	12,859,503
Escalante 1 Solar QF	559,910	780,047	792,894	1,008,612	268,234	1,203,388	1,538,588	1,470,768	1,110,893	925,606	624,630	421,124	10,704,693
Escalante 2 Solar QF	533,861	752,922	752,723	967,372	1,103,019	1,162,433	1,491,287	1,422,941	1,059,727	883,595	590,590	425,128	11,145,597
Escalante 3 Solar QF	507,843	714,588	726,861	926,324	1,033,660	1,112,662	1,420,055	1,352,658	975,327	787,684	533,723	437,942	10,529,326
ExxonMobil QF	-	-	5	-	-	1	-	-	-	-	-	669	675
Five Pine Wind QF	1,075,796	683,657	827,739	1,370,777	682,342	1,395,392	583,331	664,458	643,164	977,108	953,967	581,694	10,439,425
Footee Creek III Wind QF	-	-	-	-	-	-	-	-	-	-	-	-	-
Granite Mountain East Solar QF	608,384	784,013	731,967	994,105	1,164,256	1,264,608	1,423,209	1,311,440	1,049,492	842,500	554,692	473,766	11,202,434
Granite Mountain West Solar QF	363,735	507,469	478,923	556,194	782,327	839,513	941,694	858,289	682,412	526,800	326,305	309,382	7,173,042
Iron Springs QF	629,288	826,786	777,647	1,034,115	1,192,618	1,300,089	1,523,651	1,473,637	1,082,796	875,466	585,640	514,096	11,815,831
Latigo Wind QF	1,143,809	989,580	1,014,021	772,840	587,251	901,314	691,616	718,940	585,703	721,302	866,937	936,519	9,929,833
Mountain Wind 1 QF	1,389,897	1,230,581	628,456	687,704	497,787	554,259	625,186	512,693	680,916	1,165,204	757,640	869,829	9,600,152
Mountain Wind 2 QF	2,235,075	1,813,668	1,010,863	941,628	682,380	900,228	1,060,601	763,464	947,542	1,540,117	1,085,069	1,239,793	14,220,429
North Point Wind QF	2,286,409	1,397,260	1,869,436	594,282	1,431,430	647,249	1,400,954	1,660,716	1,509,737	2,095,443	1,980,997	1,319,975	18,193,886
Oregon Wind Farm QF	1,238,458	1,448,974	1,128,171	1,223,967	890,758	1,482,192	1,586,909	1,087,508	744,750	90,374	852,389	598,316	12,372,766
Pavant II Solar QF	173,788	250,424	301,537	394,659	392,691	403,668	508,449	496,047	373,864	318,263	186,588	123,365	3,923,343
Pioneer Wind 1 QF	1,676,167	1,188,710	1,121,337	832,424	734,811	789,306	658,848	583,060	576,169	883,248	1,421,001	1,287,340	11,752,419
Power County North Wind QF	595,491	527,010	479,809	409,540	366,929	364,890	376,636	460,498	346,650	671,824	494,964	485,186	5,579,429
Power County South Wind QF	571,703	492,917	444,824	380,060	332,417	317,510	307,452	368,671	320,290	673,979	446,042	411,310	5,067,175
Roseburg Dillard QF	18,636	53,193	(20,062)	23,995	74,334	(30,511)	169,846	147,331	37,608	46,940	31,954	56,701	609,964
Sage I Solar QF	94,700	161,183	193,397	190,000	222,522	228,252	372,488	334,141	242,254	171,072	111,954	92,244	2,414,208
Sage II Solar QF	104,932	170,168	195,364	153,243	224,048	229,413	335,365	248,000	172,038	112,922	92,887	2,403,159	2,403,159
Sage III Solar QF	97,388	162,331	164,634	154,747	178,124	210,790	328,533	297,002	205,488	151,208	102,454	82,233	2,134,932
Spanish Fork Wind 2 QF	282,276	192,165	114,723	137,896	142,838	166,448	328,144	327,553	280,033	257,974	256,790	289,048	2,775,890
Sunnyside QF	-	-	1,623,689	2,687,285	2,432,422	2,663,084	2,438,990	2,964,431	2,464,101	2,490,145	2,513,483	2,380,076	24,657,707
Sweetwater Solar QF	341,212	575,966	623,390	795,188	828,649	825,478	959,963	851,217	660,682	510,157	355,031	290,202	7,617,135
Tesoro QF	4,754	58,557	39,577	12,302	2,078	2,600	-	1,340	1,809	6,488	9,325	64,119	202,948
Threemile Canyon Wind QF	140,538	203,650	187,948	180,312	242,039	236,202	179,296	96,895	94,767	183,524	118,630	86,110	2,049,012
Three Peaks Solar QF	488,073	676,114	667,494	914,738	1,017,161	947,561	1,192,847	1,156,922	944,767	838,984	529,424	423,476	9,797,561
Utah Pavant Solar QF	213,073	281,796	351,739	458,277	536,411	577,874	704,952	727,891	585,205	443,325	264,573	153,176	5,297,932
Utah Red Hills Solar QF	555,155	790,387	802,756	1,050,186	1,306,651	1,295,915	1,686,833	1,655,233	1,503,406	928,539	657,078	493,273	12,725,414
Qualifying Facilities Total	\$ 24,368,940	\$ 24,705,103	\$ 25,584,540	\$ 28,547,454	\$ 28,377,220	\$ 30,924,761	\$ 34,838,390	\$ 33,173,711	\$ 28,088,825	\$ 27,510,211	\$ 23,318,462	\$ 20,210,921	\$ 329,648,537
Mid-Columbia Contracts													
Grant Reasonable	(247,879)	(247,879)	(511,021)	(247,879)	(247,879)	(247,879)	(247,879)	(247,879)	(247,879)	(247,879)	(247,879)	(247,879)	(3,237,686)
Grant Surplus	173,914	173,914	59,445	173,914	173,914	173,914	173,914	173,914	173,914	173,914	173,914	173,914	1,972,501
Mid-Columbia Contracts Total	\$ (73,964)	\$ (73,964)	\$ (451,576)	\$ (73,965)	\$ (73,965)	\$ (73,965)	\$ (73,965)	\$ (73,965)	\$ (73,965)	\$ (73,965)	\$ (73,965)	\$ (73,965)	\$ (1,265,185)
Total Long Term Firm Purchases	\$ 41,534,360	\$ 42,581,372	\$ 39,373,022	\$ 40,891,547	\$ 40,387,729	\$ 43,157,879	\$ 47,386,191	\$ 45,553,238	\$ 41,013,532	\$ 42,281,422	\$ 40,973,903	\$ 39,416,474	\$ 504,550,670
Storage & Exchange													
APS Exchange	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cowlitz Swift	-	-	-	-	-	-	-	-	-	-	-	-	-
PSCo Exchange	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	5,400,000
SCL State Line	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Storage & Exchange	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 5,400,000
Total Short Term Firm Purchases	\$ (143,940)	\$ 9,510,475	\$ 13,707,213	\$ 4,795,532	\$ 12,381,196	\$ 13,399,289	\$ 28,995,064	\$ 29,700,139	\$ 6,265,378	\$ 4,901,226	\$ 5,679,637	\$ 5,003,776	\$ 134,194,985
Total Secondary Purchases	0	-	1,598	102	(0)	0	(0)	0	(0)	(0)	10,000	(0)	11,700
Total Purchased Power & Net Interchange	\$ 41,840,420	\$ 52,541,847	\$ 53,531,833	\$ 46,137,181	\$ 53,218,925	\$ 57,007,169	\$ 76,831,255	\$ 75,703,377	\$ 47,728,911	\$ 47,632,648	\$ 47,113,540	\$ 44,870,250	\$ 644,157,356
Wheeling & U. of F. Expense													
Firm Wheeling	\$ 11,398,268	\$ 11,175,784	\$ 10,910,806	\$ 10,623,632	\$ 10,037,630	\$ 10,264,443	\$ 10,672,700	\$ 10,405,925	\$ 10,225,763	\$ 10,891,286	\$ 11,014,515	\$ 11,181,539	\$ 128,802,293
Non-Firm Wheeling	788,114	505,483	1,071,400	1,175,770	442,029	1,035,360	1,251,970	1,608,500	788,312	1,076,399	901,238	1,428,833	12,073,409
Total Wheeling & U. of F. Expense	\$ 12,186,382	\$ 11,681,267	\$ 11,982,206	\$ 11,799,403	\$ 10,479,659	\$ 11,299,804	\$ 11,924,670	\$ 12,014,425	\$ 11,014,075	\$ 11,967,685	\$ 11,915,754	\$ 12,610,372	\$ 140,875,701

August 2, 2021
California ECAC 2020 Adjusted Actual Net Power Cost

Exhibit PAC/102

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total 2020
Coal Fuel Burn Expense													
Cholla	3,492,143	(8,032)	-	-	2,997,317	6,601,807	4,751,321	6,648,300	5,194,143	5,250,654	4,789,128	4,357,160	44,073,940
Colstrip	1,636,443	1,589,897	1,549,366	1,482,156	795,810	817,226	1,514,194	1,716,063	1,052,798	449,281	818,558	1,371,947	14,793,738
Craig	2,888,380	1,441,534	2,219,621	2,021,008	2,117,777	1,414,540	1,662,626	1,776,376	1,270,149	1,386,850	1,523,168	2,195,429	21,917,457
Dave Johnston	3,587,676	3,682,248	4,148,522	3,804,432	3,551,438	3,486,175	4,005,326	4,117,931	3,045,426	3,395,598	4,087,058	3,611,517	44,523,346
Hayden	736,475	575,443	1,034,110	796,321	555,878	741,642	1,036,768	876,100	449,589	507,248	533,341	796,744	8,639,658
Hunter	10,780,441	8,976,185	7,158,101	8,899,789	8,452,865	10,549,583	11,467,568	13,116,743	11,523,315	11,504,777	11,961,935	12,007,826	126,399,129
Huntington	7,727,400	5,931,466	7,837,301	5,229,260	4,845,656	5,430,453	5,710,881	9,844,196	11,840,704	9,737,869	8,848,516	10,886,093	93,869,793
Jim Bridger	15,651,941	13,380,083	18,625,712	12,893,151	11,691,061	13,340,810	15,350,552	18,048,565	15,452,746	19,534,186	17,361,197	15,364,336	186,694,341
Naughton 1 & 2	6,652,895	6,085,117	6,383,166	5,145,286	4,443,034	5,508,661	6,908,361	5,868,839	3,680,878	6,973,733	6,604,464	6,871,983	71,126,415
Wyodak	1,484,065	1,485,973	1,617,959	1,762,593	1,753,632	1,446,486	1,901,394	2,198,614	1,780,368	1,338,906	1,819,529	2,273,022	20,862,541
Total Coal Fuel Burn Expense	\$ 54,637,858	\$ 43,139,914	\$ 50,573,857	\$ 42,033,994	\$ 41,204,468	\$ 49,337,383	\$ 54,308,989	\$ 64,211,726	\$ 55,290,116	\$ 60,079,102	\$ 58,346,895	\$ 59,736,056	\$ 632,900,359
Gas Fuel Burn Expense													
Chehalis	\$ 6,922,036	\$ 4,540,837	\$ 6,017,687	\$ 3,444,006	\$ 3,189,609	\$ 2,069,773	\$ 4,009,995	\$ 4,705,602	\$ 5,113,343	\$ 7,126,668	\$ 5,018,602	\$ 5,857,943	\$ 58,016,102
Current Creek	5,973,766	4,383,603	441,765	3,504,739	3,920,117	3,292,369	4,441,413	4,515,285	4,907,761	4,538,448	3,673,860	5,548,220	49,141,345
Gadsby	18,641	-	-	-	74,092	317,379	1,088,927	1,645,594	1,017,987	328,014	282	-	4,490,915
Gadsby CT	169,237	163,592	281,151	154,506	130,616	71,121	119,357	678,669	284,216	114,001	117,133	118,041	2,401,639
Hermiston	2,503,297	1,902,753	1,975,478	1,549,099	230,308	1,675,333	1,412,592	2,438,857	2,237,327	1,924,837	3,054,011	3,343,085	24,246,976
Lake Side 1	6,401,528	5,047,011	4,574,420	458,073	3,669,609	3,347,979	5,990,779	5,315,230	4,941,439	4,282,589	3,265,441	6,321,411	53,615,508
Lake Side 2	4,811,225	6,716,288	8,836,213	5,057,814	2,457,163	4,650,058	4,767,743	6,357,360	5,530,244	5,587,938	4,971,653	5,455,513	65,199,212
Naughton 3	2,994	2,994	2,973	2,994	2,994	2,994	756,205	2,595,619	1,152,618	717,705	591,807	153,880	5,985,779
Total Gas Fuel Burn Expense	\$ 26,802,723	\$ 22,757,079	\$ 22,129,686	\$ 14,171,230	\$ 13,674,509	\$ 15,427,005	\$ 22,587,011	\$ 28,252,216	\$ 25,184,935	\$ 24,620,200	\$ 20,692,789	\$ 26,798,093	\$ 263,097,477
Other Generation													
Black Cap Solar	\$ 1,974	\$ 3,602	\$ 5,432	\$ 5,933	\$ 3,534	\$ 2,857	\$ 10,211	\$ 12,334	\$ 14,033	\$ 9,958	\$ 4,103	\$ 4,629	\$ 78,600
Blundell	343,791	1,740,154	774,881	355,231	336,559	319,057	345,026	408,695	347,683	343,093	309,424	390,421	6,014,015
Wind Integration Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Other Generation	\$ 345,765	\$ 1,743,756	\$ 780,313	\$ 361,164	\$ 340,093	\$ 321,913	\$ 355,237	\$ 421,029	\$ 361,716	\$ 353,051	\$ 313,527	\$ 395,051	\$ 6,092,615
Net Power Cost	\$ 123,526,238	\$ 122,281,941	\$ 127,566,231	\$ 105,229,033	\$ 111,799,176	\$ 123,954,789	\$ 156,493,785	\$ 153,679,882	\$ 122,677,796	\$ 121,126,050	\$ 114,823,213	\$ 130,158,662	\$ 1,513,316,797
Net Power Cost/Net System Load	\$24.09	\$25.98	\$26.00	\$25.52	\$24.77	\$26.46	\$27.86	\$26.93	\$26.18	\$26.35	\$24.00	\$23.98	

August 2, 2021
California ECAC 2020 Adjusted Actual Net Power Cost

Exhibit PAC/102

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total 2020
Net System Load	5,127,035	4,706,249	4,906,272	4,123,565	4,513,495	4,685,230	5,617,190	5,706,644	4,685,752	4,596,457	4,784,309	5,427,314	58,879,512
Special Sales For Resale													
Long Term Firm Sales													
Black Hills	2,002	2,272	3,515	7,935	8,580	13,247	14,056	10,751	18,530	12,483	10,015	6,100	109,488
Hurricane Sale	-	-	-	-	-	-	-	-	-	2	20	20	41
Total Long Term Firm Sales	2,002	2,272	3,515	7,935	8,580	13,247	14,056	10,751	18,530	12,485	10,035	6,120	109,529
Total Short Term Firm Sales	412,274	335,214	304,794	362,605	259,999	415,409	258,007	340,496	330,563	704,951	685,465	476,132	4,885,911
Total Secondary Sales	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Special Sales For Resale	414,276	337,486	308,310	370,540	268,579	428,656	272,063	351,247	349,093	717,436	695,500	482,252	4,995,440
Total Requirements	5,541,311	5,043,735	5,214,582	4,494,105	4,782,074	5,113,886	5,889,253	6,057,892	5,034,845	5,313,893	5,479,810	5,909,566	63,874,952
Purchased Power & Net Interchange													
Long Term Firm Purchases													
APS Supplemental	600	5,250	1,800	1,500	600	900	300	600	1,500	1,950	-	-	15,000
Cedar Springs Wind	-	-	-	-	-	-	-	-	11,881	8,865	31,546	93,241	145,532
Cedar Springs III Wind	-	-	-	-	-	-	-	-	-	-	-	46,700	46,700
Combine Hills Wind	15,622	28,583	10,106	20,687	8,971	11,349	9,812	8,018	(19,591)	10,037	9,971	7,676	121,240
Cove Mountain Solar	-	-	-	-	-	928	1,591	1,568	15,891	13,130	8,897	7,057	49,063
Cove Mountain Solar 2 - FaceBook	-	-	-	-	-	-	20,393	507	7,331	26,837	18,516	13,880	87,463
Deseret Purchase	39,878	25,120	32,746	12,090	16,015	19,464	32,810	36,224	26,810	26,436	39,353	48,472	355,418
Eagle Mountain - UAMPS/UMPA	4,136	3,880	3,388	3,296	4,120	7,254	8,776	8,032	5,200	3,720	3,654	5,296	60,752
Gemstate	-	-	-	-	10,568	15,903	13,478	11,422	-	-	-	-	51,371
Hunter Solar	-	-	-	-	-	-	-	-	-	-	-	-	-
Hurricane Purchase	256	260	216	179	149	176	221	648	313	217	181	206	3,022
MagCorp Reserves	-	-	-	-	-	-	-	-	-	-	-	-	-
Milford Solar - FaceBook Oregon	-	-	-	-	-	-	-	-	11,704	18,537	14,814	13,112	58,167
Millican Solar	-	-	-	-	-	-	-	-	-	-	-	-	-
Monsanto Reserves	-	-	-	-	-	-	-	-	-	-	-	-	-
Nucor	-	-	-	-	-	-	-	-	-	-	-	-	-
Old Mill Solar	309	770	882	1,234	1,328	1,420	1,697	1,040	1,082	863	484	412	11,521
Pavant III Solar	2,232	3,314	3,993	5,002	5,628	5,640	5,985	5,794	4,779	3,127	2,720	1,778	49,993
PGE Cove	1,019	953	1,018	986	1,019	986	1,019	1,019	986	1,019	988	1,013	12,026
Prineville Solar	-	-	-	-	-	-	-	-	-	-	-	-	-
Rock River Wind	20,742	16,844	13,214	12,037	8,352	9,769	7,276	5,737	9,894	14,716	16,951	15,642	151,175
Sigurd Solar	-	-	-	-	-	-	-	-	-	-	-	-	-
Small Purchases east	16	24	(0)	11	10	7	55	22	23	21	23	25	237
Small Purchases west	-	-	-	-	-	-	-	-	-	-	-	-	-
Amor IX - Univ of Utah	13,807	12,787	13,287	11,683	10,850	8,063	8,184	5,806	8,026	11,037	12,538	12,705	128,773
Three Buttes Wind	47,095	38,299	29,773	21,914	19,575	23,802	19,327	15,505	18,619	24,689	41,950	42,335	342,883
Top of the World Wind	55,483	51,305	41,447	32,389	31,903	31,027	34,619	28,466	30,622	38,472	74,655	68,860	519,249
Tri-State Purchase	8,632	10,080	12,863	10,400	8,216	-	-	-	-	-	-	-	50,191
Wolverine Creek Wind	23,398	15,450	17,999	13,731	16,915	16,172	10,853	12,548	11,173	18,432	17,442	11,303	185,417
Long Term Firm Purchases Total	233,225	212,919	182,730	147,140	144,221	152,860	176,397	142,958	146,244	222,104	294,681	389,713	2,445,191

August 2, 2021
California ECAC 2020 Adjusted Actual Net Power Cost

Exhibit PAC/102

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total 2020
Qualifying Facilities													
QF California	2,971	1,776	4,087	4,492	3,694	4,141	3,248	3,157	3,164	2,995	2,720	2,878	39,323
QF Idaho	9,766	7,249	9,305	10,444	14,555	13,070	11,460	8,614	8,366	9,127	8,900	9,166	120,023
QF Oregon	29,850	43,473	48,270	62,949	64,697	66,239	71,740	61,599	52,823	45,429	31,312	31,452	609,834
QF Utah	6,908	8,138	8,644	10,858	11,630	10,227	10,746	10,641	9,817	9,041	5,805	6,328	108,782
QF Washington	-	-	2	488	870	1,202	1,541	1,513	890	252	-	-	6,759
QF Wyoming	312	221	512	63	22	59	23	530	472	203	60	56	2,534
Biomass One QF	20,454	17,790	20,118	28,582	(28,582)	-	18,650	20,414	19,217	19,760	19,739	10,434	166,576
Chopin Wind QF	4,819	3,843	2,972	3,078	2,743	3,006	2,532	1,751	1,805	3,300	3,343	2,378	35,568
DCFP QF	18	20	23	18	71	98	152	186	100	116	72	34	907
Enterprise Solar I QF	12,415	16,400	17,424	22,182	26,289	26,483	27,338	25,121	20,750	16,824	12,804	10,912	234,941
Escalante 1 Solar QF	10,542	14,637	16,789	20,684	5,532	23,196	24,771	23,614	20,194	18,042	11,848	8,062	197,911
Escalante 2 Solar QF	10,565	14,849	16,765	20,855	23,766	23,551	25,279	24,058	20,264	18,116	11,764	8,545	218,379
Escalante 3 Solar QF	10,299	14,397	16,642	20,488	22,698	23,102	24,745	23,489	19,163	17,596	11,568	9,554	213,740
ExxonMobil QF	-	-	0	-	-	0	-	-	-	-	-	37	37
Footee Creek III Wind QF	-	-	-	-	-	-	-	-	-	-	-	-	-
Five Pine Wind QF	12,302	9,449	11,657	20,073	10,978	21,787	6,632	7,117	7,577	10,882	11,298	5,682	135,432
Granite Mountain East Solar QF	11,208	14,584	15,125	20,579	24,661	24,588	23,592	23,031	20,337	17,431	11,294	9,400	215,828
Granite Mountain West Solar QF	6,375	8,979	9,395	10,924	15,759	15,529	14,814	14,351	12,590	10,382	6,339	5,849	131,286
Iron Springs QF	11,277	14,961	15,610	20,784	24,571	24,613	24,527	23,616	20,498	17,694	11,648	9,958	219,758
Latigo Wind QF	18,267	16,685	17,731	13,905	11,117	15,796	9,350	9,818	9,483	12,389	14,547	14,400	163,488
Mountain Wind 1 QF	22,781	21,291	11,828	14,394	9,893	10,974	9,580	7,479	11,888	22,103	14,172	15,075	171,459
Mountain Wind 2 QF	32,290	28,071	16,558	17,591	12,199	14,254	11,864	8,827	14,152	27,006	17,863	19,046	219,720
North Point Wind QF	26,129	19,415	26,423	8,676	17,865	9,988	16,112	17,865	23,381	23,506	23,506	12,894	225,473
Oregon Wind Farm QF	15,588	17,776	13,981	15,061	11,259	18,882	19,999	13,871	9,435	1,228	10,473	7,393	154,946
Pavant II Solar QF	5,555	8,001	9,884	12,286	13,710	14,054	14,454	14,080	10,090	6,429	4,094	4,094	124,414
Pioneer Wind 1 QF	43,271	29,245	27,576	19,730	17,926	18,666	14,608	12,178	16,681	22,417	36,305	33,956	292,559
Power County North Wind QF	8,225	6,426	6,742	5,937	5,887	5,736	4,311	4,954	4,093	7,449	5,835	4,707	70,303
Power County South Wind QF	7,113	6,003	6,244	5,473	5,316	4,983	3,481	3,960	3,780	7,470	5,235	3,993	63,049
Roseburg Dillard QF	1,044	2,194	(206)	1,713	3,091	(27)	4,909	5,650	2,885	2,885	2,383	2,929	28,511
Sage I Solar QF	1,926	3,262	4,348	4,894	5,704	5,525	6,824	5,838	4,875	3,882	2,522	2,003	51,602
Sage II Solar QF	2,131	3,440	4,388	3,941	5,737	5,544	6,661	5,853	4,985	3,901	2,540	2,015	51,135
Sage III Solar QF	1,993	3,306	3,724	4,013	4,596	5,139	6,058	5,220	4,164	3,451	2,321	1,796	45,783
Spanish Fork Wind 2 QF	4,543	3,205	2,028	2,651	2,743	2,892	4,851	4,735	4,622	4,622	4,505	4,805	46,146
Sunnyside QF	-	-	19,331	37,105	32,222	36,653	32,275	38,264	28,792	33,014	33,654	30,987	322,298
Sweetwater Solar QF	7,855	13,030	14,868	19,796	21,342	19,819	21,051	18,166	14,858	11,532	8,671	6,960	177,948
Tesoro QF	233	2,837	1,888	605	97	109	-	63	80	300	472	3,059	9,743
Three Peaks Solar QF	11,718	16,178	16,425	21,730	26,073	24,609	25,357	24,458	21,112	19,204	12,342	10,614	229,822
Threemile Canyon Wind QF	1,768	2,485	2,278	2,331	2,239	3,011	2,913	2,232	1,201	2,248	1,438	1,055	25,199
Utah Pavant Solar QF	5,218	7,295	9,386	12,215	14,005	13,717	14,028	13,392	11,278	9,404	6,015	3,369	119,323
Utah Red Hills Solar QF	11,102	14,278	15,445	20,058	24,549	24,579	24,474	23,955	20,094	17,423	11,269	9,740	216,965
Qualifying Facilities Total	388,829	415,189	444,209	521,647	476,908	535,795	544,947	513,656	455,104	462,588	383,016	325,614	5,467,504
Mid-Columbia Contracts													
Grant Reasonable	-	-	-	-	-	-	-	-	-	-	-	-	-
Grant Surplus	8,742	9,691	7,211	6,206	10,947	10,673	10,909	8,851	5,876	5,476	8,085	8,904	101,571
Mid-Columbia Contracts Total	8,742	9,691	7,211	6,206	10,947	10,673	10,909	8,851	5,876	5,476	8,085	8,904	101,571
Total Long Term Firm Purchases	630,796	637,800	634,150	674,992	632,076	699,329	732,253	665,465	607,223	690,168	685,783	724,232	8,014,267
Storage & Exchange													
APS Exchange	137,679	69,785	-	-	(75,678)	(140,898)	(142,848)	(142,848)	(69,119)	77,414	137,293	142,804	(6,416)
BPA FC IV Wind	(680)	989	(1,127)	(145)	(1,694)	508	(1,022)	(1,546)	1,076	(2,141)	(7)	-	(5,789)
Cowlitz Swift	(9,483)	(19,187)	(19,615)	13,483	13,437	218	(537)	(6,245)	1,861	6,131	(2,759)	(1,469)	(24,165)
PSCo Exchange	7	345	108	-	-	25	396	(584)	(277)	103	171	16	310
SCL State Line	36,774	27,834	(11,007)	(8,809)	(3,348)	2,188	(164)	(9,169)	(18,892)	8,172	20,504	(10,834)	33,249
Total Storage & Exchange	164,297	79,765	(31,640)	4,529	(67,283)	(137,959)	(144,175)	(160,392)	(85,350)	89,679	155,202	130,517	(2,811)
Total Short Term Firm Purchases	83,084	417,006	730,422	619,908	881,227	958,026	1,126,869	692,647	195,584	59,453	233,581	204,575	6,202,383
Total Secondary Purchases	(1,666)	421	545	(2,069)	(200)	424	841	(3,285)	147	2,936	1,358	955	407
Total Purchased Power & Net Interchange	876,512	1,134,992	1,333,477	1,297,360	1,445,820	1,519,820	1,715,788	1,194,434	717,604	842,236	1,075,924	1,060,278	14,214,245

August 2, 2021
California ECAC 2020 Adjusted Actual Net Power Cost

Exhibit PAC/102

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total 2020
Coal Generation													
Cholla	143,675	(2,548)	(2,576)	(2,022)	118,638	197,684	189,598	265,352	214,515	213,335	191,874	141,949	1,669,474
Colstrip	106,692	95,429	95,462	92,006	44,736	46,996	83,091	100,995	52,005	27,258	48,446	93,210	886,326
Craig	107,578	106,277	96,743	103,595	108,059	85,397	90,471	94,550	78,866	61,025	83,026	107,171	1,122,758
Dave Johnston	346,740	361,559	400,543	379,269	342,015	327,613	394,796	408,345	295,220	323,172	403,833	342,499	4,325,604
Hayden	32,482	29,404	39,952	32,164	23,652	33,069	42,865	47,007	29,828	22,025	22,926	37,212	392,586
Hunter	600,488	489,209	399,289	335,206	581,498	553,587	606,657	715,597	632,740	653,445	683,201	692,899	6,943,816
Huntington	427,002	294,269	355,643	218,200	199,237	233,254	263,359	488,036	599,764	487,478	420,147	528,916	4,515,305
Jim Bridger	636,825	487,356	682,302	445,372	401,658	453,219	591,793	685,429	583,543	765,205	680,782	593,205	7,006,689
Naughton 1 & 2	234,031	213,517	223,050	178,999	146,680	192,787	235,686	196,362	138,073	252,607	241,427	253,998	2,507,217
Wyodak	93,541	83,974	86,839	97,892	96,514	101,874	116,774	128,716	116,938	96,881	125,247	119,848	1,265,038
Total Coal Generation	2,729,054	2,158,446	2,377,247	1,880,681	2,062,687	2,225,480	2,615,090	3,130,389	2,741,492	2,902,431	2,900,909	2,910,907	30,634,813
Gas Generation													
Chehalis	222,194	151,343	282,619	213,674	168,104	84,048	180,007	227,545	263,807	271,530	157,944	184,704	2,407,519
Current Creek	272,283	193,825	(1,023)	147,204	195,292	172,293	222,980	224,302	258,471	217,276	171,639	260,884	2,335,426
Gadsby	(488)	(346)	(248)	(234)	377	4,021	22,530	39,998	20,037	5,375	(339)	(350)	90,333
Gadsby CT	626	717	2,938	131	1,061	1,418	2,995	22,291	8,092	2,348	274	186	43,077
Hermiston	145,858	131,421	154,602	122,672	(482)	127,460	96,967	142,389	140,731	100,834	138,295	152,772	1,453,519
Lake Side 1	281,115	210,466	151,982	(608)	179,527	175,816	244,509	275,668	238,777	195,891	146,804	288,248	2,388,195
Lake Side 2	199,759	304,612	334,338	232,649	126,034	252,268	329,456	359,671	282,210	265,006	247,656	238,258	3,171,917
Naughton 3	(1,065)	(943)	(946)	(848)	(808)	(882)	27,229	83,654	21,116	16,256	10,081	(1,028)	151,816
Total Gas Generation	1,120,282	991,095	924,262	714,640	669,105	816,442	1,126,673	1,375,518	1,233,241	1,074,516	872,354	1,123,674	12,041,802
Hydro Generation													
West Hydro	394,395	355,913	174,977	269,629	301,943	218,812	136,232	103,396	76,291	140,974	216,456	297,411	2,686,429
East Hydro	25,504	31,154	58,175	39,664	33,831	33,426	39,020	37,335	19,127	9,906	11,379	12,282	350,803
Total Hydro Generation	419,899	387,067	233,152	309,293	335,774	252,238	175,252	140,731	95,418	150,880	227,835	309,693	3,037,232
Other Generation													
Black Cap Solar	83	213	235	334	361	325	614	366	391	311	162	156	3,553
Blundell	7,961	7,134	13,502	13,031	12,209	11,463	11,549	16,758	19,642	21,042	21,768	19,511	175,570
Cedar Springs II Wind	-	-	-	-	-	-	-	-	-	-	-	64,482	64,482
Dunlap I Wind	60,609	46,685	36,220	21,945	20,354	22,743	10,233	72	24,018	43,220	46,716	55,427	388,242
Ekola Flats Wind	-	-	-	-	-	-	-	-	-	-	-	36,054	36,054
Foote Creek I Wind	16,307	13,066	10,225	7,848	1,752	-	-	-	-	-	-	(2)	49,196
Glenrock Wind	52,485	40,579	33,537	26,979	27,309	28,196	24,745	21,583	24,019	29,979	45,731	47,627	402,769
Glenrock III Wind	19,908	16,158	13,200	10,030	10,149	10,598	9,258	7,960	8,907	11,059	18,814	18,587	154,628
Goodnoe Wind	26,451	28,233	28,568	28,362	28,572	33,922	30,811	26,412	20,365	29,984	25,135	20,017	326,832
High Plains Wind	49,796	40,849	33,028	17,002	20,082	27,343	22,328	17,036	27,225	29,136	39,813	35,177	358,815
Leaning Juniper 1	22,753	30,930	24,427	27,870	29,336	35,431	34,567	30,507	17,425	28,121	20,575	14,426	316,368
Marengo I Wind	8,332	42,033	44,018	46,791	39,581	42,751	35,911	33,033	28,170	46,301	46,543	35,244	448,708
Marengo II Wind	10	2,585	20,265	23,659	17,462	20,183	18,501	16,724	14,174	24,991	23,170	18,398	200,122
McFadden Ridge Wind	14,533	12,272	10,023	5,163	6,188	8,673	7,216	5,509	8,552	8,865	12,126	10,152	109,272
Pryor Mountain Wind	-	-	-	-	-	-	-	-	-	-	-	259	259
Rolling Hills Wind	49,332	38,304	31,320	23,105	23,618	23,746	21,352	18,017	20,394	26,116	45,092	42,825	363,221
Seven Mile Wind	55,113	44,136	39,416	32,953	26,115	28,439	24,076	18,774	27,918	37,054	47,108	46,754	427,856
Seven Mile II Wind	11,891	8,958	8,460	7,058	5,601	6,093	5,289	4,068	5,890	7,651	10,034	9,803	90,796
TB Flats Wind	-	-	-	-	-	-	-	-	-	-	-	30,117	30,117
TB Flats Wind II	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Other Generation	395,564	372,135	346,444	292,130	268,689	299,906	256,450	216,819	247,090	343,830	402,787	505,014	3,946,860
Total Resources	5,541,311	5,043,735	5,214,582	4,494,105	4,782,074	5,113,886	5,889,253	6,057,892	5,034,845	5,313,893	5,479,810	5,909,566	63,874,952

Application No. 21-08-_____
Exhibit No. PAC/103
Witness: Douglas R. Staples

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Net Power Cost Analysis—Adjusted Actual/Projected 2021 Net Power Costs

August 2, 2021

California ECAC 2021 Adjusted Actual / Projected Net Power Cost

Exhibit PAC/103

	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total 2021
Special Sales For Resale													
Long Term Firm Sales													
Black Hills	\$ 303,229	\$ 335,305	\$ 321,392	\$ 558,272	\$ 387,470	\$ 610,430	\$ 743,275	\$ 684,290	\$ 702,097	\$ 711,911	\$ 674,483	\$ 732,145	\$ 6,764,299
Hurricane Sale	917	1,007	981	1,040	1,052	540	540	540	540	540	540	540	8,774
Leaning Juniper Revenue	2,905	14,706	6,344	(15,819)	13,203	7,715	21,897	24,824	16,289	9,678	7,498	8,946	118,186
Total Long Term Firm Sales	\$ 307,050	\$ 351,018	\$ 328,718	\$ 543,493	\$ 401,725	\$ 618,685	\$ 765,712	\$ 709,653	\$ 718,925	\$ 722,129	\$ 682,520	\$ 741,631	\$ 6,891,259
Total Short Term Firm Sales	\$ 12,802,582	\$ 19,180,290	\$ 12,820,867	\$ 12,088,533	\$ 12,305,306	\$ 30,710,601	\$ 44,224,745	\$ 51,140,983	\$ 57,933,661	\$ 37,912,859	\$ 38,462,703	\$ 40,762,844	\$ 370,345,972
Total Secondary Sales	-	-	-	(574)	574	-	-	-	-	-	-	-	0
Total Special Sales For Resale	\$ 13,109,632	\$ 19,531,308	\$ 13,149,584	\$ 12,631,452	\$ 12,707,604	\$ 31,329,286	\$ 44,990,456	\$ 51,850,637	\$ 58,652,587	\$ 38,634,988	\$ 39,145,223	\$ 41,504,475	\$ 377,237,231
Purchased Power & Net Interchange													
Long Term Firm Purchases													
Cedar Springs Wind	\$ 1,433,834	\$ 923,575	\$ 960,172	\$ 902,074	\$ 881,041	\$ 1,026,445	\$ 1,060,660	\$ 1,060,660	\$ 1,026,445	\$ 1,060,660	\$ 1,026,445	\$ 1,060,660	\$ 12,422,674
Cedar Springs III Wind	1,139,707	760,648	772,525	750,440	686,074	779,959	805,958	805,958	779,959	805,958	779,959	805,958	9,673,102
Combine Hills Wind	441,377	547,648	534,512	320,257	426,978	401,855	448,041	381,825	356,540	373,462	455,099	566,954	5,254,549
Cove Mountain Solar	190,930	242,729	278,918	398,429	479,605	457,334	443,628	419,764	359,961	289,769	208,202	171,172	3,940,440
Cove Mountain Solar 2 - FaceBook	385,337	1,823,808	532,580	999,222	1,112,306	1,136,848	1,102,776	1,043,455	894,797	720,312	514,667	423,130	10,689,238
Deseret Purchase	3,027,849	2,998,638	2,940,119	2,136,040	2,231,134	2,552,753	2,979,150	2,979,150	2,947,854	2,946,551	2,674,022	2,936,119	33,349,377
Eagle Mountain - UAMPS/UMPA	199,301	182,309	165,365	146,988	173,900	284,602	436,746	407,436	241,072	156,349	153,678	228,970	2,776,717
Gemstate	150,059	150,059	100,610	150,059	150,059	143,152	143,152	143,152	143,152	143,152	143,152	143,152	1,702,910
Graphite Solar	-	-	-	-	-	-	-	-	-	-	-	8,726	8,726
Hunter Solar	-	547,744	609,120	972,486	732,774	797,428	758,093	712,634	664,479	567,050	402,182	326,655	7,090,645
Hurricane Purchase	19,381	18,481	14,769	14,362	9,631	14,960	14,960	14,960	14,960	14,960	14,960	14,960	181,341
MagCorp Reserves	344,048	327,810	348,804	334,330	345,704	409,020	413,030	392,980	388,970	372,930	433,080	413,030	4,523,737
Millican Solar	-	206,916	237,604	299,843	238,432	333,291	375,334	331,656	266,914	174,771	111,940	76,815	2,653,514
Milford Solar - FaceBook Oregon	382,777	417,936	1,041,907	822,901	992,045	839,927	747,990	720,079	671,702	541,718	394,119	310,565	7,883,666
Monsanto Reserves	1,666,980	2,129,243	1,666,980	1,666,980	1,666,980	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	20,463,829
Nucor	609,450	609,450	609,450	609,450	609,450	594,150	594,150	594,150	594,150	594,150	594,150	594,150	7,206,300
Old Mill Solar	9,205	24,272	27,821	52,993	49,003	-	-	-	-	-	-	-	163,295
Pavant III Solar	55,373	216,957	76,730	146,763	159,334	-	-	-	-	-	-	-	655,157
PGE Cove	11,759	(46,518)	11,759	11,759	11,759	12,899	12,899	12,899	12,899	12,899	12,899	12,899	90,810
Prineville Solar	-	146,111	149,700	207,280	221,207	221,430	249,362	220,343	177,331	116,113	74,370	51,034	1,834,280
Rock River Wind	514,018	596,926	434,722	371,360	267,012	-	-	-	-	-	-	-	2,184,037
Sigurd Solar	-	-	124,859	634,220	646,182	710,144	660,236	605,233	565,052	458,516	322,228	270,678	4,997,348
Small Purchases east	2,597	2,527	2,225	2,088	1,776	1,203	1,226	1,202	1,153	1,157	1,209	1,176	19,539
Small Purchases west	-	-	-	-	-	-	-	-	-	-	-	-	-
Amor IX - Univ of Utah	279,473	882,740	300,666	343,932	289,796	-	-	-	-	-	-	-	2,096,608
Three Buttes Wind	2,117,297	1,630,150	1,356,865	1,352,336	1,305,728	1,205,304	804,843	950,802	1,185,464	1,741,196	2,346,698	2,701,069	18,697,752
Top of the World Wind	4,767,549	3,123,515	2,566,302	2,696,323	2,341,146	2,398,843	1,719,857	1,873,298	2,296,246	3,519,349	4,486,125	4,898,057	36,686,608
UT Solar Adjustment	-	-	-	-	-	(969,285)	(936,120)	(876,799)	(728,316)	(581,664)	(376,089)	(293,208)	(4,761,482)
Wolverine Creek Wind	766,984	1,320,589	700,446	764,877	768,206	840,940	669,552	639,635	751,599	830,847	959,867	958,779	9,972,322
Long Term Firm Purchases Total	\$ 18,515,284	\$ 19,784,265	\$ 16,565,530	\$ 17,107,792	\$ 16,797,263	\$ 15,859,867	\$ 15,172,187	\$ 15,101,137	\$ 15,279,050	\$ 16,526,870	\$ 17,399,629	\$ 18,348,165	\$ 202,457,041

California ECAC 2021 Adjusted Actual / Projected Net Power Cost

Exhibit PAC/103

	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total 2021
Qualifying Facilities													
QF California	\$ 221,601	\$ 48,270	\$ 164,620	\$ 168,092	\$ 36,616	\$ 264,043	\$ 176,178	\$ 142,348	\$ 133,461	\$ 136,480	\$ 142,828	\$ 182,897	\$ 1,817,435
QF Idaho	579,590	497,260	527,841	481,396	471,320	499,723	459,624	383,689	347,836	380,400	363,144	355,298	5,347,122
QF Oregon	2,258,810	2,623,728	3,467,267	4,326,432	4,354,576	5,764,450	5,462,940	5,158,550	4,431,711	3,490,075	2,540,086	2,703,410	46,582,035
QF Utah	712,402	740,809	915,015	1,054,867	1,121,192	1,155,089	1,078,375	1,069,489	1,003,757	958,244	845,671	770,935	11,425,844
QF Washington	-	-	-	19,952	44,511	49,280	55,428	1,643	24,365	2,049	-	-	197,227
QF Wyoming	1,246	239	165	4,464	3,750	8,827	14,385	13,362	10,012	11,949	12,179	15,981	96,559
Biomass One QF	1,696,738	1,527,609	1,709,402	1,562,477	1,095,609	459,606	1,436,000	1,431,519	1,370,863	1,467,011	1,401,172	811,834	15,969,839
Chopin Wind QF	137,530	200,109	170,883	148,761	151,238	-	-	-	-	-	-	-	808,522
DCFP QF	592	524	114	657	1,451	7,210	30,046	39,670	30,987	12,667	5,484	5,436	134,837
Enterprise Solar I QF	623,646	764,831	890,957	1,098,416	1,313,623	1,382,054	1,552,203	1,505,433	1,180,042	955,809	706,377	545,566	12,518,958
Escalante 1 Solar QF	561,587	646,998	841,344	1,059,930	1,227,781	1,306,559	1,438,731	1,385,249	1,095,951	874,775	643,296	508,060	11,590,260
Escalante 2 Solar QF	534,943	618,177	810,357	1,007,925	1,173,473	1,235,528	1,359,543	1,300,450	1,032,836	820,378	601,838	473,100	10,968,548
Escalante 3 Solar QF	522,145	596,589	775,452	974,230	1,131,106	1,206,417	1,320,931	1,265,996	1,003,819	750,960	551,605	434,576	10,533,826
ExxonMobil QF	-	-	290	-	-	-	-	-	-	-	-	-	290
Five Pine Wind QF	483,993	810,782	977,282	517,726	493,220	538,166	621,525	599,633	746,134	737,773	876,316	873,556	8,276,106
Granite Mountain East Solar QF	564,331	695,085	866,815	1,034,570	1,212,293	1,259,680	1,335,982	1,265,220	977,968	810,379	582,140	467,391	11,071,853
Granite Mountain West Solar QF	366,409	453,525	563,445	691,414	808,994	833,309	885,762	835,986	646,535	536,651	384,176	309,016	7,315,223
Iron Springs QF	578,535	709,286	880,171	1,068,170	1,257,705	1,284,495	1,347,967	1,321,760	1,005,036	816,736	579,100	499,587	11,348,547
Latigo Wind QF	950,514	972,355	1,024,751	934,273	774,454	745,769	682,129	567,674	618,825	807,122	702,995	746,997	9,527,858
Mountain Wind 1 QF	999,815	1,302,186	455,339	621,159	424,948	506,044	409,953	441,735	457,892	678,977	905,337	1,069,619	8,273,003
Mountain Wind 2 QF	1,465,418	1,868,666	746,805	923,115	645,203	916,030	758,096	735,904	761,711	1,017,825	1,404,943	1,586,724	12,830,440
North Point Wind QF	1,101,200	1,879,791	476,857	1,067,388	899,032	1,219,941	1,445,365	1,484,098	1,774,582	1,714,383	1,862,305	1,807,583	16,732,525
Orchard Wind 1 QF	-	45,119	34,541	51,246	47,398	-	-	-	-	-	-	-	178,303
Orchard Wind 2 QF	-	34,138	27,791	45,254	49,099	-	-	-	-	-	-	-	156,282
Orchard Wind 3 QF	-	31,288	39,070	50,669	47,074	-	-	-	-	-	-	-	168,101
Orchard Wind 4 QF	-	41,308	41,358	45,823	45,500	-	-	-	-	-	-	-	173,990
Oregon Wind Farm QF	418,043	1,346,268	1,041,011	1,133,335	1,138,541	1,232,548	1,244,072	1,126,416	899,250	731,888	804,124	1,034,862	12,150,358
Pavant II Solar QF	193,761	205,128	286,500	417,817	450,291	478,033	553,909	543,142	422,777	330,485	205,538	166,658	4,254,038
Pioneer Wind 1 QF	1,388,301	1,008,856	904,826	695,187	558,974	739,286	855,024	824,438	540,837	865,851	1,351,367	1,086,496	10,819,446
Power County North Wind QF	432,606	633,391	356,350	457,227	357,166	351,208	367,188	365,344	379,222	513,261	524,964	604,018	5,341,943
Power County South Wind QF	405,028	618,917	326,158	416,898	322,967	312,828	324,499	340,451	335,797	449,413	473,672	523,696	4,850,323
Roseburg Dillard QF	101,680	341,461	224,851	137,079	198,871	88,024	184,094	164,917	71,575	73,646	74,283	62,700	1,723,180
Sage I Solar QF	111,289	137,681	169,581	194,054	193,006	262,709	337,883	333,611	208,547	155,711	104,870	75,399	2,284,341
Sage II Solar QF	113,038	141,427	187,015	180,987	213,850	263,006	338,244	333,977	208,784	155,870	105,000	75,469	2,316,665
Sage III Solar QF	102,542	126,464	133,314	176,845	200,780	214,874	275,731	272,050	172,117	130,624	88,886	64,050	1,958,276
Spanish Fork Wind 2 QF	283,806	109,605	164,766	175,108	142,543	214,368	288,600	313,056	271,942	241,047	250,345	260,335	2,715,521
Sunnyside QF	2,627,831	2,879,970	2,638,554	1,782,052	2,705,638	2,925,018	2,977,195	2,990,479	2,754,883	2,426,677	2,713,367	2,519,596	31,941,259
Sweetwater Solar QF	362,232	467,615	644,118	758,040	823,194	985,566	1,121,978	1,038,739	815,928	628,053	300,112	202,134	8,147,708
Tesoro QF	351	3,196	3,864	787	4	11,120	15,475	26,432	13,690	10,948	14,520	67,165	167,551
Threemile Canyon Wind QF	54,700	210,276	160,200	190,691	187,435	-	-	-	-	-	-	-	803,301
Three Peaks Solar QF	453,340	581,098	762,238	961,028	1,070,544	913,116	1,045,097	1,002,590	793,842	671,675	444,511	371,805	9,070,884
Utah Pavant Solar QF	256,837	227,505	339,298	458,410	563,726	655,441	750,517	705,242	589,010	448,089	276,633	228,636	5,499,344
Utah Red Hills Solar QF	545,996	667,739	901,256	1,120,239	1,359,417	1,228,925	1,501,650	1,444,794	1,308,209	807,396	588,016	463,540	11,937,178
Qualifying Facilities Total	\$ 22,212,426	\$ 26,815,266	\$ 25,651,831	\$ 28,214,190	\$ 29,318,116	\$ 31,518,287	\$ 34,052,315	\$ 32,775,083	\$ 28,440,729	\$ 25,621,277	\$ 23,431,201	\$ 21,974,128	\$ 330,024,851
Mid-Columbia Contracts													
Grant Reasonable	(177,927)	(177,927)	(172,532)	(177,927)	(177,927)	(174,928)	(174,928)	(174,928)	(174,928)	(174,928)	(174,928)	(174,928)	(2,108,740)
Grant Meaningful Priority	-	-	-	-	-	2,396,350	2,396,350	2,396,350	2,396,350	2,396,350	2,396,350	2,396,350	16,774,450
Grant - Priest Rapids	-	-	-	-	-	179,999	179,999	179,999	179,999	179,999	179,999	179,999	1,259,990
Grant Surplus	179,999	179,999	182,639	179,999	179,999	-	-	-	-	-	-	-	902,633
Mid-Columbia Contracts Total	\$ 2,071	\$ 2,071	\$ 10,107	\$ 2,071	\$ 2,071	\$ 2,401,420	\$ 2,401,420	\$ 2,401,420	\$ 2,401,420	\$ 2,401,420	\$ 2,401,420	\$ 2,401,420	\$ 16,828,333
Total Long Term Firm Purchases	\$ 40,729,782	\$ 46,601,602	\$ 42,227,469	\$ 45,324,053	\$ 46,117,450	\$ 49,779,575	\$ 51,625,923	\$ 50,277,641	\$ 46,121,200	\$ 44,549,568	\$ 43,232,250	\$ 42,723,714	\$ 549,310,225
Storage & Exchange													
APS Exchange	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cowlitz Swift	-	-	-	-	-	-	-	-	-	-	-	-	-
PSCo Exchange	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	5,400,000
SCL State Line	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Storage & Exchange	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 5,400,000
Total Short Term Firm Purchases	\$ 622,856	\$ (1,451,860)	\$ 1,553,503	\$ 4,042,601	\$ 1,297,350	\$ 29,495,459	\$ 54,024,039	\$ 48,579,797	\$ 45,332,368	\$ 20,416,962	\$ 22,352,195	\$ 38,009,404	\$ 264,274,675
Total Secondary Purchases	(0)	0	(0)	-	(0)	-	-	-	-	-	-	-	(0)
Total Purchased Power & Net Interchange	\$ 41,802,638	\$ 45,599,741	\$ 44,230,972	\$ 49,816,654	\$ 47,864,800	\$ 79,725,034	\$ 106,099,962	\$ 99,307,438	\$ 91,903,567	\$ 65,416,530	\$ 66,034,445	\$ 81,183,118	\$ 818,984,901

California ECAC 2021 Adjusted Actual / Projected Net Power Cost

Exhibit PAC/103

	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total 2021
Wheeling & U. of F. Expense													
Firm Wheeling	\$ 11,493,377	\$ 11,108,659	\$ 13,450,471	\$ 11,841,156	\$ 11,408,855	\$ 12,515,748	\$ 13,136,192	\$ 13,207,889	\$ 12,237,905	\$ 13,556,533	\$ 13,763,344	\$ 14,450,504	\$ 152,170,631
Non-Firm Wheeling	722,668	823,495	584,110	1,121,297	815,179	-	-	-	-	-	-	-	4,066,750
Total Wheeling & U. of F. Expense	\$ 12,216,045	\$ 11,932,154	\$ 14,034,580	\$ 12,962,453	\$ 12,224,034	\$ 12,515,748	\$ 13,136,192	\$ 13,207,889	\$ 12,237,905	\$ 13,556,533	\$ 13,763,344	\$ 14,450,504	\$ 156,237,381

California ECAC 2021 Adjusted Actual / Projected Net Power Cost

Exhibit PAC/103

	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total 2021
Coal Fuel Burn Expense													
Cholla	\$ 50,052	\$ (0)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 50,052
Colstrip	1,676,659	1,291,056	1,772,641	883,247	978,180	1,257,726	1,391,091	1,502,581	1,341,323	881,539	972,981	1,279,218	15,228,244
Craig	2,329,341	1,938,368	2,151,511	2,196,588	2,168,336	993,658	1,286,988	1,736,454	1,696,648	1,614,256	1,620,509	1,637,543	21,370,200
Dave Johnston	3,494,883	3,563,370	3,434,747	2,398,185	3,907,782	3,061,127	3,148,630	3,862,967	3,536,775	3,731,418	3,313,266	3,830,663	41,283,813
Hayden	1,028,217	859,283	924,916	805,494	621,625	1,151,301	1,124,865	940,923	687,372	998,816	1,023,878	1,078,313	11,245,003
Hunter	12,085,636	10,061,518	10,880,002	10,110,989	10,068,337	8,148,804	8,928,729	9,160,929	8,235,630	9,319,084	9,661,064	9,939,343	116,600,065
Huntington	9,133,847	9,080,817	9,459,295	9,943,160	10,234,964	8,163,071	9,083,307	9,090,557	7,980,224	7,513,914	8,568,867	10,531,131	108,783,156
Jim Bridger	13,390,769	14,008,681	18,003,236	13,551,678	17,069,185	12,345,855	20,905,667	20,768,489	18,454,193	17,676,396	17,619,929	17,548,198	201,342,274
Naughton 1 & 2	6,877,365	5,212,414	5,616,908	2,876,136	4,391,958	6,234,293	6,793,048	6,916,170	6,631,793	7,213,564	6,220,823	6,171,471	71,155,943
Wyodak	1,928,353	1,144,054	1,827,439	1,458,613	1,565,618	1,959,649	2,566,990	2,322,782	2,129,181	2,215,861	1,550,015	1,203,515	21,872,069
Total Coal Fuel Burn Expense	\$ 51,995,124	\$ 47,159,560	\$ 54,070,695	\$ 44,224,089	\$ 51,005,986	\$ 43,315,485	\$ 55,229,315	\$ 56,301,852	\$ 50,693,140	\$ 51,164,848	\$ 50,551,330	\$ 53,219,396	\$ 608,930,820
Gas Fuel Burn Expense													
Chehalis	\$ 5,927,705	\$ 6,853,641	\$ 6,441,153	\$ 6,318,969	\$ 3,017,204	\$ 2,583,669	\$ 5,200,069	\$ 4,865,059	\$ 4,939,343	\$ 6,221,244	\$ 4,815,189	\$ 5,960,784	\$ 63,144,030
Curran Creek	6,107,319	6,973,961	5,244,474	4,371,186	4,721,089	4,564,084	5,877,006	3,959,564	3,648,744	4,626,173	6,602,888	4,970,802	61,667,288
Gadsby	82,147	(268)	-	-	107,482	580,490	741,992	853,498	804,234	664,379	652,787	1,215,769	5,702,509
Gadsby CT	25,446	123,680	122,009	135,801	69,809	362,436	652,500	636,821	621,608	670,841	589,619	1,125,992	5,136,562
Hermiston	2,835,397	4,249,790	2,694,088	916,890	2,938,272	542,306	1,772,897	1,726,116	2,041,262	1,421,992	1,754,669	2,114,640	25,008,318
Lake Side 1	5,536,856	6,591,792	5,211,116	5,172,789	4,922,549	3,668,677	5,604,278	5,471,648	4,628,620	5,439,508	5,905,722	5,012,647	63,166,203
Lake Side 2	5,910,133	6,780,030	4,593,730	4,454,220	5,767,034	2,754,251	3,346,377	3,105,439	3,035,739	3,479,287	4,208,768	4,626,287	52,061,294
Naughton 3	201,162	749,619	204,615	1,697,214	1,219,155	909,548	1,528,427	1,596,527	1,144,701	1,464,514	1,042,253	3,267,689	15,025,425
Total Gas Fuel Burn Expense	\$ 26,626,164	\$ 32,322,245	\$ 24,511,185	\$ 23,067,071	\$ 22,762,594	\$ 15,965,460	\$ 24,723,545	\$ 22,214,671	\$ 20,864,251	\$ 23,987,938	\$ 25,571,896	\$ 28,294,610	\$ 290,911,630
Other Generation													
Black Cap Solar	\$ 3,158	\$ 8,508	\$ 7,272	\$ 13,091	\$ 10,560	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 42,589
Blundell Bottoming Cycle	-	-	-	-	-	165,082	170,510	170,557	165,117	169,735	108,592	127,851	1,077,444
Blundell	343,918	386,078	398,944	460,677	471,818	414,321	384,162	406,143	424,511	415,482	229,466	246,405	4,581,924
Total Other Generation	\$ 347,075	\$ 394,586	\$ 406,216	\$ 473,767	\$ 482,378	\$ 579,403	\$ 554,672	\$ 576,700	\$ 589,628	\$ 585,218	\$ 338,058	\$ 374,256	\$ 5,701,958
Net Power Cost	\$ 119,877,413	\$ 117,876,978	\$ 124,104,065	\$ 117,912,584	\$ 121,632,187	\$ 120,771,845	\$ 154,753,230	\$ 139,757,913	\$ 117,635,903	\$ 116,076,080	\$ 117,113,850	\$ 136,017,409	\$ 1,503,529,458

Application No. 21-08-_____
Exhibit No. PAC/104
Witness: Douglas R. Staples

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Net Power Cost Analysis—Projected 2022 Net Power Costs

August 2, 2021

California ECAC 2022 Projected Net Power Cost

Exhibit PAC/104

	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total 2022
Special Sales For Resale													
Long Term Firm Sales													
Black Hills	\$ 684,840	\$ 651,124	\$ 715,551	\$ 463,545	\$ 406,679	\$ 605,206	\$ 733,040	\$ 701,878	\$ 674,345	\$ 684,072	\$ 695,621	\$ 734,640	\$ 7,750,540
Hurricane Sale	540	540	540	540	540	540	540	540	540	540	540	540	6,475
Leaning Juniper Revenue	8,068	7,601	9,462	4,912	3,927	6,910	17,829	20,473	14,692	8,897	6,870	7,937	117,580
Total Long Term Firm Sales	\$ 693,448	\$ 659,264	\$ 725,552	\$ 468,997	\$ 411,145	\$ 612,656	\$ 751,409	\$ 722,891	\$ 689,576	\$ 693,508	\$ 703,030	\$ 743,117	\$ 7,874,595
Total Short Term Firm Sales	\$ 34,565,384	\$ 21,049,559	\$ 25,445,540	\$ 14,920,294	\$ 14,509,669	\$ 20,741,744	\$ 31,185,816	\$ 36,713,145	\$ 33,215,983	\$ 25,401,937	\$ 20,735,335	\$ 17,930,656	\$ 296,415,062
Total Secondary Sales	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Special Sales For Resale	\$ 35,258,832	\$ 21,708,823	\$ 26,171,092	\$ 15,389,292	\$ 14,920,814	\$ 21,354,399	\$ 31,937,225	\$ 37,436,037	\$ 33,905,559	\$ 26,095,446	\$ 21,438,365	\$ 18,673,773	\$ 304,289,657
Purchased Power & Net Interchange													
Long Term Firm Purchases													
Cedar Springs Wind	692,182	561,346	1,060,660	1,026,445	1,060,660	1,026,445	1,060,660	1,060,660	1,026,445	1,060,660	1,026,445	1,060,660	11,723,272
Cedar Springs Wind III	525,964	426,547	805,958	779,959	805,958	779,959	805,958	805,958	779,959	805,958	779,959	805,958	8,908,094
Combine Hills Wind	382,040	462,911	563,228	559,423	477,324	411,902	459,242	391,371	365,453	382,799	466,477	581,128	5,503,297
Cove Mountain Solar	184,583	193,926	338,034	367,992	423,558	455,521	441,868	418,099	358,534	288,620	207,377	170,493	3,848,605
Cove Mountain Solar II	458,099	481,286	838,933	913,283	1,051,186	1,130,512	1,096,629	1,037,639	889,810	716,297	511,782	420,758	9,546,214
Deseret Purchase	2,840,098	2,915,128	2,727,553	2,521,220	2,533,278	2,590,890	3,059,829	3,059,829	3,027,673	3,012,935	2,698,076	2,901,730	33,888,237
Eagle Mountain - UAMPS/UMPA	176,341	157,638	141,030	-	-	-	-	-	-	-	-	-	475,008
Gemstate	143,152	143,152	143,152	143,152	143,152	143,152	143,152	143,152	143,152	143,152	143,152	143,152	1,717,824
Graphite Solar	315,660	357,582	564,720	619,746	695,093	713,256	695,674	650,775	583,233	486,297	359,441	268,882	6,310,359
Horseshoe Solar	-	-	-	-	-	-	649,761	615,683	512,127	411,472	254,320	201,944	2,645,307
Hunter Solar	373,043	422,907	644,277	672,412	766,749	793,441	754,302	709,070	661,156	564,215	400,171	325,021	7,086,765
Hurricane Purchase	14,960	14,960	14,960	14,960	14,960	14,960	14,960	14,960	14,960	14,960	14,960	14,960	179,516
MagCorp Reserves	372,930	368,920	372,930	376,940	376,940	376,940	372,930	372,930	344,860	364,910	372,930	364,910	4,439,070
Milican Solar	90,121	137,530	210,849	265,395	314,995	342,866	386,117	341,184	274,582	179,792	115,156	79,022	2,737,608
Milford Solar	355,955	409,907	604,638	672,546	790,680	833,649	742,399	714,697	666,681	537,668	391,173	308,226	7,028,220
Monsanto Reserves	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	1,666,667	20,000,000
Nucor	594,150	594,150	594,150	594,150	594,150	594,150	594,150	594,150	594,150	594,150	594,150	594,150	7,129,800
Old Mill Solar	-	-	-	-	-	-	-	-	-	-	-	-	-
Pavant III Solar	-	-	-	-	-	-	-	-	-	-	-	-	-
PGE Cove	12,899	12,899	12,899	12,899	12,899	12,899	12,899	12,899	12,899	12,899	12,899	12,899	154,785
Prineville Solar	61,904	94,469	140,083	176,321	209,274	227,791	256,526	226,673	182,425	119,449	76,506	52,500	1,823,922
Rock River Wind	-	-	-	-	-	-	-	-	-	-	-	-	-
Rocket Solar	-	-	-	-	-	-	-	-	-	13,491	255,513	211,145	480,149
Sigurd Solar	311,118	347,365	512,316	559,359	642,898	706,593	656,935	602,207	562,226	456,223	320,617	269,324	5,947,182
Small Purchases east	1,173	1,213	1,172	1,172	1,233	1,203	1,226	1,202	1,153	1,157	1,209	1,176	14,288
Small Purchases west	-	-	-	-	-	-	-	-	-	-	-	-	-
Soda Lake Geothermal	-	-	-	-	-	-	-	-	-	-	-	-	-
Three Buttes Wind	2,790,662	1,806,920	2,141,628	1,609,251	1,428,678	1,205,304	804,843	950,802	1,185,464	1,741,196	2,346,698	2,701,069	20,712,516
Top of the World Wind	5,436,528	3,612,747	4,245,733	3,266,227	2,910,525	2,398,843	1,719,857	1,873,298	2,296,246	3,519,349	4,486,125	4,898,057	40,663,534
Tri-State Purchase	-	-	-	-	-	-	-	-	-	-	-	-	-
UT Solar Adjustment	(541,029)	(605,122)	(1,169,630)	(1,299,093)	(1,513,549)	(1,550,024)	(2,149,849)	(2,011,881)	(1,693,248)	(1,394,180)	(1,147,788)	(869,353)	(15,944,747)
Wolverine Creek Wind	769,735	899,379	1,146,015	1,054,117	799,585	851,108	677,648	647,369	760,687	840,892	971,473	970,371	10,388,378
Long Term Firm Purchases Total	\$ 18,028,933	\$ 15,484,424	\$ 18,321,953	\$ 16,574,542	\$ 16,206,893	\$ 15,728,025	\$ 14,924,382	\$ 14,899,393	\$ 15,217,295	\$ 16,541,026	\$ 17,325,488	\$ 18,154,849	\$ 197,407,203

California ECAC 2022 Projected Net Power Cost

Exhibit PAC/104

	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total 2022
Qualifying Facilities													
QF California	\$ 162,633	\$ 172,651	\$ 205,751	\$ 212,594	\$ 193,211	\$ 159,233	\$ 134,854	\$ 130,374	\$ 123,448	\$ 127,844	\$ 126,171	\$ 146,640	\$ 1,895,406
QF Idaho	522,317	485,716	524,279	455,588	489,276	616,519	646,699	575,846	527,267	553,523	526,156	613,053	6,536,240
QF Oregon	2,767,508	2,985,364	3,999,426	5,027,644	5,387,968	5,691,881	5,580,713	5,334,306	4,531,951	3,459,567	2,367,692	2,265,849	49,399,870
QF Utah	848,618	885,366	1,056,273	1,100,403	1,208,104	1,228,948	1,145,332	1,137,818	1,069,438	1,017,171	896,403	815,062	12,408,936
QF Washington	-	-	-	5,769	20,936	50,654	56,972	52,342	25,045	2,284	-	-	214,001
QF Wyoming	10,075	8,452	10,106	6,275	5,030	3,054	8,330	7,517	4,210	5,954	6,819	10,449	86,270
Biomass One QF	1,267,643	1,228,418	1,357,354	1,474,648	963,426	476,188	1,470,267	1,457,176	1,399,895	1,498,754	1,431,020	829,096	14,853,885
DCFP QF	4,070	4,892	3,892	2,838	2,994	5,684	21,446	30,755	28,479	10,800	5,245	5,055	126,149
Enterprise Solar I QF	614,859	748,994	974,310	1,107,272	1,245,638	1,373,505	1,524,913	1,501,220	1,172,076	949,208	700,536	541,066	12,453,598
Escalante 1 Solar QF	562,807	675,596	877,224	1,006,684	1,179,056	1,296,956	1,406,566	1,385,489	1,086,234	867,742	639,811	504,107	11,488,271
Escalante 2 Solar QF	528,800	634,303	826,459	946,736	1,115,939	1,226,322	1,329,310	1,299,965	1,023,737	813,742	598,232	469,523	10,813,068
Escalante 3 Solar QF	515,134	620,061	802,066	921,520	1,088,676	1,197,100	1,293,956	1,264,776	995,093	744,863	548,273	431,094	10,422,610
ExxonMobil QF	-	-	-	-	-	-	-	-	-	-	-	-	-
Five Pine Wind QF	533,030	876,180	791,676	830,464	507,541	559,614	664,263	614,829	777,853	769,372	905,957	907,876	8,738,655
Granite Mountain East Solar QF	546,621	611,857	890,164	982,955	1,148,321	1,250,346	1,322,763	1,258,482	971,017	804,688	577,589	463,868	10,828,670
Granite Mountain West Solar QF	361,832	405,541	590,326	651,030	760,411	827,011	874,938	831,680	642,114	531,914	381,550	306,628	7,164,975
Iron Springs QF	632,002	658,831	891,849	1,009,544	1,120,621	1,275,729	1,327,770	1,315,306	997,925	810,834	574,379	495,857	11,110,648
Latigo Wind QF	1,001,227	919,869	1,128,019	887,991	857,816	756,256	653,785	563,309	626,185	797,001	715,569	745,340	9,952,364
Mountain Wind 1 QF	1,397,906	1,038,926	881,867	687,035	478,109	504,295	417,864	425,509	469,765	681,945	912,095	1,078,321	8,973,637
Mountain Wind 2 QF	2,038,828	1,557,980	1,360,788	1,070,765	748,092	910,931	781,932	700,590	777,806	1,020,860	1,413,964	1,602,980	13,985,518
North Point Wind QF	1,119,374	1,887,863	1,762,544	1,863,861	1,131,008	1,268,824	1,538,820	1,523,257	1,848,717	1,787,346	1,924,728	1,878,455	19,534,795
Oregon Wind Farm QF	721,493	964,976	1,121,079	1,303,960	1,245,235	1,245,980	1,240,389	1,116,721	925,235	731,668	795,437	1,020,460	12,432,632
Pavant II Solar QF	201,314	255,660	379,339	434,447	514,699	570,761	649,719	654,766	487,627	364,198	240,997	196,180	4,949,705
Pioneer Wind 1 QF	1,307,719	925,080	1,302,648	1,021,708	676,800	737,081	856,229	825,193	541,890	866,588	1,349,151	1,085,602	11,495,689
Power County North Wind QF	431,502	570,443	549,212	536,482	373,560	365,543	386,891	379,427	392,483	533,545	543,645	627,035	5,689,769
Power County South Wind QF	381,111	502,335	496,004	498,085	323,108	325,843	342,613	353,598	347,429	467,178	490,511	543,731	5,071,546
Roseburg Dillard QF	44,544	51,457	27,164	104,964	107,166	90,090	245,085	171,264	73,254	75,375	76,026	64,172	1,130,551
Sage I Solar QF	80,192	79,413	189,005	204,759	233,577	261,123	333,738	333,817	207,287	154,769	104,237	74,940	2,256,858
Sage II Solar QF	80,277	79,507	189,206	204,979	233,789	261,418	334,094	334,188	207,523	154,927	104,366	75,010	2,259,284
Sage III Solar QF	67,598	66,161	156,107	166,890	191,458	213,576	272,357	272,300	171,079	129,834	88,345	63,665	1,859,270
Spanish Fork Wind 2 QF	222,450	179,011	207,228	163,645	154,892	217,017	287,456	318,786	275,436	245,056	255,132	261,068	2,787,179
Sunnyside QF	2,381,788	2,222,745	2,546,914	2,217,306	2,795,181	2,803,574	3,015,993	3,003,249	2,782,074	2,472,647	2,766,511	2,567,891	31,575,874
Sweetwater Solar QF	257,166	371,747	562,484	683,975	807,848	977,679	1,106,980	1,036,167	809,399	623,027	297,691	200,503	7,734,666
Tesoro QF	55,044	40,823	32,699	22,874	32,507	8,826	12,237	21,352	10,912	9,331	12,344	56,885	315,834
Three Peaks Solar QF	412,887	472,797	625,440	830,253	853,852	908,370	1,029,086	1,000,023	790,900	669,141	442,886	370,096	8,405,732
Threemile Canyon Wind QF	-	-	-	-	-	-	-	-	-	-	-	-	-
Utah Pavant Solar QF	241,761	277,105	474,572	555,307	656,455	732,080	849,723	809,453	675,540	507,862	322,448	266,427	6,368,732
Utah Red Hills Solar QF	484,702	615,593	784,787	1,023,184	1,185,775	1,224,261	1,478,356	1,442,811	1,301,276	803,875	586,211	461,634	11,392,463
Qualifying Facilities Total	\$ 22,806,832	\$ 24,081,715	\$ 28,578,260	\$ 30,224,434	\$ 30,038,075	\$ 31,622,272	\$ 34,642,439	\$ 33,483,558	\$ 29,097,599	\$ 26,064,433	\$ 23,728,127	\$ 22,045,618	\$ 336,413,361
Mid-Columbia Contracts													
Grant - Priest Rapids	\$ 184,760	\$ 184,760	\$ 184,760	\$ 184,760	\$ 184,760	\$ 184,760	\$ 184,760	\$ 184,760	\$ 184,760	\$ 184,760	\$ 184,760	\$ 184,760	\$ 2,217,125
Grant Reasonable	(79,720)	(79,720)	(79,720)	(79,720)	(79,720)	(79,720)	(79,720)	(79,720)	(79,720)	(79,720)	(79,720)	(79,720)	(956,639)
Grant Surplus	-	-	-	-	-	-	-	-	-	-	-	-	-
Mid-Columbia Contracts Total	\$ 105,040	\$ 105,040	\$ 105,040	\$ 105,040	\$ 105,040	\$ 105,040	\$ 105,040	\$ 105,040	\$ 105,040	\$ 105,040	\$ 105,040	\$ 105,040	\$ 1,260,486
Total Long Term Firm Purchases	\$ 40,940,806	\$ 39,671,179	\$ 47,005,253	\$ 46,904,016	\$ 46,350,008	\$ 47,455,337	\$ 49,671,861	\$ 48,487,991	\$ 44,419,934	\$ 42,710,499	\$ 41,158,656	\$ 40,305,508	\$ 535,081,050
Storage & Exchange													
APS Exchange	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cowlitz Swift	-	-	-	-	-	-	-	-	-	-	-	-	-
PSCo Exchange	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	450,000	-	-	4,500,000
SCL State Line	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Storage & Exchange	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ -	\$ -	\$ 4,500,000
Total Short Term Firm Purchases	\$ 14,207,168	\$ 11,297,536	\$ 15,244,811	\$ 1,475,235	\$ 11,367,923	\$ 18,258,063	\$ 40,294,181	\$ 40,527,382	\$ 20,075,416	\$ 11,110,339	\$ 10,435,965	\$ 17,472,291	\$ 211,766,311
Total Secondary Purchases	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Purchased Power & Net Interchange	\$ 55,597,974	\$ 51,418,716	\$ 62,700,064	\$ 48,829,251	\$ 58,167,932	\$ 66,163,400	\$ 90,416,042	\$ 89,465,374	\$ 64,945,351	\$ 54,270,839	\$ 51,594,620	\$ 57,777,799	\$ 751,347,361
Wheeling & U. of F. Expense													
Firm Wheeling	\$ 13,473,441	\$ 13,255,570	\$ 13,526,678	\$ 13,310,416	\$ 12,006,585	\$ 12,843,394	\$ 13,470,943	\$ 13,547,418	\$ 12,562,964	\$ 13,005,692	\$ 12,789,218	\$ 13,456,061	\$ 157,248,382
Non-Firm Wheeling	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Wheeling & U. of F. Expense	\$ 13,473,441	\$ 13,255,570	\$ 13,526,678	\$ 13,310,416	\$ 12,006,585	\$ 12,843,394	\$ 13,470,943	\$ 13,547,418	\$ 12,562,964	\$ 13,005,692	\$ 12,789,218	\$ 13,456,061	\$ 157,248,382

California ECAC 2022 Projected Net Power Cost

Exhibit PAC/104

Jan-22

Feb-22

Mar-22

Apr-22

May-22

Jun-22

Jul-22

Aug-22

Sep-22

Oct-22

Nov-22

Dec-22

Total 2022

California ECAC 2022 Projected Net Power Cost

Exhibit PAC/104

	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total 2022
Coal Fuel Burn Expense													
Cholla	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Colstrip	1,924,390	1,737,016	1,898,331	1,745,153	1,256,369	1,270,072	1,450,999	1,585,851	1,418,210	909,088	1,000,147	1,325,256	17,520,880
Craig	1,972,429	1,681,651	1,791,507	1,426,816	787,302	946,517	1,211,393	1,708,632	1,680,151	1,510,473	951,764	954,090	16,622,724
Dave Johnston	6,244,227	5,800,913	5,313,272	5,925,294	4,957,026	3,445,268	3,543,208	4,341,367	3,973,537	4,115,342	3,516,487	4,177,866	55,353,808
Hayden	1,146,680	982,155	1,018,610	891,926	1,186,879	1,216,940	1,197,792	1,014,662	734,955	1,054,744	897,664	840,460	12,183,468
Hunter	14,242,390	11,604,768	10,818,857	4,956,263	7,651,749	7,783,418	9,900,506	10,134,903	10,053,593	9,874,554	10,775,437	10,916,671	118,713,109
Huntington	12,464,096	9,832,927	9,396,515	6,169,200	5,006,439	7,028,722	9,928,233	9,608,512	8,201,702	7,531,738	8,617,774	10,718,723	104,504,580
Jim Bridger	12,782,905	13,790,009	12,829,590	11,034,165	11,481,792	15,665,919	21,327,116	21,244,615	18,003,961	18,310,193	17,985,605	18,160,501	192,616,372
Naughton	3,045,518	2,284,803	2,237,301	1,604,055	1,426,768	1,716,995	2,977,599	2,909,323	2,624,272	2,490,899	2,278,064	2,698,147	28,293,745
Wyodak	2,397,595	2,386,654	2,559,800	2,536,406	2,674,092	1,971,847	2,525,610	2,445,262	2,230,813	2,196,131	1,532,725	1,245,325	26,702,259
Total Coal Fuel Burn Expense	\$ 56,220,230	\$ 50,100,897	\$ 47,863,782	\$ 36,289,277	\$ 36,428,416	\$ 41,045,699	\$ 54,062,455	\$ 54,993,127	\$ 48,921,193	\$ 47,993,161	\$ 47,555,668	\$ 51,037,040	\$ 572,510,944
Gas Fuel Burn Expense													
Chehalis	\$ 7,359,642	\$ 3,071,017	\$ 1,101,710	\$ 5,194,097	\$ 3,104,944	\$ 2,546,232	\$ 4,771,113	\$ 4,410,756	\$ 4,690,778	\$ 5,910,531	\$ 4,939,573	\$ 5,511,283	\$ 52,611,675
Current Creek	6,157,677	6,566,264	1,015,992	4,113,328	3,734,811	5,150,549	6,328,128	4,466,604	4,254,643	5,107,662	6,643,809	4,823,419	58,362,884
Gadsby	585,035	428,919	289,139	226,962	267,842	580,086	1,031,781	1,205,189	972,013	651,814	639,440	1,127,529	8,005,750
Gadsby CT	356,442	154,349	56,442	61,267	57,145	392,515	767,272	784,064	656,618	627,937	521,091	931,665	5,366,805
Hermiston	4,113,470	3,166,919	3,216,589	2,022,663	1,170,034	636,465	2,368,690	2,097,008	2,269,290	1,621,185	1,959,535	2,411,073	27,052,921
Lake Side 1	6,211,054	4,970,208	6,815,801	5,913,363	3,909,059	4,159,110	6,929,215	7,004,352	6,013,533	6,260,860	6,186,220	5,295,775	69,668,552
Lake Side 2	4,388,985	2,678,923	1,460,995	1,114,459	2,053,428	3,444,266	4,179,974	4,333,825	3,930,813	4,326,560	4,289,185	5,419,826	41,621,239
Naughton - Gas	886,268	780,359	243,996	282,817	590,074	916,175	2,192,451	2,140,542	1,325,374	1,556,842	1,104,889	2,744,006	14,763,793
Total Gas Fuel Burn Expense	\$ 30,058,572	\$ 21,816,958	\$ 14,200,664	\$ 18,928,956	\$ 14,887,337	\$ 17,825,397	\$ 28,568,623	\$ 26,442,340	\$ 24,113,062	\$ 26,063,392	\$ 26,283,742	\$ 28,264,575	\$ 277,453,618
Other Generation													
Black Cap Solar	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Blundell	666,076	601,617	601,617	603,311	614,861	579,403	554,672	576,700	589,628	585,218	338,058	374,256	6,685,418
Total Other Generation	\$ 666,076	\$ 601,617	\$ 601,617	\$ 603,311	\$ 614,861	\$ 579,403	\$ 554,672	\$ 576,700	\$ 589,628	\$ 585,218	\$ 338,058	\$ 374,256	\$ 6,685,418
Net Power Cost	\$ 120,757,460	\$ 115,484,935	\$ 112,721,712	\$ 102,571,919	\$ 107,184,318	\$ 117,102,895	\$ 155,135,510	\$ 147,588,923	\$ 117,226,638	\$ 115,822,856	\$ 117,122,942	\$ 132,235,958	\$ 1,460,956,065

Application No. 21-08-_____
Exhibit No. PAC/105
Witness: Douglas R. Staples

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

2022 California-allocated Net Power Costs

August 2, 2021

Exhibit PAC/105
PacifiCorp
August 2, 2021
California ECAC 2022 Projected Net Power Cost

Description	CY 2022 Total Company	Per Docket A.18-04-002		CY 2022 California Allocated
		2017 Protocol Factor	California Factor %	
Sales for Resale (Account 447)				
Existing Firm Sales PPL	7,750,540	SG	1.580%	122,492
Existing Firm Sales UPL	-	SG	1.580%	-
Post-merger Firm Sales	296,539,117	SG	1.580%	4,686,606
Total Revenue	304,289,657			4,809,099
	-			
Purchased Power (Account 555)				
Existing Firm Demand PPL	8,474,963	SG	1.580%	133,941
Existing Firm Demand UPL	13,322,012	SG	1.580%	210,546
Existing Firm Energy	47,739,069	SE	1.490%	711,444
Post-merger Firm	681,811,317	SG	1.580%	10,775,581
Other Generation	-	SG	1.580%	-
Seasonal Contracts	-	SG	1.580%	-
Total Purchased Power	751,347,361			11,831,512
	-			
Wheeling (Account 565)				
Existing Firm PPL	23,949,309	SG	1.580%	378,503
Existing Firm UPL	-	SG	1.580%	-
Post-merger Firm	116,755,331	SG	1.580%	1,845,241
Non-firm	16,543,742	SE	1.490%	246,547
Total Wheeling Expense	157,248,382			2,470,292
	-			
Fuel Expense (Accounts 501, 503 and 547)				
Fuel Consumed - Coal	572,510,944	SE	1.490%	8,531,995
Fuel Consumed - Gas	6,987,003	SE	1.490%	104,126
Steam From Other Sources	6,685,418	SE	1.490%	99,631
Natural Gas Consumed	265,844,796	SE	1.490%	3,961,822
Simple Cycle Combustion Turbines	4,621,819	SE	1.490%	68,878
Cholla/APS Exchange	-	SE	1.490%	-
Total Fuel Expense	856,649,980			12,766,452
	-			
CY 2022 Net Power Cost	1,460,956,065			22,259,157

Application No. 21-08-_____
Exhibit No. PAC/106
Witness: Douglas R. Staples

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

ARB Administrative Costs

CONFIDENTIAL

August 2, 2021

CONFIDENTIAL Exhibit PAC/106
PacifiCorp
August 2, 2021
California Air Resources Boards
Administrative Costs⁽¹⁾

CONFIDENTIAL INFORMATION IS SHADED

	<u>2020</u> <u>Forecast</u>	<u>2020</u> <u>Actual</u>	<u>2021</u> <u>Forecast</u>	<u>2021</u> <u>Forecast/Actual</u>	<u>2022</u> <u>Forecast</u>
CARB Implementation Fees					
Mandatory Reporting Verification Costs					
Total Administrative Costs ⁽¹⁾	\$ <u>47,845</u>	\$ <u>58,897</u>	\$ <u>82,419</u>	\$ <u>93,695</u>	\$ <u>46,189</u>

⁽¹⁾ Excludes etimated emission obligation cost from the purchase of allowances and forecast revenue from the sale of directly allocated allowances. On August 1, 2013 PacifiCorp filed a separate application forecasting the costs from the purchase of allowances and revenue from the sale of allowances.

Application No. 21-08-_____
Exhibit No. PAC/200 - 209
Witness: Mary M. Wiencke

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Direct Testimony of Mary M. Wiencke

PUBLIC VERSION

August 2, 2021

Table of Contents

I.	Witness Qualifications	1
II.	Summary of Testimony.....	1
III.	Forecast and Actual 2019 and 2020 GHG Allowance Costs	3
IV.	Forecast 2021 and 2022 GHG Allowance Costs	5
V.	Forecast and Actual 2020 GHG Allowance Revenue.....	7
VI.	2021 and 2022 Forecast GHG Allowance Revenue	8

Attached Exhibits

Confidential Exhibit PAC/201 – Commission Template C Weighted Average Cost of Compliance Instruments

Confidential Exhibit PAC/202 – Commission Template D-2 Annual GHG Emissions and Associated Compliance Obligation

Confidential Exhibit PAC/203 – Summary of the GHG Allowance Costs Sub-Balancing Account

Confidential Exhibit PAC/204 – 2022 Forecast Compliance Obligation and GHG Allowance Costs

Confidential Exhibit PAC/ 205 – 2020 Recorded GHG Allowance Revenue

Confidential Exhibit PAC/206 – 2021 Recorded/Forecast GHG Allowance Revenue

Confidential Exhibit PAC/207 – Summary of the GHG Allowance Revenue Balancing Account

Confidential Exhibit PAC/208 – 2022 Forecast GHG Allowance Revenue

Confidential Exhibit PAC/209 – Commission Template D-5 History of Revenues, Costs, and Emissions Intensity

I. Witness Qualifications

1
2 **Q. Please state your name, business address, and present position with PacifiCorp**
3 **d/b/a Pacific Power (PacifiCorp or Company).**

4 A. My name is Mary M. Wiencke. My business address is 825 NE Multnomah Street,
5 Suite 2000, Portland, Oregon 97232. I am employed by PacifiCorp as Vice President
6 of Market, Regulation, and Transmission Policy.

7 **Q. Please describe your education and business experience.**

8 A. I have a Bachelor of Arts degree in Environmental Science from Barnard College and
9 a J.D. from Lewis & Clark Law School. I have been employed by PacifiCorp for 13
10 years in various positions of responsibility in both legal and policy roles.

11 **Q. Please explain your responsibilities as PacifiCorp's Vice President of Market,**
12 **Regulation, and Transmission Policy.**

13 A. My current responsibilities include developing PacifiCorp's environmental policy,
14 strategy, and programs as well as ensuring compliance for Company-wide renewable
15 portfolio standards (RPS), reporting of greenhouse gas (GHG) emissions for
16 California, Oregon, and Washington, and overseeing environmental commodity
17 transactions. Most relevant to this application, I manage PacifiCorp's compliance
18 with the California Air Resources Board (ARB) Mandatory Reporting Regulation and
19 Cap and Trade Program.

20 **II. Summary of Testimony**

21 **Q. Please summarize your direct testimony.**

22 A. My direct testimony: (1) reconciles PacifiCorp's forecast GHG allowance costs and
23 revenues set out in the Company's 2021 Energy Cost Adjustment Clause (ECAC) and

1 GHG Application (A.20-08-002) (2021 Application) with actual GHG allowance
2 costs and revenues through May 31, 2021; and (2) forecasts PacifiCorp's GHG
3 allowance costs and revenues for the remainder of 2021 and 2022. PacifiCorp's
4 forecast of 2021 GHG allowance costs and revenues will be reconciled next year in
5 the 2023 ECAC and GHG Application. The 2023 Application will also include a
6 final reconciliation of 2020 GHG allowance costs based on ARB's 2020 verified
7 emissions data report.¹

8 **Q. Please describe the exhibits provided in support of your direct testimony.**

9 **A.** I prepared nine exhibits in support of my direct testimony.

- 10 • Confidential Exhibit PAC/201 – California Public Utilities Commission
11 (Commission) Template C Weighted Average Cost of Compliance Instruments.
12 This exhibit provides the Company's monthly accrued compliance obligation
13 based on the weighted average cost methodology prescribed by the Commission.
14 This template was developed by the Commission and modified in (D) 19-04-016
15 on April 25, 2020. *See* Decisions (D.) 14-10-033, D.14-10-055, D.15-01-024, and
16 D.15-04-016.
- 17 • Confidential Exhibit PAC/202 – Commission Template D-2 Annual GHG
18 Emissions and Associated Compliance Obligation. This exhibit provides annual
19 forecast and actual compliance obligation by year in metric tons carbon dioxide
20 equivalent (MTCO₂e) and dollars. This template was developed by the
21 Commission. *See* D.14-10-033, D.14-10-055, and D.15-01-024.
- 22 • Confidential Exhibit PAC/203 – Summary of the GHG Allowance Costs Sub-
23 Balancing Account. This exhibit provides a reconciliation of the balance in the
24 GHG Allowance Costs Sub-Balancing Account and shows whether there is an
25 over-collection or under-collection from customers that is included in the
26 calculation of the GHG allowance costs recovered from customers.
- 27 • Confidential Exhibit PAC/204 – 2022 Forecast Compliance Obligation and GHG
28 Allowance Costs. This exhibit calculates the Company's 2022 forecasted
29 monthly GHG compliance cost based on a proxy price.

¹ ARB is expected to issue its 2020 Verified Emissions Report by August 15, 2021.

- 1 • Confidential Exhibit PAC/205 – 2020 Recorded GHG Allowance Revenue. This
2 exhibit summarizes the GHG allowances sold in 2020 at the ARB quarterly
3 auctions.
- 4 • Confidential Exhibit PAC/206 – 2021 Recorded/Forecast GHG Allowance
5 Revenue. This exhibit summarizes the GHG allowances sold at the ARB
6 quarterly auctions through May 31, 2021 and the amount (if any) forecast to be
7 sold during the remainder of the year.
- 8 • Confidential Exhibit PAC/207 – Summary of the GHG Allowance Revenue
9 Balancing Account. This exhibit provides a reconciliation of the balance in the
10 GHG Allowance Revenue Balancing Account and shows the remaining balance to
11 be returned to customers in 2021.
- 12 • Confidential Exhibit PAC/208 – 2022 Forecast GHG Allowance Revenue. This
13 exhibit calculates the Company's 2022 forecast GHG allowance revenue from the
14 ARB quarterly auctions based on a proxy price.
- 15 • Confidential Exhibit PAC/209 – Commission Template D-5 History and Forecast
16 of Revenue, Costs, and Emissions Intensity. This exhibit summarizes the forecast
17 and recorded GHG allowance costs and revenues over the program years. This
18 template was developed by the Commission. *See* D.14-10-033, D.14-10-055, and
19 D.15-01-024.
20

21 **III. Forecast and Actual 2019 and 2020 GHG Allowance Costs**

22 **Q. Please describe the types of GHG compliance costs PacifiCorp has incurred and**
23 **is forecasted to incur.**

24 **A.** PacifiCorp is subject to regulation as a first jurisdictional deliverer of electricity into
25 California under ARB's GIIG cap-and-trade program. As a first jurisdictional
26 deliverer, PacifiCorp must surrender to ARB one GHG compliance instrument (i.e., a
27 GHG allowance or offset credit) for each metric ton of carbon dioxide emitted or its
28 equivalent. At this time, PacifiCorp only has direct GHG costs (i.e., the costs
29 associated with procuring GHG allowances). PacifiCorp has not incurred, and does
30 not expect to incur, any indirect GHG costs (e.g., the embedded GHG compliance

1 costs associated with electricity procured in the wholesale market) as part of its retail
2 compliance obligation.

3 **Q. What were PacifiCorp's actual final GHG allowance costs for 2019?**

4 A. On November 4, 2020, ARB issued its 2019 Verified Emissions Report. Based on
5 PacifiCorp's 2019 Verified Emissions Report, the actual final cost of PacifiCorp's
6 GHG compliance obligation for 2019 is [Begin Confidential] [REDACTED] [End
7 Confidential].² The Company's 2019 actual retail compliance obligation was [Begin
8 Confidential] [REDACTED] [End Confidential] allowances. See Confidential Exhibits
9 PAC/201 and PAC/202. The actual final cost for 2019 is included in the
10 reconciliation of the balance in the GHG Allowance Costs Sub-Balancing Account as
11 shown in Confidential Exhibit PAC/203.

12 **Q. What were PacifiCorp's forecast and actual GHG allowance costs for 2020?**

13 A. In its 2021 GHG Application, PacifiCorp forecasted that it would incur [Begin
14 Confidential] [REDACTED] [End Confidential] for 2020 GHG allowance costs. See
15 Confidential Exhibit PAC/202 in the Company's 2021 Application, and Confidential
16 Exhibit PAC/202 in this application. As of May 31, 2021, PacifiCorp has accrued
17 [Begin Confidential] [REDACTED] [End Confidential] for 2020 GHG allowance costs in
18 the GHG Allowance Costs Sub-Balancing Account. There will be a final true-up to
19 the verified 2020 GHG allowance costs in the Company's next application filed on
20 August 1, 2022 based on the 2020 Verified Emissions Report.

²All references to GHG allowance costs are based on the weighted average cost methodology prescribed by the Commission and calculated as shown in Confidential Exhibit PAC/201.

1 **IV. Forecast 2021 and 2022 GHG Allowance Costs**

2 **Q. What did PacifiCorp forecast for 2021 GHG allowance costs in its 2021**

3 **Application?**

4 A. In its 2021 Application, PacifiCorp forecasted the Company would incur [Begin
5 Confidential] [REDACTED] [End Confidential] for GHG Allowance Costs in 2021. *See*
6 Confidential Exhibits PAC/202 and PAC/204 in the Company's 2021 Application and
7 Confidential Exhibit PAC/202 in this application.

8 **Q. Has PacifiCorp updated its forecast for 2021 GHG allowance costs in its this**

9 **Application?**

10 A. Yes. Through May 31, 2021, PacifiCorp has accrued [Begin Confidential]
11 [REDACTED] [End Confidential] for its 2021 compliance obligation in the GHG
12 Allowance Costs Sub-Balancing Account. PacifiCorp forecasts that it will incur
13 additional GHG allowance costs of [Begin Confidential] [REDACTED] [End
14 Confidential] from June 1, 2021, through the remainder of the year, December 31,
15 2021. Based on the amount accrued to date and the forecast for the remainder of the
16 year, the updated forecast GHG allowance costs for 2021 are [Begin Confidential]
17 [REDACTED] [End Confidential]. *See* Confidential Exhibit PAC/203 in this application.

18 **Q. What proxy price was used to calculate the Company's forecast compliance**
19 **obligation for June 1, 2021 through December 31, 2021?**

20 A. The Company used the March 31, 2021 forward Intercontinental Exchange (ICE)
21 settlement price of \$18.51 as the GHG allowance proxy price to calculate the
22 Company's forecast compliance costs for June 1, 2021 through December 31, 2021.
23 *See* Confidential Exhibit PAC/201. The process for calculating the Company's 2021

1 compliance obligation is described in more detail below.

2 **Q. What GHG allowance costs does PacifiCorp forecast for 2022?**

3 A. The 2022 GHG allowance costs are forecast to be [Begin Confidential] [REDACTED]
4 [End Confidential]. Refer to Confidential Exhibit PAC/204 for the 2022 forecast
5 compliance obligation and GHG allowance costs.

6 **Q. What methodology was used to forecast PacifiCorp's 2022 GHG allowance
7 costs?**

8 A. As a multi-jurisdictional retail provider that has a GHG compliance obligation,
9 PacifiCorp must calculate emissions as set out in California Code of Regulations,
10 Section 95111. PacifiCorp's calculation of GHG allowance costs is consistent with
11 D.14-10-033 issued October 16, 2014 and uses the straightforward methodology of
12 multiplying its compliance obligation by the GHG allowance proxy price.
13 PacifiCorp's compliance obligation was developed using data consistent with
14 PacifiCorp's system generation mix forecast and California load forecast assumptions
15 in PacifiCorp's 2022 ECAC included with this application. *See* the direct testimony
16 and exhibits of Mr. Douglas R. Staples in support of the Company's ECAC provided
17 as Exhibits PAC/100 through Confidential Exhibit PAC/106. Allowance costs for
18 2021 are based on the Company's accrued compliance obligation through May 31,
19 2021, plus the forecast compliance obligation from June 2021 through December
20 2021 multiplied by the GHG allowance proxy price. Allowance costs for 2022 are
21 based on a forecast of the Company's compliance obligation for 2022 multiplied by
22 the GHG allowance proxy price. *See* Confidential Exhibits PAC/201 and PAC/204.

23 **Q. How was the 2022 proxy price developed?**

1 A. The GHG allowance proxy price forecast of \$19.36 for 2022 was developed in
2 accordance with D.14-10-033. PacifiCorp uses a GHG allowance proxy price based
3 on the forward ICE settlement price for GHG allowances with December delivery of
4 the forecast year 2022, consistent with the methodology used to calculate forward
5 prices for other commodities in its ECAC application. *See* Confidential Exhibit
6 PAC/204 for the 2022 forecast GHG allowance costs.

7 **Q. Has the Company prepared an exhibit summarizing the balance in the GHG**
8 **Allowance Costs Sub-Balancing Account?**

9 A. Yes. A summary of the balance in the GHG Allowance Costs Sub-Balancing
10 Account is shown in Confidential Exhibit PAC/203. The summary shows a projected
11 [Begin Confidential] [REDACTED] [End Confidential] of GHG
12 allowance costs at the end of 2021.

13 **Q. Will the balance in the GHG Allowance Costs Sub-Balancing Account be**
14 **considered in the calculation of the GHG allowance costs to be recovered in rates**
15 **in 2022?**

16 A. Yes. *See* the testimony of Company witness Ms. Judith M. Ridenour, Exhibit
17 PAC/600, and accompanying Exhibit PAC/602.

18 **V. Forecast and Actual 2020 GHG Allowance Revenue**

19 **Q. What were PacifiCorp's forecast GHG allowance revenues for 2020?**

20 A. In its 2021 Application, PacifiCorp forecast \$12,604,291 in GHG allowance revenues
21 for 2020. *See* 2021 Application, Confidential Exhibit PAC/206.

22 **Q. What were PacifiCorp's actual GHG allowance revenues in 2020?**

23 A. PacifiCorp's total actual GHG allowance revenues in 2020 were \$13,082,153. *See*

1 Confidential Exhibit PAC/205. The actual 2020 GHG allowance revenue has been
2 included in the reconciliation of the balance in the GHG Allowance Revenue
3 Balancing Account as shown on Confidential Exhibit PAC/207 and Confidential
4 Exhibit PAC/605 to the direct testimony of Ms. Judith M. Ridenour.

5 **VI. 2021 and 2022 Forecast GHG Allowance Revenue**

6 **Q. What are the total 2021 and 2022 forecast GHG allowance revenue?**

7 A. Forecast 2021 GHG allowance revenue is \$10,116,732. Forecast 2022 GHG
8 allowance revenue is \$10,661,475. See Confidential Exhibits PAC/206 and
9 PAC/208, respectively.

10 **Q. What methodology was used to forecast 2021 and 2022 GHG allowance revenue?**

11 A. PacifiCorp calculated its forecast GHG allowance revenue by multiplying its annual
12 allowance allocation from ARB times the GHG allowance proxy price. PacifiCorp's
13 2021 forecast GHG allowance revenue is based on actual GHG allowance revenue
14 received from the 2021 quarterly allowance auctions as of May 31, 2021, and the
15 expected revenue from the sale of GHG allowances PacifiCorp expects to consign to
16 the remaining 2021 ARB auctions, multiplied by the GHG allowance proxy price.

17 The Company has assumed that it will submit and sell 100 percent of its 2021
18 allowance allocation from ARB at auctions in 2021, less allowances administratively
19 retired by ARB to account for Energy Imbalance Market (EIM) Purchaser
20 Emissions.³ For calendar year 2022, the forecast is based on the expected revenue
21 from the sale of the GHG allowances PacifiCorp expects to consign to the 2022 ARB

³ PacifiCorp does not currently have a way to forecast EIM Purchaser Emissions; however, the amount is expected to be relatively small.

1 auctions multiplied by forecasted GHG allowance proxy price for 2022. *See*
2 Confidential Exhibits PAC/206 and PAC/208.

3 **Q. What GHG allowance proxy price was used to determine forecast GHG**
4 **allowance revenues in 2021 and 2022?**

5 A. The GHG allowance proxy prices for 2021 and 2022 are \$18.51 and \$19.36,
6 respectively. Please refer to Section IV of my testimony for a more detailed
7 discussion about the methodology used to develop the proxy prices for each year.
8 The Company used the same proxy prices for determining both forecast GHG
9 allowance costs and GHG allowance revenue in 2021 and 2022.

10 **Q. Did you have any concerns regarding the proxy prices used to determine the**
11 **forecast GHG allowances costs and GHG allowance revenue for 2020 and 2021**
12 **in the 2021 Application A.20-08-002?**

13 A. Yes. In the 2021 Application, PacifiCorp used the ICE proxy price as required by
14 D.14-10-033. However, the ICE proxy prices for 2020 and 2021 were below the 2020
15 and 2021 auction floor price of \$16.68 and \$17.71, respectively.

16 **Q. Were the GHG costs and revenue forecasts understated because of the proxy**
17 **prices used in the 2021 Application?**

18 A. Yes. The GHG allowance costs were [Begin Confidential] [REDACTED]
19 \$ [REDACTED] [End Confidential] and revenues under stated by \$2,015,253. This
20 deviation was largely driven by the proxy price misalignment. *See* Confidential
21 Exhibits PAC/203 and PAC/207. The understatement of revenues is solely driven by
22 the proxy price misalignment because the number of allowances directly allocated to
23 PacifiCorp is known in advance. For the under collection of costs, approximately \$1

1 million is due to the difference between the forecast and actual obligation with the
2 balance attributable to the proxy price misalignment.

3 **Q. Were all of PacifiCorp's consigned allowances sold in the February 2021 and**
4 **May 2021 auctions?**

5 A. Yes.

6 **Q. Has the Company prepared an exhibit summarizing the balance in the GHG**
7 **Allowance Revenue Balancing Account?**

8 A. Yes. A summary of the GHG Allowance Revenue Balancing Account is shown in
9 Confidential Exhibit PAC/207. The summary shows a projected balance of
10 \$2,015,253 at the end of 2021 which represents less GHG allowance revenue returned
11 to eligible customers than what was available to return to customers.

12 **Q. Will the balance in the GHG Allowance Revenue Balancing Account be included**
13 **in the GHG allowance revenue to be distributed through the California Climate**
14 **Credit in 2022?**

15 A. Yes. See the testimony of Company witness Ms. Judith M. Ridenour, Exhibit
16 PAC/600, and accompanying Exhibit PAC/603.

17 **Q. Does this conclude your direct testimony?**

18 A. Yes.

Application No. 21-08-_____
Exhibit No. PAC/201
Witness: Mary M. Wiencke

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

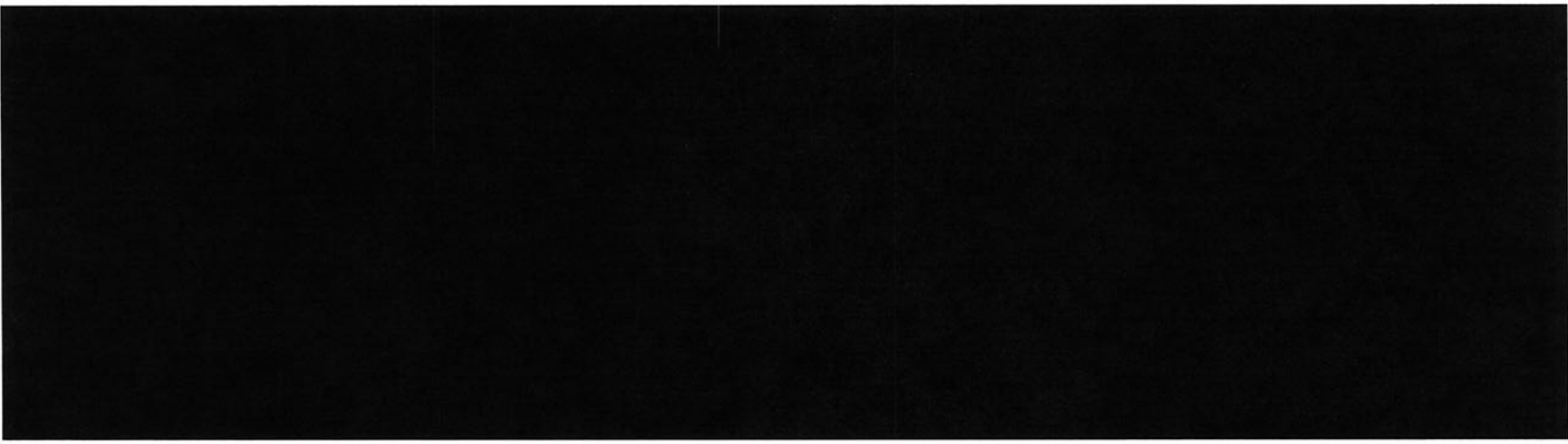
Commission Template C Weighted Average Cost of Compliance Instruments

CONFIDENTIAL

August 2, 2021

[illegible]

May-19
Jun-19
Jul-19
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Oct-19
Nov-19
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Mar-20
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Dec-21



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Application No. 21-08-_____
Exhibit No. PAC/202
Witness: Mary M. Wiencke

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Commission Template D-2 Annual GHG Emissions and Associated Compliance Obligation

CONFIDENTIAL

August 2, 2021

CONFIDENTIAL
 Exhibit PAC/202
 PacificCorp
 Commission Template D-2
 Annual GHG Emissions and Associated Compliance Obligation
 August 2, 2021

Line	Description	2013		2014		2015		2016		2017		2018		2019		2020		2021		2022	
		Forecast	Recorded (Note 1)	Forecast	Recorded (Note 1)	Forecast	Recorded (Note 1)	Forecast	Recorded (Note 1)	Forecast	Recorded (Note 1)	Forecast	Recorded (Note 1)	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO ₂ e)																				
2	Utility Owned Generation (UOG)																				
3	Tolling Agreements																				
4	Energy Imports (Specified)																				
5	Energy Imports (Unspecified)																				
6	Qualifying Facility (QF) Contracts																				
7	MURP Compliance Obligation (Note 2)																				
8	Subtotal																				
9	Indirect GHG Emissions (MTCO ₂ e)																				
10	In-state Market Purchases																				
11	Contract Purchases																				
12	Subtotal																				
13	Total Emissions (MTCO ₂ e) (Note 3)																				
14	Weighted Average Cost of Compliance Instrument Inventory (\$/MT)																				
15	Proxy GHG Price (\$/MT)	-	-	-	-	2.26	-	13.08	-	13.81	-	15.27	-	16.80	-	15.65	-	16.47	-	19.36	-
16	GHG Costs (\$)																				
17	Direct GHG Costs																				
18	Indirect GHG Costs																				
19	Previous Year's Forecast Reconciliation (Line 21)	N/A	N/A																		
20	Total Costs (\$)																				
21	Forecast Variance (\$)	N/A		N/A		N/A		N/A		N/A		N/A		N/A		N/A		N/A		N/A	

Notes:

- 1/ Recorded costs in years between 2013 to 2021 represent the accrued total emissions at the weighted average cost on Exhibit PAC/201.
- 2/ The actual Multi-Jurisdictional Retail Provider (MURP) Compliance Obligation for each year is not known until September of the following year. Under the Mandatory Reporting Rule Regulation, PacificCorp reports emissions associated with using its retail load based on a unique formula. As such, PacificCorp has revised the table to include a new section under "Direct GHG Emissions" for PacificCorp to report its MURP Compliance Obligation on Line 7.
- 3/ PacificCorp only has direct emissions and therefore this information is considered confidential.

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Application No. 21-08-_____
Exhibit No. PAC/203
Witness: Mary M. Wiencke

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Summary of the GHG Allowance Costs Sub-Balancing Account

CONFIDENTIAL

August 2, 2021

CONFIDENTIAL
Exhibit PAC/203
PacifiCorp
Summary of the GHG Allowance Costs Sub-Balancing Account
August 2, 2021

		GHG Allowance Costs Sub-Balancing Account		
Line No.	Description	Recorded-to- Date (as of 5/31/2021)	Estimated 6/1/20 - 12/31/21	Estimated 12/31/2021 Balance
1	GHG Allowance Costs			
2	2013			
3	Accrued Interest			
4	2014			
5	Accrued Interest			
6	2015			
7	Accrued Interest			
8	2016			
9	Accrued Interest			
10	2017			
11	Accrued Interest			
12	2018			
13	Accrued Interest			
14	2019			
15	Accrued Interest			
16	2020			
17	Accrued Interest			
18	2021			
19	Accrued Interest			
18	Gross up for Franchise Taxes and Bad Debt Expense ⁽¹⁾			
20	Subtotal Recorded/Forecast Costs			\$ 65,261,421
21	GHG Surcharge Collected from Customers			
	GHG Allowance Costs Sub-Balancing Account Under /			
22	(Over) Collection			

⁽¹⁾ Authorized factor of 98.1867565% applies from 2013 - 2018, and 97.977602% from 2019 forward

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Application No. 21-08-_____
Exhibit No. PAC/204
Witness: Mary M. Wiencke

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

2022 Forecast Compliance Obligation and GHG Allowance Cost

CONFIDENTIAL

August 2, 2021

CONFIDENTIAL
Exhibit PAC/204
PacifiCorp
2022 Forecast Compliance Obligation and GHG Allowance Costs
August 2, 2021

Line No.	Description	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Total
1	Compliance Obligation (1)													
2	Allowance Price (2)	\$19.36	\$19.36	\$19.36	\$19.36	\$19.36	\$19.36	\$19.36	\$19.36	\$19.36	\$19.36	\$19.36	\$19.36	\$19.36
3	Compliance Costs													

- (1) Volumes are in Metric Tons CO₂e. The compliance obligation was developed using data consistent with the system generation mix forecast and California load forecast assumptions in the 2022 ECAC filed as part of this application.
- (2) The Company used March 31, 2021 forward ICE settlement price for forecasted GHG allowances with December delivery of the forecast year consistent with forward prices for other commodities in its respective 2022 ECAC filed as part of this application.

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Application No. 21-08-_____
Exhibit No. PAC/205
Witness: Mary M. Wiencke

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

2020 Recorded GHG Allowance Revenue

CONFIDENTIAL

August 2, 2021

2020 Recorded GHG Allowance Revenue
August 2, 2021

Line No.	Description	Volume ⁽¹⁾	Price ⁽²⁾	Dollars
1	Auction Date:			
2	February 2020		\$17.87	
3	May 2020		\$16.68	
5	August 2020		\$16.68	
6	November 2020		\$16.93	
8	Total 2020	767,732		\$ (13,082,153)

⁽¹⁾ Volumes are in Metric Tons CO2e

⁽²⁾ Settled Price for the Auction

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Application No. 21-08-_____
Exhibit No. PAC/206
Witness: Mary M. Wiencke

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

2021 Recorded/Forecast GHG Allowance Revenue

CONFIDENTIAL

August 2, 2021

Exhibit PAC/206
PacifiCorp
2021 Recorded/Forecast GHG Allowance Revenue
August 2, 2021

Line No.	Description	Volume ⁽¹⁾	Price ⁽²⁾	Dollars
1	Auction Date:			
2	February 2021		\$17.80	
3	May 2021		\$18.80	
4	2021 Recorded			
5	August 2021		\$18.51	
6	November 2021		\$18.51	
7	2021 Forecast			
8	Total 2021	549,673		\$ (10,116,732)

⁽¹⁾ Volumes are in Metric Tons CO₂e

⁽²⁾ The Company used March 31, 2021 forward ICE settlement price for forecasted GHG allowances with December delivery of the forecast year consistent with forward prices for other commodities in its respective 2022 ECAC filed as part of this application.

CONFIDENTIAL INFORMATION IS SHADED

Application No. 21-08-_____
Exhibit No. PAC/207
Witness: Mary M. Wiencke

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Summary of the GHG Allowance Revenue Balancing Account

CONFIDENTIAL

August 2, 2021

CONFIDENTIAL
Exhibit PAC/207
PacifiCorp
Summary of the GHG Allowance Revenue Balancing Account
August 2, 2021

Line No.	Description	GHG Revenue Balancing Account			Source
		Recorded-to- Date (as of 5/31/2021)	Estimated 6/1/21 - 12/31/21	Estimated 12/31/21 Balance	
1	GHG Allowance Revenues:				
2	2013	\$ (9,096,948)		\$ (9,096,948)	See A.14-08-003 Confidential Exhibit PAC/104
3	Accrued Interest - 2013	\$ (10,510)		\$ (10,510)	
4	2014	\$ (8,518,840)		\$ (8,518,840)	See A.15-08-044 Confidential Exhibit PAC/205
5	Accrued Interest - 2014	\$ (6,331)		\$ (6,331)	
6	2015	\$ (9,085,917)		\$ (9,085,917)	See A.16-08-001 Confidential Exhibit PAC/205
7	Accrued Interest - 2015	\$ 224		\$ 224	
8	2016	\$ (9,387,611)		\$ (9,387,611)	See A.17-08-005 Confidential Exhibit PAC/205
9	Accrued Interest - 2016	\$ 4,365		\$ 4,365	
10	2017	\$ (10,681,011)		\$ (10,681,011)	See A.18-08-001 Confidential Exhibit PAC/205
11	Accrued Interest - 2017	\$ 9,052		\$ 9,052	
12	2018	\$ (11,216,803)		\$ (11,216,803)	See A.19-08-002 Confidential Exhibit PAC/205
13	Accrued Interest - 2018	\$ (28,545)		\$ (28,545)	
14	2019	\$ (12,783,641)		\$ (12,783,641)	See A.20-08-002 Confidential Exhibit PAC/205
15	Accrued Interest - 2019	\$ (55,368)		\$ (55,368)	
16	2020	\$ (13,082,153)		\$ (13,082,153)	Confidential Exhibit PAC/205
17	Accrued Interest - 2020	\$ (20,477)		\$ (20,477)	
18	2021			\$ (10,116,732)	Confidential Exhibit PAC/206
19	Accrued Interest - 2021			\$ (17,911)	
18	Gross up for Franchise Taxes and Bad Debt Expense ⁽¹⁾			\$ (1,781,629)	
20	Subtotal Recorded/Forecast Revenues			\$ (95,876,786)	
21	Recorded/Forecast Expenses:				
22	GHG Outreach and Education Costs - (2013 - 2021)	\$ 492,225	\$ 47,150	\$ 539,375	Exhibit PAC/301 Line 10
23	GHG Administrative Costs - (2013 - 2021)	\$ 38,620	\$ 4,010	\$ 42,630	Exhibit PAC/401 Line 9
24	Gross up for Franchise Taxes and Bad Debt Expense ⁽¹⁾	\$ 8,938	\$ 1,035	\$ 9,973	Exhibit PAC/605 Line 11
25	Allowance Revenue Approved for Clean Energy or Efficiency Programs ⁽²⁾	\$ 6,468,122	\$ -	\$ 6,468,122	Exhibit PAC/605 Line 14
26	Subtotal Forecast Expenses	\$ 7,007,905	\$ 52,195	\$ 7,060,100	
27	Net GHG Revenues Available for Return (Lines 20 + 26)			\$ (88,816,686)	
	GHG Revenue Amount Returned to Eligible Customers				
28	(2013 - 2021)	\$ 83,267,828	\$ 3,533,604.33	\$ 86,801,432	
29	GHG Allowance Revenue Balancing Account (Under) / Over			\$ (2,015,253)	

⁽¹⁾ Authorized factor of 98.1867565% applies from 2013 - 2018, and 97.977602% from 2019 forward

⁽²⁾ Commission Decision (D.) 17-12-022 Ordering Paragraph 5 requires PacifiCorp to reserve 10% of the proceeds from the sale of greenhouse gas proceeds for use in the Solar on Multifamily Affordable Housing Program. The set aside started mid-year in 2016 when the company was directed to set aside 5% for half of 2016 and 10% annually thereafter. Also refer to the direct testimony of Ms. Judith M. Ridenour and Line 14 of Ms. Ridenour's Confidential Exhibit PAC/605 which shows the funds set aside for the Program.

CONFIDENTIAL INFORMATION IS SHADED

Application No. 21-08-_____
Exhibit No. PAC/208
Witness: Mary M. Wiencke

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

2022 Forecast GHG Allowance Revenue

CONFIDENTIAL

August 2, 2021

Exhibit PAC/208
PacifiCorp
2022 Forecast GHG Allowance Revenue
August 2, 2021

Line No.	Description	Volume ⁽¹⁾	Price ⁽²⁾	Dollars
1	Auction Date:			
2	February 2022		\$19.36	
3	May 2022		\$19.36	
4	August 2022		\$19.36	
5	November 2022		\$19.36	
6	Total 2022 Forecast	550,696		(\$10,661,475)

⁽¹⁾ Volume is set by 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. The Annual Allowance allocation may be reduced by CARB to account for EIM Purchaser Emissions. The forecast amount of EIM Purchaser Emissions unknown as of the time of this filing but is expected to be relatively small.

⁽²⁾ The Company used March 31, 2021 forward ICE settlement price for forecasted GHG allowances with December delivery of the forecast year consistent with forward prices for other commodities in its respective 2022 ECAC filed as part of this application.

CONFIDENTIAL INFORMATION IS SHADED

Application No. 21-08-_____
Exhibit No. PAC/209
Witness: Mary M. Wiencke

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Commission Template D-5 History of Revenues, Costs, and Emissions Intensity

CONFIDENTIAL

August 2, 2021

CONFIDENTIAL
Exhibit PAC/209
PacifiCorp
Commission Template D-5
History of Revenue, Costs, and Emissions Intensity
August 2, 2021

Line		2013 Actual	2014 Actual	2015 Actual	2016 Actual	2017 Actuals	2018 Actuals
1	Total GHG Revenues (\$) Note 1	\$ (9,106,055)	\$ (17,893,007)	\$ (12,402,688)	\$ (10,185,249)	\$ (8,724,275)	\$ (10,866,848)
2	Total GHG Costs (\$) Note 2						
3	Emissions Intensity (MTCO ₂ e/MWh)	0.713	0.729	0.742	0.687	0.684	0.685

Note 1: See Confidential Exhibit PAC/605, Line 17

Note 2: See Confidential Exhibit PAC/202, Line 17

CONFIDENTIAL INFORMATION IS SHADED

Application No. 21-08-_____
Exhibit No. PAC/300-304
Witness: Ashley Rask

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Direct Testimony of Ashley Rask

August 2, 2021

Table of Contents

I.	Witness Qualifications	1
II.	Summary of Testimony	1
III.	Reconciliation of Forecast and Actual Recorded 2020 and 2021 Customer Outreach Costs	2
IV.	Forecast 2022 Customer Outreach Costs	3

Attached Exhibits

Exhibit PAC/301 – 2013-2021 Recorded/Forecast Customer Outreach Costs

Exhibit PAC/302 – 2022 Customer Outreach Activities and Estimated Costs

Exhibit PAC/303 – 2022 Forecast Customer Outreach Costs

Exhibit PAC/304 – Commission Template D-3 – Detail of Outreach Costs

I. Witness Qualifications

1

2 **Q. Please state your name, business address, and present position with PacifiCorp**
3 **d/b/a Pacific Power (PacifiCorp or Company).**

4 A. My name is Ashley Rask. My business address is 825 NE Multnomah Street, Suite
5 2000, Portland, Oregon 97232. I am a Senior Communications Representative in the
6 Customer and Corporate Communications department of the Company.

7 **Q. Briefly describe your education and business experience.**

8 A. I hold a Bachelor of Arts in English from Portland State University. I joined
9 PacifiCorp in 2017 as a Communications Representative, where I've led the
10 communications for PacifiCorp's energy assistance and regulatory outreach,
11 including bill inserts, mailings and media. From 2015 to 2017, I worked as an Ads
12 Quality Rater at ZeroChaos remotely in Portland, Oregon.

13 **Q. Please explain your responsibilities as PacifiCorp's Senior Communications**
14 **Representative.**

15 A. I primarily oversee PacifiCorp communications for our energy efficiency programs to
16 ensure they are integrated and aligned with the Company's brand and goals,
17 coordinated with regulatory processes, program changes, external communications,
18 social media, traditional media, and other outreach and support.

II. Summary of Testimony

19

20 **Q. Please summarize your testimony.**

21 A. My testimony reconciles PacifiCorp's forecast and actual recorded 2020 and 2021
22 customer outreach costs as compared to the forecast set out in PacifiCorp's last
23 application filed August 3, 2020, Application (A.) 20-08-002 (2021 Application). My

1 testimony also forecasts PacifiCorp's 2022 customer outreach costs associated with
2 its participation in California's Cap and Trade Program.

3 **III. Reconciliation of Forecast and Actual Recorded 2020 and 2021 Customer**
4 **Outreach Costs**

5 **Q. How much did PacifiCorp spend on customer outreach in 2020?**

6 A. PacifiCorp recorded \$75,268 for outreach in 2020, which is \$268 more than the
7 \$75,000 projected in PacifiCorp's 2021 Application. See PAC/301.

8 **Q. Why were 2020 outreach costs higher than anticipated in PacifiCorp's 2021**
9 **Application?**

10 A. An outstanding vendor invoice from PacifiCorp's 2019 outreach was processed in
11 January 2020, making total costs slightly higher than estimated for 2020.

12 **Q. What is the 2021 customer outreach budget approved by the California Public**
13 **Utilities Commission (Commission)?**

14 A. The Greenhouse Gas (GHG)-related costs and allowance proceeds portion of the
15 2021 Application was approved by the Commission in Decision (D.) 21-03-007. The
16 Commission approved PacifiCorp's proposed customer outreach budget of \$80,000
17 for 2021.¹

18 **Q. How much has PacifiCorp spent on customer outreach in 2021?**

19 A. From January 1, 2021 through May 31, 2021, the Company spent \$32,850 on
20 customer outreach. PacifiCorp's authorized budget for customer outreach in 2021 is
21 \$80,000. Based on that projection, there is \$47,150 remaining in the budget to be
22 spent in 2021.² The Company plans to undertake additional outreach in October and

¹ D.21-03-007 at 10.

² See Exhibit PAC/301.

1 November of 2021 to coincide with the California Climate Credit distribution. The
2 outreach will include a bill insert, bill message, email, as well as paid radio, digital,
3 social media, and newspaper advertising. The outreach will remind customers to look
4 for the California Climate Credit from the state of California's Cap and Trade
5 Program on their October and November bills. Outreach will encourage them to use
6 the California Climate Credit to achieve more savings by investing in energy-saving
7 upgrades for their homes – for example, new energy-efficient lights, appliances, and
8 weatherization.

9 **IV. Forecast 2022 Customer Outreach Costs**

10 **Q. What are PacifiCorp's 2022 forecast customer outreach costs?**

11 A. Based on the customer outreach plan outlined in Exhibit PAC/302, PacifiCorp
12 expects to incur \$80,000 in customer outreach costs for 2022, which is the same as
13 2021. See PAC/302 and PAC/303.

14 **Q. What is the basis for the forecast customer outreach costs, including the**
15 **accounting and explanation of activities expected to be undertaken and costs**
16 **expected to be incurred?**

17 A. The Company believes this budget will allow for effective communication with
18 customers about the Cap and Trade Program. For 2022, PacifiCorp will continue to
19 actively engage with customers with an integrated, multi-channel campaign designed
20 to build awareness of the GHG revenue returns and the semi-annual California
21 Climate Credit. The outreach will also provide basic information about the value of
22 the Cap and Trade Program and provide ongoing support to help customers learn
23 more about how to adopt and sustain energy-efficient practices to reduce their GHG

1 emissions.

2 As in prior years, PacifiCorp's 2022 outreach plan will include inserts in
3 customer bills to remind customers about the Cap and Trade Program and the
4 California Climate Credit. To reach customers who receive paperless bills,
5 PacifiCorp will send email communications. PacifiCorp will also place paid radio,
6 digital, social, and newspaper advertising about the California Climate Credit and
7 also communicate with customers through low-cost channels, such as on-bill
8 messages. PacifiCorp will use web-based communication platforms, social media, the
9 Company's customer contact center, and customer-facing employees working in
10 California to communicate with customers.

11 **Q. Has the Company included Commission Template D-3 with this application?**

12 A. Yes. Commission Template D-3³ provides an overview of the customer outreach and
13 program administrative costs, forecast and recorded, from 2013 to 2021. Customer
14 outreach costs are addressed in my testimony and administrative costs are addressed
15 in the testimony of Mr. Anthony B. Worthington. Because these topics are addressed
16 by different PacifiCorp witnesses, the template has been divided into two parts for
17 this submission. Template D-3 – Detail of Outreach Costs is provided as Exhibit
18 PAC/304. Much of this same data may also be found in Exhibits PAC/301, PAC/302,
19 and PAC/303. For Template D-3 – Detail of Administrative Costs, refer to Mr.
20 Worthington's Exhibit PAC/403.

21 **Q. Does this conclude your direct testimony?**

22 A. Yes.

³ See D.14-10-033, D.14-10-055, and D.15-01-024.

Application No. 21-08-_____
Exhibit No. PAC/301
Witness: Ashley Rask

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

2013 - 2021 Recorded/Forecast Customer Outreach Costs

August 2, 2021

Exhibit PAC/301
PacifiCorp
2013 - 2021 Recorded/Forecast Customer Outreach Costs
August 2, 2021

Line No.	Description	Recorded-to- Date (as of 5/31/2021)	Estimated 6/1/20 - 12/31/21	Total 12/31/21
1	Recorded/Forecast Expenses 2013 - 2021:			
2	GHG Outreach and Education Costs - 2013 ⁽¹⁾	\$ 1,403	\$ -	\$ 1,403
3	GHG Outreach and Education Costs - 2014 ⁽²⁾	\$ 51,596	\$ -	\$ 51,596
4	GHG Outreach and Education Costs - 2015 ⁽³⁾	\$ 59,748	\$ -	\$ 59,748
5	GHG Outreach and Education Costs - 2016 ⁽⁴⁾	\$ 82,027	\$ -	\$ 82,027
6	GHG Outreach and Education Costs - 2017 ⁽⁵⁾	\$ 56,663	\$ -	\$ 56,663
7	GHG Outreach and Education Costs - 2018 ⁽⁶⁾	\$ 65,690	\$ -	\$ 65,690
8	GHG Outreach and Education Costs - 2019 ⁽⁷⁾	\$ 66,980	\$ -	\$ 66,980
9	GHG Outreach and Education Costs - 2020 ⁽⁸⁾	\$ 75,268	\$ -	\$ 75,268
10	GHG Outreach and Education Costs - 2021 ⁽⁹⁾	\$ 32,850	\$ 47,150	\$ 80,000
11	Total	\$ 492,225	\$ 47,150	\$ 539,375

⁽¹⁾See A.14-08-003 Exhibit PAC/200 and Exhibit PAC/202 for a discussion about actual GHG outreach and education costs recorded in 2013.

⁽²⁾See A.15-08-004 Exhibit PAC/300 and Exhibit PAC 301 for a discussion about actual GHG outreach and education costs recorded in 2014.

⁽³⁾See A.16-08-001 Exhibit PAC/300 and Exhibit PAC/301 for a discussion about actual GHG outreach and education costs recorded in 2015.

⁽⁴⁾See A.17-08-005 Exhibit PAC/300 and Exhibit PAC/301 for a discussion about actual GHG outreach and education costs recorded in 2016.

⁽⁵⁾See A.18-08-001 Exhibit PAC/300 and Exhibit PAC/301 for a discussion about actual GHG outreach and education costs recorded in 2017.

⁽⁶⁾See A.19-08-002 Exhibit PAC/300 and Exhibit PAC/301 for a discussion about actual GHG outreach and education costs recorded in 2018.

⁽⁷⁾See A.20-08-002 Exhibit PAC/300 and Exhibit PAC/301 for a discussion about actual GHG outreach and education costs recorded in 2019.

⁽⁸⁾See Exhibit PAC/300, page 2

⁽⁹⁾See PAC/300, page 2-3.

Application No. 21-08-_____
Exhibit No. PAC/302
Witness: Ashley Rask

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

2022 Customer Outreach Activities and Estimated Costs

August 2, 2021

Exhibit PAC/302
PacifiCorp
2022 Customer Outreach Activities and Estimated Costs
August 2, 2021

Outreach Activity	Description	Timing	Estimated Cost
Bill insert	Create regulatory-style bill onsert explaining the program and impact on customer rates and encourage customers to use their credit for energy efficiency upgrades. (combined and costs split with ECAC)	August 2022	\$3,500
Print Ads Mailing to government officials	Place regulatory-style print ads in northern California newspapers and mail letter to city/county officials	August 2022	\$2,300
Talking Points for customer contact center	Update simple talking point to help agents answer customer questions	August 2022	\$0
Bill insert	Print CPUC letter and provide as a bill insert for residential customers about the California Climate Credit	April and October 2022	\$5,000
Email	Provide targeted email to our paperless billing residential customers about the Climate Credit	April and October 2022	\$2,000
Radio	Use English radio spots and targeted Spanish digital radio commercials and media buy to inform customers about California's Climate Credit	April and October 2022 (10 weeks)	\$30,000

Outreach Activity	Description	Timing	Estimated Cost
Newspaper	Use newspaper advertising to support messages in the radio and bill insert timed around California Climate Credit distribution	April and October 2022 (10 weeks)	\$16,000
Digital	Use digital advertising to support messages in the radio and bill insert timed around California Climate Credit distribution.	April and October 2022	\$16,000
Bill message	Include Cap-and-Trade messaging on residential and small business customers' electric bills. On-bill messages are limited to 235 characters & spaces. For residential and small business	April and October 2022 for residential customers. All year for small business customers.	\$0
Newsletter articles	Include relevant stories in the California editions of existing customer newsletters reaching residential customers.	<i>Connect newsletter April & October issues 2022</i>	\$0
Direct Mail	Mailing to master-metered customers to inform them of their obligation to pass the California Climate Credit on to tenants in mobile-homes served by a master meter.	Q1 & Q3	\$200

Outreach Activity	Description	Timing	Estimated Cost
Creative Costs	Funding for the print, digital, social and radio ads that the Company's design agency will assist in creating.	April and October 2022	\$5,000
Social Media	Leverage PacifiCorp's Facebook and Twitter feeds to remind customers about the Climate Credit and provide key facts and sources of additional Cap-and-Trade program information.	Q2 & Q3	\$0
Total for 2022			\$80,000

Application No. 21-08-_____
Exhibit No. PAC/303
Witness: Ashley Rask

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

2022 Forecast Customer Outreach Costs

August 2, 2021

Exhibit PAC/303
PacifiCorp
2022 Forecast Customer Outreach Costs
August 2, 2021

Line No.	Description	Forecast for 2022
1	Forecast Expenses 2022	
2	GHG Outreach and Education Costs - 2022 (See Exhibit PAC/302)	<u>\$ 80,000</u>
3	Total	<u><u>\$ 80,000</u></u>

Application No. 21-08-_____
Exhibit No. PAC/304
Witness: Ashley Rask

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Commission Template D-3 (Note 1)
Detail of Outreach Expenses

August 2, 2021

Exhibit PAC/304
PacifiCorp
Commission Template D-3 (Note 1)
Detail of Outreach Expenses
August 2, 2021

Line Description	2013		2014		2015		2016		2017		2018		2019		2020		2021 (Note 2)		2022	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1 Utility Outreach																				
2 Detail of outreach activities	59,748	1,403	110,000	51,596	110,000	59,748	80,000	82,027	85,000	56,663	85,000	65,690	75,000	66,980	75,000	75,268	80,000	80,000	80,000	
3 Additional (Non-Utility) Statewide Outreach	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Total Outreach	59,748	1,403	110,000	51,596	110,000	59,748	80,000	82,027	85,000	56,663	85,000	65,690	75,000	66,980	75,000	75,268	80,000	80,000	80,000	-

Note 1: This is Commission Template D-3. The template provided by the Commission included outreach and administrative costs in the same table. The template has been split into two tables, one for outreach costs and one for administrative costs, so that each table may be included as an exhibit for the appropriate Company witness. Exhibit PAC/304 is the detail of outreach costs. Exhibit PAC/403 is detail of administrative costs, accompanying Mr. Tony Worthington's testimony.

Note 2: Recorded amount includes forecast expenditures for the remainder of 2021.

Application No. 21-08-_____
Exhibit No. PAC/400 – 403
Witness: Anthony B. Worthington

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Direct Testimony of Anthony B. Worthington

August 2, 2021

Table of Contents

I. Witness Qualifications	1
II. Summary of Testimony	1
III. Reconciliation of Forecast and Actual Recorded 2020 and 2021 Administrative Costs ..	2
IV. Forecast 2022 Administrative Costs.....	3

Attached Exhibits

Exhibit PAC/401 – 2013-2021 Recorded/Forecast Administrative Costs

Exhibit PAC/402 – 2022 Forecast Administrative Costs

Exhibit PAC/403 – Commission Template D-3 – Detail of Administrative Costs

I. Witness Qualifications

1

2 **Q. Please state your name, business address, and present position with PacifiCorp**
3 **d/b/a Pacific Power (PacifiCorp or Company).**

4 A. My name is Anthony B. Worthington. My business address is 825 NE Multnomah
5 Street, Suite 600, Portland, Oregon 97232. I am the Customer Services manager of
6 billing within the Company.

7 **Q. Briefly describe your education and business experience.**

8 A. I hold a Bachelor of Business Administration from the University of Oregon. I joined
9 PacifiCorp in May 1997, and assumed my current position in December 2015.

10 **Q. Please explain your responsibilities as PacifiCorp's Manager of Billing within**
11 **Customer Services.**

12 A. I manage the Company's customer billing services for approximately 1.9 million
13 customers, including complex managed accounts billing, and the customer service
14 billing system's implementation of commission-approved price and rate changes for
15 PacifiCorp's six-state service territory.

16 **II. Summary of Testimony**

17 **Q. Please summarize your direct testimony.**

18 A. My testimony reconciles PacifiCorp's actual recorded administrative costs incurred in
19 2020 and year-to-date through May 31, 2021, as compared to the forecast set out in
20 PacifiCorp's last application filed August 3, 2020, Application (A.) 20-08-002 (2021
21 Application). My testimony also provides an overview of the administrative costs the
22 Company expects to incur in 2022 for administering the Greenhouse Gas (GHG) Cap

1 and Trade Program (Cap and Trade Program), namely related to the distribution of
2 Climate Credits.

3 **III. Reconciliation of Forecast and Actual Recorded 2020 and 2021 Administrative**
4 **Costs**

5 **Q. What were the 2020 GHG Program administrative costs?**

6 A. The Company incurred \$4,440 in Cap and Trade Program administrative costs in
7 2020, which was less than the \$5,600 originally projected in the 2021 Application.
8 See Exhibits PAC/401 and PAC/403. The Company tracked the number of checks
9 requested following the distribution of the California Climate Credits in 2020.

10 **Q. What are the drivers of the administrative costs incurred in 2020?**

11 A. The Company's administrative costs are driven primarily by the cost to issue checks
12 to customers with a surplus account balance. In 2020, a total of 888 checks were
13 issued to customers with a surplus balance who requested payment via check. The
14 Company estimates the incremental cost for issuing each check to be \$5,¹ which
15 represents the cost for the bank to issue and mail a check. At a cost of \$5 per check,
16 the total cost for issuing 888 checks in 2020 was \$4,440.

17 **Q. What administrative costs does PacifiCorp expect to incur in 2021?**

18 A. The budget for 2021 approved in Decision 21-03-007 is \$5,600. From January 1,
19 2021, through May 31, 2021, PacifiCorp has incurred \$990 in administrative costs for
20 issuing checks to customers. There is \$4,610 remaining in the budget for 2021,

¹ See Direct Testimony of Ms. Valerie F. Smith Exhibit PAC/300 at page 3 in A.14-08-003. Administrative costs include the costs for printing and mailing the check and do not include internal labor costs. The Company will continue to monitor this process and if it finds that incremental labor is required, it may include these costs in the future.

1 however the Company expects to incur \$4,010 from June 1, 2021 through the
2 remainder of the year, for a total of \$5,000. *See* Exhibit PAC/401. The Company
3 tracked the number of checks requested following the distribution of the California
4 Climate Credit in April 2021. A total of 198 checks were issued to customers with a
5 surplus balance remaining in their account. At a cost of \$5, the total cost for issuing
6 checks through May 31 in 2021 was \$990. The Company believes it will receive a
7 number of requests after the October-November 2021 distribution resulting in
8 administrative costs equal to at least \$5,000 for the year, which is less than the 2021
9 budget of \$5,600.² Any difference will be trued-up in the Company's next
10 application filed in August 2022.

11 **IV. Forecast 2022 Administrative Costs**

12 **Q. What are the 2022 forecast administrative costs?**

13 A. For 2022, PacifiCorp forecasts that it will incur \$5,000 in administrative costs
14 specific to the Cap and Trade Program. This funding is for administrative activities
15 associated with the semi-annual disbursement of the residential California Climate
16 Credit including customer-requested check processing for the surplus account
17 balance. *See* Exhibit PAC/402.

18 **Q. What is the basis for the 2022 forecast program administrative costs?**

19 A. The forecasted administrative costs reflect trends in the volume of checks requested
20 in 2020 and anticipated volume of requests in 2021. The number of checks issued in
21 2020 were lower than 2019 and continued a reduction in customers requesting
22 refunds since the start of the program. PacifiCorp believes this to reflect a preference

² *See* D.21-03-007 at 10.

1 of customers to have the credit applied against their electric account balance rather
2 than returned in a check. Accordingly, the Company forecasts \$5,000 for
3 administrative costs in 2022 to cover the costs associated with the issuance of checks.

4 **Q. Has the Company included Commission Template D-3 with this application?**

5 A. Yes. Commission Template D-3³ provides an overview of forecast and recorded
6 customer outreach and program administrative costs from 2013 to 2022.

7 Administrative costs are addressed in my testimony and customer outreach costs are
8 addressed in the testimony of Ms. Ashley Rask. Because these topics are addressed
9 by different PacifiCorp witnesses, the template has been divided into two parts.

10 Template D-3 – Detail of Administrative Costs is provided as Exhibit PAC/403.

11 Much of this same data may also be found in Exhibits PAC/401 and PAC/402. For

12 Template D-3 – Detail of Outreach Costs, refer to Ms. Rask’s Exhibit PAC/304.

13 **Q. Does this conclude your direct testimony?**

14 A. Yes.

³ See D.14-10-033, D.14-10-055, and D.15-01-024.

Application No. 21-08-_____
Exhibit No. PAC/401
Witness: Anthony B. Worthington

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

2013 - 2021 Recorded/Forecast Administrative Costs

August 2, 2021

Exhibit PAC/401
PacifiCorp
2013 - 2021 Recorded/Forecast Administrative Costs
August 2, 2021

Line No.	Description	Recorded (as of 5/31/2021)	Estimated 6/1/2021 - 12/31/2021	Total 12/31/2021
1	Recorded/Forecast Expenses 2013 - 2021:			
2	GHG Administrative Costs - 2013 ⁽¹⁾	\$ -	\$ -	\$ -
3	GHG Administrative Costs - 2014 ⁽²⁾	\$ 6,345	\$ -	\$ 6,345
4	GHG Administrative Costs - 2015 ⁽³⁾	\$ 6,580	\$ -	\$ 6,580
5	GHG Administrative Costs - 2016 ⁽⁴⁾	\$ 5,645	\$ -	\$ 5,645
6	GHG Administrative Costs - 2017 ⁽⁵⁾	\$ 3,960	\$ -	\$ 3,960
7	GHG Administrative Costs - 2018 ⁽⁶⁾	\$ 5,015	\$ -	\$ 5,015
8	GHG Administrative Costs - 2019 ⁽⁷⁾	\$ 5,645	\$ -	\$ 5,645
9	GHG Administrative Costs - 2020 ⁽⁸⁾	\$ 4,440	\$ -	\$ 4,440
10	GHG Administrative Costs - 2021 ⁽⁹⁾	\$ 990	\$ 4,010	\$ 5,000
11	Other	\$ -	\$ -	\$ -
12	Total	\$ 38,620	\$ 4,010	\$ 42,630

⁽¹⁾ See A.14-08-003 Exhibit PAC/300 page 2 for a discussion about actual GHG administrative costs incurred in 2013.

⁽²⁾ See A.15-08-004 Exhibit PAC/400 page 2 for a discussion about actual GHG administrative costs recorded in 2014.

⁽³⁾ See A.16-08-001 Exhibit PAC/400 page 2 for a discussion about actual GHG administrative costs recorded in 2015.

⁽⁴⁾ See A.17-08-005 Exhibit PAC/400 page 2 for a discussion about actual GHG administrative costs recorded in 2016.

⁽⁵⁾ See A.18-08-001 Exhibit PAC/400 page 2 for a discussion about actual GHG administrative costs recorded in 2017.

⁽⁶⁾ See A.19-08-002 Exhibit PAC/400 page 2 for a discussion about actual GHG administrative costs recorded in 2018.

⁽⁷⁾ See A.20-08-002 Exhibit PAC/400 page 2 for a discussion about actual GHG administrative costs recorded in 2019.

⁽⁸⁾ See Exhibit PAC/400 page 2-3.

⁽⁹⁾ See Exhibit PAC/400 page 2-3.

Application No. 21-08-_____
Exhibit No. PAC/402
Witness: Anthony B. Worthington

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

2022 Forecast Administrative Costs

August 2, 2021

Exhibit PAC/402
PacifiCorp
2022 Forecast Administrative Costs
August 2, 2021

Line No.	Description	Forecast for 2022
1	Forecast Expenses 2022	
2	GHG Administrative Costs ⁽¹⁾	<u>\$ 5,000</u>
3	Total	<u><u>\$ 5,000</u></u>

⁽¹⁾ See Exhibit PAC/400 page 3-4.

Application No. 21-08-_____
Exhibit No. PAC/403
Witness: Anthony B. Worthington

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Commission Template D-3 (Note 1)
Detail Administrative Costs

August 2, 2021

Exhibit PAC/403
PacifiCorp
Commission Template D-3 (Note 1)
Detail of Administrative Costs
August 2, 2021

Line Description	2013		2014		2015		2016		2017		2018		2019		2020		2021 (Note 2)		2022	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1 Utility Administrative																				
2 Detail of administrative activities	-	-	-	6,345	5,000	6,580	7,500	5,645	7,000	3,960	5,000	5,015	4,500	5,645	5,100	4,440	5,600	5,000	5,000	-
3 Total Administrative Expenses	-	-	-	6,345	5,000	6,580	7,500	5,645	7,000	3,960	5,000	5,015	4,500	5,645	5,100	4,440	5,600	5,000	5,000	-

Note 1: This is Commission Template D-3. The template provided by the Commission included outreach and administrative costs in the same table. The template has been split into two tables, one for outreach costs and one for administrative costs, so that each table may be included as an exhibit for the appropriate Company witness. Exhibit PAC/304 provided with the testimony of Ms. Rask is the detail of outreach costs. Exhibit PAC/403 is detail of administrative costs.

Note 2: Recorded amount includes forecast expenditures for the remainder of 2021.

Application No. 21-08-_____
Exhibit No. PAC/500
Witness: Dana M. Ralston

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Direct Testimony of Dana M. Ralston

HIGHLY CONFIDENTIAL

[PUBLIC VERSION]

August 2, 2021

Table of Contents

I.	QUALIFICATIONS.....	2
II.	PURPOSE AND SUMMARY OF TESTIMONY	2
III.	NEW COAL SUPPLY AGREEMENTS.....	3
IV.	THE HUNTINGTON COAL SUPPLY AGREEMENT	4
V.	THE HAYDEN COAL SUPPLY AGREEMENT	7

1 **Q. Please state your name, business address, and present position with PacifiCorp d/b/a**
2 **Pacific Power (PacifiCorp or Company).**

3 A. My name is Dana M. Ralston. My business address is 1407 West North Temple, Suite
4 210, Salt Lake City, Utah 84116. My title is Senior Vice President of Thermal
5 Generation and Mining.

6 **I. QUALIFICATIONS**

7 **Q. Briefly describe your education and professional experience.**

8 A. I have a Bachelor of Science Degree in Electrical Engineering from South Dakota State
9 University. I was previously Vice President of Coal Generation and Mining from March
10 2015 to November 2017, and Vice President of Thermal Generation from January 2010
11 to March 2015. For 29 years before that, I held a number of positions of increasing
12 responsibility within Berkshire Hathaway Energy's generation organization, including
13 plant manager at the Neal Energy Center generating complex. In my current role, I am
14 responsible for operating and maintaining PacifiCorp's coal- and gas-fired generation
15 fleet, coal fuel supply, and mining.

16 **Q. Have you testified in previous regulatory proceedings?**

17 A. Yes. I have provided testimony on behalf of the Company in proceedings before the
18 Public Utilities Commission of the State of California (Commission) and the public
19 utility commissions of Oregon, Utah, Washington, and Wyoming.

20 **II. PURPOSE AND SUMMARY OF TESTIMONY**

21 **Q. What is the purpose of your testimony in this proceeding?**

1 A. In its approval of the Company's 2020 Energy Cost Adjustment Clause (ECAC) rates in
2 Decision (D.) 20-12-004, the Commission directed PacifiCorp to (1) provide testimony
3 with its annual ECAC application addressing the prudence of any new coal supply
4 agreements (CSAs) executed after the record was submitted in the ECAC filing from the
5 previous year; and (2) to provide a report in its 2022 ECAC Application that addresses
6 "the minimum take provisions included in its long-term CSAs (with terms of five years or
7 longer), including whether any of the clauses should be invoked, as well as the associated
8 ratepayer savings."¹

9 My testimony addresses the fact that no new CSAs have been entered into since
10 the record was submitted in the 2021 ECAC and provides the details requested by the
11 Commission is D.20-12-004 regarding the two existing long-term CSAs, which are at the
12 Huntington generating facility and the Hayden generating facility².

13 III. NEW COAL SUPPLY AGREEMENTS

14 **Q. Has PacifiCorp entered into any new CSAs since the record was submitted in the**
15 **2021 ECAC?**

16 A. No. If PacifiCorp enters into a new CSA during the pendency of this proceeding,
17 PacifiCorp will notify parties when the CSA is executed and work with them to identify
18 the appropriate review process. Further, PacifiCorp will file required information
19 regarding the prudence of any new CSAs with its rebuttal testimony.

¹ *In the Matter of the Application of PacifiCorp (U901E) for Approval of its 2020 Energy Cost Adjustment Clause and Greenhouse Gas-Related Forecast and Reconciliation of Costs and Revenue*, D.20-12-004 at 24-25 (Dec 7, 2020).

² The current CSA at the Colstrip facility runs to December 31, 2024 with the option of a one-year extension. However, as the remaining term is less than 5 years, it is not addressed in this testimony.

IV. THE HUNTINGTON COAL SUPPLY AGREEMENT

Q. Please provide an overview of the Huntington CSA.

A. The Company negotiated the Huntington CSA in 2014 and 2015 and executed the contract in 2015. The CSA's term extends to 2029. As was explained in the record in A.15-09-007, the Huntington CSA was a critical element of the Company's decision to close the Deer Creek mine. Without the reliable coal supply for the plant provided by the Huntington CSA, the Company could not have closed the mine. The Commission found at the time that "the new long-term contract with Bowie to supply coal to the Huntington power plant is expected to reduce operating costs through lower sulfur content, while also including provisions that protect PacifiCorp against obligations to continue purchasing coal in the event of new laws, rules or regulations."³

Q. Have the costs incurred in association with the Huntington CSA been reflected in prior ECACs?

A. Yes, the Huntington CSA has been reflected in customer rates since 2016.

Q. What information did the Company consider when negotiating the minimum take levels in the Huntington CSA?

A. PacifiCorp looked at the forecasted generation for the remaining life of the Huntington plant. When the Company negotiated the Huntington CSA, the minimum take level represented approximately [Begin Confidential] [REDACTED] [End Confidential] of the forecasted plant generation developed using the information available in 2014 and 2015 when the Company negotiated and executed the CSA.

³ In the Matter of the Application of PacifiCorp (U901E) for Authority to Sell Certain Mining Assets in Accordance with Public Utilities Code Section 851, D.18-09-008 at 22-23.

1 **Q. Does the Huntington CSA allow the Company to terminate or reduce coal purchases**
2 **in the agreement if environmental laws or regulations affect the economics of the**
3 **plant?**

4 A. Yes, generally speaking. Article 8 of the CSA allows the Company to [Begin Highly
5 Confidential] [REDACTED]

6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] [End Highly Confidential]

17 In docket UM 1712 in Oregon, the Company explained:

18 The Company negotiated Article 8 in recognition of the uncertainty now
19 inherent in the environmental regulation of coal generation. The
20 Company's intent was to secure broad flexibility in responding to the
21 impact of the changing environmental regulations or settlements on
22 Huntington, including the ability to terminate the CSA without
23 liquidated damages if future changes in applicable environmental
24 requirements affect the Company's ability to operate Huntington as a
25 coal-fired facility . . . The Company intended Article 8 to address a
26 scenario where an environmental requirement made the continued
27 operation of the plant as a coal-fired facility uneconomic.⁴

28 **Q. Has legislation like the 100 percent clean electricity laws passed in California**
29 **(Senate Bill (SB) 350), Washington (SB 5116) and Oregon (SB 1547), which also**
30 **phase out coal plants provide a basis to terminate the CSA?**

⁴ *In the Matter of PacifiCorp dba Pacific Power, Application for Approval of Deer Creek Mine Transaction*, Docket No. UM 1712, Or. Pub. Util. Comm'n, PAC/500, Crane/6 (Mar. 19, 2015).

1 A. No. The Company does not have the right to terminate the Huntington CSA based on the
2 laws cited above. The effects of an environmental regulation must be more directly
3 applicable to the Huntington plant; the potentially indirect impact on Huntington from
4 clean energy legislation is not a basis to seek termination of the CSA. To the extent the
5 Company can establish a clear connection between an implemented regulation and its
6 effects on the operation of the Huntington plant, including economic effects, then the
7 Company believes the exercise of the Article 8 rights would be warranted and defensible.
8 The potential impacts resulting from the legislation cited above, however, appear to be
9 largely speculative and remote, and lack any direct, causal link between the
10 environmental regulation and the effects on the plant. As such, the resultant effects, if
11 any, would likely be an indefensible basis to trigger the rights provided for under Article
12 8.

13 **Q. At this time, are you aware of any other current or anticipated environmental**
14 **statutes or regulations that might allow the Company to terminate the coal supply**
15 **agreement pursuant to Article 8?**

16 A. No.

17 **Q. Would termination of this contract result in costs to customers?**

18 A. Yes, the termination of this contract would result in an unjustified cost to customers. If
19 the Company were to terminate the existing agreement, the Company would likely not be
20 able to replace the existing supplier, [Begin Confidential] [REDACTED] [End
21 Confidential], with other supplier(s) that can provide the quantity and quality of coal
22 required to operate the plant. The Utah coal market does not have a high degree of
23 liquidity. [Begin Confidential] [REDACTED] [End Confidential] is the largest supplier

1 of low sulfur coal in Utah. The Company is already purchasing Utah's other low sulfur
2 coal supplier's [Begin Confidential] ([End Confidential]) production for
3 the Hunter plant under a four-year coal supply agreement that was executed in 2020.
4 Termination and renegotiation is risky and would likely not improve the economics of the
5 plant or be in customers' interest.

6 **Q. Are there circumstances where the Company would recommend exercising Article**
7 **8 of the Huntington CSA?**

8 A. There may be future circumstances that would properly lead the Company to terminate
9 the coal supply agreement pursuant to Article 8. These circumstances would include a
10 new environmental rule or regulation where a negative economic effect on the
11 Huntington plant could be substantiated and where termination could be demonstrated to
12 be in the customers' interest.

13 **V. THE HAYDEN COAL SUPPLY AGREEMENT**

14 **Q. Please provide an overview of the Hayden CSA.**

15 A. PacifiCorp is a minority owner in the Hayden generating facility (17.5 percent), along
16 with Public Service Company of Colorado (PSCo) and the Salt River Project (SRP).
17 PacifiCorp negotiated the CSA in collaboration with PSCo and SRP in order to secure
18 future fuel requirements for Hayden from the nearby Twenty-mile mine owned and
19 operated by Peabody Energy Corporation. The CSA was finalized and executed on
20 December 12, 2011 and runs to December 31, 2027. Hayden has two units; Unit 2 is
21 scheduled for closure in 2027 and Unit 1 is scheduled for closure in 2028.

22 **Q. Have the costs incurred in association with the Hayden CSA been reflected in prior**
23 **ECACs?**

1 A. Yes, the Hayden CSA has been reflected in customer rates since 2012.

2 **Q. What information did the Company consider when negotiating the minimum take**
3 **levels in the Hayden CSA?**

4 A. At the time that the Hayden CSA was being negotiated with the other Hayden plant
5 owners, PacifiCorp looked at the plant's forecasted generation. PacifiCorp's share of the
6 annual minimum tonnage requirement represented only [Begin Confidential] [REDACTED]
7 [End Confidential] of the forecasted plant generation requirement from 2011 to 2020.

8 **Q. Can the Hayden CSA be terminated if environmental laws or regulations affect the**
9 **economics of the plant?**

10 A. Only if the laws or regulations make operation of the plant [Begin Highly Confidential]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED] [End

14 Highly Confidential]

15 **Q. Has legislation like the 100 percent clean electricity laws passed in California (SB**
16 **350), Washington (SB 5116) and Oregon (SB 1547), which also phase out coal plants**
17 **provide a basis to terminate the CSA?**

18 A. No, these changes in the laws have not made the operation of the plant or performance of
19 the buyer's material obligations [Begin Highly Confidential] [REDACTED]
20 [REDACTED]. [End Highly Confidential]

21 **Q. Since Hayden is a jointly-owned facility, how would the exercise of this provision**
22 **work in practice?**

1 A. The determination about whether the change in law would result in the [Begin Highly
2 Confidential] [REDACTED]
3 [REDACTED] [End Highly Confidential] PacifiCorp is unable to exercise any
4 provision of the CSA unilaterally.

5 **Q. At this time, are you aware of any other current or anticipated environmental**
6 **statutes or regulations that would cause the termination of the coal supply**
7 **agreement?**

8 A. No.

9 **Q. Does this conclude your direct testimony?**

10 A. Yes.

Application No. 21-08-_____
Exhibit No. PAC/600 - 607
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Direct Testimony of Judith M. Ridenour

PUBLIC VERSION

August 2, 2021

Table of Contents

I.	Witness Qualifications	1
II.	Summary of Testimony.....	1
III.	ECAC Adjustment Rates	3
IV.	Collection of GHG Allowance Costs.....	5
V.	Distribution of GHG Allowance Revenues	6
VI.	Rate Impacts.....	10

Attached Exhibits

Exhibit PAC/601 – Calculation of Proposed ECAC Adjustment Rates

Confidential Exhibit PAC/602 – GHG Allowance Costs to be Recovered in Rates

Exhibit PAC/603 – GHG Allowance Revenue to be Distributed Through the California
Climate Credit

Exhibit PAC/604 – Calculation of Proposed GHG Allowance Costs Surcharge and California
Climate Credit Rates

Confidential Exhibit PAC/605 – Commission Template D-1 – Annual Allowance Revenue
Receipts and Customer Returns

Exhibit PAC/606 – Commission Template D-4 – Forecast Revenue Requirement and
Revenues by Rate Schedule

Exhibit PAC/607 – Effects of Proposed Rate Change Distributed by Rate Schedule

I. Witness Qualifications

1
2 **Q. Please state your name, business address, and position with PacifiCorp d/b/a**
3 **Pacific Power (PacifiCorp or Company).**

4 A. My name is Judith M. Ridenour. My business address is 825 NE Multnomah Street,
5 Suite 2000, Portland, Oregon 97232. My present position is Specialist, Pricing &
6 Cost of Service, in the Regulation Department.

7 **Q. Briefly describe your education and professional background.**

8 A. I hold a Bachelor of Arts degree in Mathematics from Reed College. I joined the
9 Company in the Regulation Department in October 2000.

10 **Q. Please describe your current duties.**

11 A. I am responsible for the preparation of rate spread and rate design used in retail price
12 filings and related analyses. Since 2001, with levels of increasing responsibility, I
13 have analyzed and implemented rate spread and rate design proposals throughout the
14 Company's six-state service territory. I have presented testimony on behalf of the
15 Company in California and Oregon.

16 **II. Summary of Testimony**

17 **Q. Please summarize your direct testimony.**

18 A. I present the proposed rate spread and rate design for the Company's Energy Cost
19 Adjustment Clause (ECAC) rate schedule, greenhouse gas (GHG) allowance cost
20 recovery rate schedule and for the California Climate Credit rate schedule. The
21 proposed ECAC rate spread and rate design are consistent with the methodology first
22 implemented in the Company's 2005 general rate case¹ and used in the Company's

¹ Application (A.) 05-11-022, Decision (D.) 06-12-011.

1 previous ECAC filings. The proposed GHG rate spread and rate design are consistent
2 with Decisions (D.)12-12-033, D.13-12-002 and D.13-12-003 which set forth the
3 Commission's methodologies for collecting GHG allowance costs and distributing
4 GHG allowance revenues to customers. The GHG proposed rate spread and rate
5 design are also consistent with previous GHG filings. The proposed rate spreads and
6 rate designs are based on the 2019 forecast test year, consistent with the Company's
7 most recent general rate case.²

8 The estimated combined effect of the proposed ECAC and GHG cost recovery
9 rates is summarized in the following table:³

Customer Class	Proposed Price Change	
	Dollars	Percent (%)
Residential	-\$901,000	-1.6%
Commercial/Industrial	-\$872,000	-2.3%
Irrigation	-\$270,000	-2.0%
Lighting	\$1,000	0.1%
Overall	-\$2,042,000	-1.9%

10 The table above does not reflect the California Climate Credit. The proposed
11 residential California Climate Credit for 2022 is \$154.58. Consistent with the
12 industry assistance factor applied in 2020 based on D.13-12-002 and applied in 2021
13 based on D.20-10-002, PacifiCorp's application includes a Small Business California

² A.18-04-002

³ Shows effect of proposed rates in comparison to currently effective rates – for the GHG cost recovery rate, this reflects rates approved in D.21-03-007 (2021 Application) and for the ECAC rate, this reflects rates approved in D.20-12-004 (2020 Application).

1 Climate Credit for 2022 which offsets 50 percent of the surcharge Small Business
2 customers will pay in 2022 for GHG cost recovery.⁴

3 **III. ECAC Adjustment Rates**

4 **Q. Please explain the Deferred ECAC adjustment rates.**

5 A. The Deferred ECAC adjustment rates are rates by rate schedule that are calculated
6 based on the Balancing Rate. Deferred ECAC rates for residential, small general
7 service under 20 kilowatts (kW), and lighting schedules are energy-based rates, and
8 Deferred ECAC rates for the general service 20 kW and above and irrigation rate
9 schedules consist of both a demand-based rate and an energy-based rate.

10 **Q. What is the proposed Balancing Rate in this case?**

11 A. As discussed in the direct testimony of Mr. Douglas R. Staples, the proposed
12 Balancing Rate is \$4.25 per megawatt-hour (MWh) or 0.425 cents per kilowatt-hour
13 (kWh).

14 **Q. Have you prepared an exhibit showing the calculation of the proposed Deferred
15 ECAC adjustment rates under the Company's proposal?**

16 A. Yes. Exhibit PAC/601 shows the calculation of the proposed demand- and energy-
17 based Deferred ECAC adjustment rates by rate schedule in rows 14 through 21.

18 **Q. Please explain how the proposed Deferred ECAC adjustment rates by rate
19 schedule are calculated.**

20 A. The Deferred ECAC adjustment rates were calculated using the Balancing Rate for

⁴ A proposed decision was issued on July 15, 2021, in Rulemaking 20-05-002 which may change the California Climate Credit applied to Small Business customers to a per customer biannual credit, similar to the Residential California Climate Credit. If such decision impacts the small business credit for 2022, PacifiCorp will update its proposed 2022 California Climate Credits as directed by the Commission.

1 calendar year 2022. This is consistent with the methodology first implemented in the
2 Company's 2005 general rate case⁵ and used in the Company's previous ECAC
3 filings. The proposed Deferred ECAC rates by rate schedule are derived by first
4 multiplying the proposed Balancing Rate by the total forecast kilowatt-hours (kWh)
5 for each schedule. Those revenues are allocated between demand and energy,
6 consistent with the June 2017 Results of Operations from the Company's most recent
7 general rate case.⁶ Finally, demand and energy rates for each rate schedule are
8 calculated by dividing the appropriate revenue for each function by its corresponding
9 billing quantities, adjusted to account for tariff discounts.

10 **Q. Please explain the Projected ECAC adjustment rates.**

11 A. The Projected ECAC adjustment rates are rates by rate schedule that are calculated
12 based on the Offset Rate. Projected ECAC rates for residential, small general service
13 under 20 kW (kilowatts), and lighting schedules are energy-based rates. Projected
14 ECAC rates for the general service 20 kW and above and irrigation rate schedules
15 consist of both a demand-based rate and an energy-based rate.

16 **Q. What is the proposed Offset Rate in this case?**

17 A. As discussed in the direct testimony of Mr. Staples, the proposed Offset rate is \$25.15
18 per MWh or 2.515 cents per kWh.

19 **Q. Have you prepared an exhibit showing the calculation of the proposed Projected**
20 **ECAC adjustment rates under the Company's proposal?**

21 A. Yes. Exhibit PAC/601 shows the calculation of the proposed demand- and energy-
22 based Projected ECAC adjustment rates by rate schedule in rows 22 through 29.

⁵ A.05-11-022, D.06-12-011.

⁶ A.18-04-002.

1 **Q. Please explain how the proposed Projected ECAC adjustment rates by rate**
2 **schedule are calculated.**

3 A. The Projected ECAC adjustment rates were calculated using the Offset Rate for
4 calendar year 2022. This is consistent with the methodology first implemented in the
5 Company's 2005 general rate case⁷ and used in the Company's previous ECAC
6 filings. The proposed Projected ECAC rates by rate schedule are derived by first
7 multiplying the proposed Offset Rate by the total forecast kWh for each schedule.
8 Those revenues are allocated between demand and energy, consistent with the
9 June 2017 Results of Operations from the Company's most recent general rate case.⁸
10 Finally, demand and energy rates for each rate schedule are calculated by dividing the
11 appropriate revenue for each function by its corresponding billing quantities, adjusted
12 to account for tariff discounts.

13 **IV. Collection of GHG Allowance Costs**

14 **Q. What is the total amount of GHG allowance costs to be recovered in rates in**
15 **2022?**

16 A. The total amount of GHG allowance costs to be recovered in rates in 2022 is
17 \$11,049,309 as shown in Confidential Exhibit PAC/602, line six. This amount
18 consists of the forecast 2022 costs, plus a true up related to actual costs for prior
19 years. The amount has been adjusted to account for franchise fees and uncollectibles
20 at the Company's current factor. The amounts in Confidential Exhibit PAC/602
21 which make up the GHG allowance costs reference the exhibits of other Company
22 witnesses sponsoring those amounts.

⁷ A.05-11-022, D.06-12-011.

⁸ A.18-04-002.

1 **Q. How does the Company propose to collect GHG allowance costs from**
2 **customers?**

3 A. The Company proposes to continue to collect GHG allowance costs through energy-
4 based adjustment rates in Schedule GHG-92, Surcharge to Recover Greenhouse Gas
5 Carbon Pollution Permit Cost (GHG Surcharge) which was first implemented in 2014
6 to collect GHG allowance costs. Consistent with the approved rate spread in the
7 Company's previous GHG proceedings, the Company proposes a rate spread
8 allocated on total present base revenues including net power costs. The GHG
9 allowance costs rate spread and rate design are consistent with D.12-12-033, D.13-12-
10 002 and D.13-12-003, which set forth the Commission's methodologies for collecting
11 GHG allowance costs and distributing GHG allowance revenues to customers.

12 **Q. Have you prepared an exhibit which shows the proposed rates for the GHG**
13 **Surcharge?**

14 A. Yes. Exhibit PAC/604 shows the calculation of proposed rates for the GHG
15 Surcharge. Columns 6 and 7 in the exhibit show the rate spread amongst the
16 customer rate schedules and column 8 shows the proposed surcharge rates.

17 **V. Distribution of GHG Allowance Revenues**

18 **Q. What is the total amount of GHG allowance revenues, net of expenses, to be**
19 **distributed to eligible customers through the California Climate Credit in 2022?**

20 A. The total amount to be distributed to eligible customers through the California
21 Climate Credit in 2022 is \$11,739,478 as shown in Exhibit PAC/603, line 12. This
22 amount consists of the forecast 2022 revenues offset by the forecast 2022
23 administrative and outreach costs for the Cap and Trade program, plus a true up

1 related to actual revenues and administrative and outreach costs for previous years,
2 and, consistent with D.17-12-022 and D.20-04-012, an allowance revenue set aside
3 for the Solar on Multifamily Affordable Housing Program. The amounts have been
4 adjusted to account for franchise fees and uncollectibles at the Company's current
5 factor. The amounts in Exhibit PAC/603 are referenced in the testimony and exhibits
6 of other Company witnesses sponsoring those amounts.⁹

7 **Q. Which customers are eligible to receive a portion of the GHG allowance**
8 **revenues?**

9 A. As ordered in D.12-12-033, three types of customers are eligible to receive a portion
10 of the GHG allowance revenues: Energy-Intensive Trade-Exposed entities (EITE),
11 Residential customers and Small Business customers. For PacifiCorp, Small
12 Business customers are defined in D.13-12-003 as all customers served under
13 Schedule A-25, General Service Less than 20kW, and customers served under
14 Schedule PA-20, Agricultural Pumping Service, with demand which has not exceeded
15 20 kW in more than three months within a 12-month period.

16 **Q. Does PacifiCorp have any EITE customers?**

17 A. No. PacifiCorp is not aware of any EITE entities eligible to receive GHG allowance
18 revenue in its service territory; therefore the total allowance revenue estimated for
19 distribution to EITE customers is \$0.

20 **Q. What methodology is used to distribute the GHG allowance revenues to eligible**
21 **customers?**

⁹ See 'Source' column of Exhibit PAC/603.

1 A. In D.12-12-033, the Commission set forth the methodology for utilities to distribute
2 GHG allowance revenues to customers as an on-bill credit called the California
3 Climate Credit. The credit goes to eligible EITE, Small Business, and Residential
4 customers. As mentioned above, PacifiCorp currently has no EITE customers to
5 receive the credit. In previous applications, Small Business customers received a
6 credit equal to the amount of GHG allowance costs in their rates (the GHG
7 Surcharge) multiplied by the assistance factor for the associated year set forth in
8 Table 2 of Appendix 2 of D. 13-12-002.¹⁰ The final year shown in the table was 2020
9 with an assistance factor of 50 percent. D.20-10-002 directed PacifiCorp to continue
10 to apply a 50 percent assistance factor in 2021. PacifiCorp has continued this 50
11 percent assistance factor for 2022 in this application but seeks guidance on whether
12 the Company should continue to use the assistance factor of 50 percent for future
13 applications. The Small Business credit is applied as a line-item, per kWh credit on
14 customers' monthly bills.¹¹ Per D.12-12-033, PacifiCorp does not have a volumetric
15 residential credit; therefore, the remainder of PacifiCorp's GHG allowance revenue
16 distribution will go to residential customers through a semi-annual, per-household
17 credit as set forth in the decision.

18 **Q. Have you prepared an exhibit which shows the proposed rates for the California**
19 **Climate Credit?**

20 A. Yes. The calculation of the proposed California Climate Credit rates is shown
21 alongside the calculation of the GHG Surcharge rates in Exhibit PAC/604. Column

¹⁰ On July 1, 2014, the California Air Resources Board implemented the delay in assistance factors contemplated in D.13-12-002 resulting in Table 2 of Appendix 2 being the appropriate table for Small Business Assistance Factors used to calculate the California Climate Credit.

¹¹ See footnote 3 above regarding pending changes to the Small Business Climate Credit.

1 10 in the exhibit shows the proposed California Climate Credit rates and column 11
2 shows in dollars the total credit for each eligible customer type.

3 **Q. What is the total amount of the proposed Small Business California Climate**
4 **Credit?**

5 A. The total amount of the proposed Small Business California Climate Credit to be
6 distributed in 2022 based on a 50 percent assistance factor is \$594,532.

7 **Q. What is the total amount of the proposed residential California Climate Credit**
8 **and what is the proposed semi-annual, per-household residential bill credit?**

9 A. The total amount of the proposed residential California Climate Credit to be
10 distributed in 2022 is \$11,144,946. The proposed semi-annual, per-household
11 California Climate Credit is \$154.58. The proposed credits will be distributed to
12 residential customers¹² in April and October 2022 as required by D.13-12-003,
13 resulting in a total per-household distribution of \$309.16 for the year. The proposed
14 semi-annual credit is approximately \$57 more than the 2021 residential credit.

15 **Q. Please explain Confidential Exhibit PAC/605.**

16 A. Confidential Exhibit PAC/605 is the Commission Template D-1, Annual Allowance
17 Revenue Receipts and Customer Returns, adopted in D.14-10-033. The table
18 summarizes forecast and recorded annual amounts related to GHG allowance
19 revenues. The Company witness supporting each section of the table is shown in the
20 exhibit.

¹² Including customers on tariff Schedule D, Schedule DL-6, Schedule DS-8, Schedule DM-9, and residential customers on Schedule NEM-35. Eligible residential customers are defined as customers with an active account receiving electrical service from PacifiCorp at the time the California Climate Credit is distributed. The submetered systems of master metered customers are also eligible to receive the semi-annual California Climate Credit.

VI. Rate Impacts

1

2 **Q. What is the impact of the proposed changes to the ECAC rates?**

3 A. The impact of the proposed change to the ECAC Balancing Rate is a rate decrease of
4 approximately \$2.4 million over the amount collected through present rates. The
5 impact of the proposed change to the ECAC Offset Rate is a rate decrease of
6 approximately \$3.0 million from the amount collected through present rates. Present
7 rates do not reflect ECAC changes proposed in the Company's pending 2021 ECAC
8 application, A.20-08-002.

9 **Q. What is the impact of the proposed changes to the GHG Surcharge rates?**

10 A. The impact of the proposed changes to the GHG Surcharge rates is a rate increase of
11 approximately \$3.4 million.

12 **Q. Please describe Exhibit PAC/606.**

13 A. Exhibit PAC/606 is Commission Template D-4, Forecast Revenue Requirement and
14 Revenues by Rate Schedule. The exhibit summarizes by customer rate schedule the
15 proposed GHG allowance costs to be recovered from customers, the proposed rate per
16 kWh to be applied to customers to recover those costs and the proposed Climate
17 Credit amounts to be distributed to eligible customers. Columns from the template
18 for unbundled customers are not included because PacifiCorp does not have
19 unbundled customers in California.

20 **Q. What are the overall combined effects of the Company's proposed ECAC and**
21 **GHG allowance costs rate change?**

1 A. The overall effects of the proposed ECAC and GHG allowance costs rate change
2 from rates presently in effect are shown in Exhibit PAC/607 and are summarized in
3 the following table:

Customer Class	Proposed Price Change	
	Dollars	Percent (%)
Residential	-\$901,000	-1.6%
Commercial/Industrial	-\$872,000	-2.3%
Irrigation	-\$270,000	-2.0%
Lighting	\$1,000	0.1%
Overall	-\$2,042,000	-1.9%

4 The rate impacts shown in the exhibit and the table exclude the effects of the
5 California Climate Credit.

6 **Q. Please describe Exhibit PAC/607.**

7 A. Exhibit PAC/607 shows the effects of the Company's proposed combined ECAC and
8 GHG cost recovery rate change by rate schedule. Columns 5 through 9 show present
9 revenues. Present base revenues are shown in column 5. Present Projected ECAC
10 revenues are shown in column 6. Column 7 adds columns 5 and 6 for total present
11 base revenues including Projected ECAC. The adders in column 8 include revenues
12 for adjustment schedules that are not a part of base revenues including the present
13 Deferred ECAC and present GHG Surcharge. Column 9 adds columns 7 and 8 to
14 show present revenues net of adders. Pass through adjustments such as the Surcharge
15 to Fund Residential California Alternative Rates for Energy (CARE), CARE
16 discounts, and the California Climate Credit are excluded from revenues in this table.

17 Similarly, for proposed revenues, columns 10 through 14 show the base
18 proposed revenues, proposed Projected ECAC revenues, proposed total base revenues
19 with Projected ECAC, proposed adders including the proposed Deferred ECAC and

1 proposed GHG Surcharge, and proposed net revenues. The proposed base rate
2 change in dollars and percentage is shown by rate schedule in columns 15 and 16.
3 The proposed net rate change in dollars and percentage is shown by rate schedule in
4 columns 17 and 18.

5 **Q. Does this conclude your direct testimony?**

6 **A. Yes.**

Application No. 21-08-_____
Exhibit No. PAC/601
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Calculation of Proposed ECAC Adjustment Rates

August 2, 2021

Exhibit PAC/601
PACIFICORP
STATE OF CALIFORNIA
CALCULATION OF PROPOSED ECAC ADJUSTMENT RATES

California Results of Operations June 2017
Net Power Costs
FERC Account Basis for Allocation of ECAC

Line No.	FERC ACCT	Description	PTFA Factor	CALIFORNIA Normalized ¹	Production	Transmission	Demand %	Production Demand	Production Energy	Transmission Demand	Transmission Energy
1	447	Revenue Credits Sales for Resale Expenses	SG	\$3,066,538	\$3,366,538	\$0	75%	\$2,299,903	\$766,634	\$0	\$0
2	501	Fuel Related	SE	\$11,495,032	\$11,495,032	\$0	0%	\$0	\$11,495,032	\$0	\$0
3	503	Steam From Other Sources	SE	\$68,933	\$68,933	\$0	0%	\$0	\$68,933	\$0	\$0
4	547	Fuel	SE	\$3,461,054	\$3,461,054	\$0	0%	\$0	\$3,461,054	\$0	\$0
5	555	Purchased Power	SG	\$8,342,037	\$8,342,037	\$0	75%	\$6,256,528	\$2,085,509	\$0	\$0
6	555	Purchased Power	SE	\$114,887	\$114,887	\$0	0%	\$0	\$114,887	\$0	\$0
7	555	Purchased Power	SSGC	\$0	\$0	\$0	75%	\$0	\$0	\$0	\$0
8	565	Transmission of Electricity by Others	SG	\$2,036,319	\$0	\$2,036,319	75%	\$0	\$0	\$1,527,239	\$509,080
9	565	Transmission of Electricity by Others	SE	\$36,804	\$0	\$36,804	0%	\$0	\$0	\$0	\$36,804
10		Total NPC Accounts		\$22,488,526	\$20,415,405	\$2,073,123		\$3,956,625	\$16,458,780	\$1,527,239	\$545,884
11		Total NPC Factors						18%	73%	7%	2%

CALCULATION OF ECAC ADJUSTMENT RATES

12 Balancing Rate: 0.425 ¢/kWh
13 Offset Rate: 2.515 ¢/kWh

Class / Schedule	Description	Forecast 2019	Balancing	Total Deferred	Deferred Revenues by ECAC Factor				Effective	Effective	Deferred ECAC	
		KWH (1)	Rate (2)	Revenues (3) (1)x(2)	Production Demand (4) 18%	Production Energy (5) 73%	Transmission Demand (6) 7%	Transmission Energy (7) 2%	kWh ¹ (8)	kWh ¹ (9)	Rate per kW (10) [(4)+(6)]/(8)	Rate per kWh (11) [(5)+(7)]/(9) ²
14	D/DS-S/DM-9 Residential Service	369,549,678	\$0.00425	\$1,570,586	\$276,328	\$1,149,472	\$106,662	\$38,124		369,233,274		0.425 ¢
15	A-25 Small General Service - < 20 kW	51,917,769	\$0.00425	\$220,651	\$38,821	\$191,498	\$14,985	\$5,356		51,916,281		0.425 ¢
16	A-32 Small General Service - 20 kW & Over	67,115,084	\$0.00425	\$285,239	\$50,185	\$208,759	\$19,371	\$6,924	345,240	67,113,000	\$0.20	0.321 ¢
17	A-36 Large General Service - 100 kW & Over	80,107,394	\$0.00425	\$340,456	\$59,900	\$249,171	\$23,121	\$8,264	196,263	80,095,236	\$0.42	0.321 ¢
18	AT-48 Large General Service - 500 kW & Over	81,372,934	\$0.00425	\$345,835	\$60,846	\$253,108	\$23,486	\$8,395	208,998	81,121,286	\$0.40	0.322 ¢
19	PA-20 Agricultural Pumping Service	94,292,504	\$0.00425	\$400,743	\$70,507	\$293,294	\$27,215	\$9,728	420,637	94,292,504	\$0.23	0.321 ¢
20	Total Lighting	3,104,619	\$0.00425	\$13,195	\$2,321	\$9,557	\$896	\$320		3,104,619		0.425 ¢
21	Total	747,460,012		\$3,176,705	\$558,908	\$2,324,949	\$215,736	\$77,111	1,171,138	746,876,199		

Class / Schedule	Description	Forecast 2019	Offset	Total Projected	Projected Revenues by ECAC Factor				Effective	Effective	Projected ECAC	
		KWH (1)	Rate (2)	Revenues (3) (1)x(2)	Production Demand (4) 18%	Production Energy (5) 73%	Transmission Demand (6) 7%	Transmission Energy (7) 2%	kWh ¹ (8)	kWh ¹ (9)	Rate per kW (10) [(4)+(6)]/(8)	Rate per kWh (11) [(5)+(7)]/(9) ²
22	D/DS-S/DM-9 Residential Service	369,549,673	\$3.02515	\$9,294,174	\$1,635,214	\$6,802,169	\$631,185	\$225,606		369,233,274		2.517 ¢
23	A-25 Small General Service - < 20 kW	51,917,769	\$3.02515	\$1,305,732	\$229,730	\$955,632	\$88,675	\$31,695		51,916,281		2.515 ¢
24	A-32 Small General Service - 20 kW & Over	67,115,084	\$3.02515	\$1,687,945	\$296,976	\$1,235,364	\$114,632	\$40,973	345,240	67,113,000	\$1.19	1.902 ¢
25	A-36 Large General Service - 100 kW & Over	80,107,394	\$3.02515	\$2,014,701	\$354,466	\$1,474,508	\$136,622	\$48,905	196,263	80,095,236	\$2.57	1.902 ¢
26	AT-48 Large General Service - 500 kW & Over	81,372,934	\$3.02515	\$2,046,529	\$360,065	\$1,497,803	\$138,984	\$49,677	208,998	81,121,286	\$2.39	1.908 ¢
27	PA-20 Agricultural Pumping Service	94,292,504	\$3.02515	\$2,371,456	\$417,233	\$1,735,609	\$161,050	\$57,564	420,637	94,292,504	\$1.37	1.902 ¢
28	Total Lighting	3,104,619	\$3.02515	\$78,081	\$13,738	\$57,146	\$5,303	\$1,895		3,104,619		2.515 ¢
29	Total	747,460,012		\$18,798,619	\$3,307,423	\$13,758,230	\$1,276,650	\$456,316	1,171,138	746,876,199		

Total ECAC Adjustment Deferred plus Projected	
Demand Rate per kW (12) Sum of (10)	Energy Rate per kWh (13) Sum of (11)
	2.942 ¢
	2.940 ¢
\$1.39	2.223 ¢
\$2.92	2.223 ¢
\$2.76	2.230 ¢
\$1.60	2.223 ¢
	2.940 ¢

Notes:
1 Billing determinants adjusted for primary discounts, employee discounts and easement discounts.
2 Energy rates for all schedules not billed on demand are designed to collect the total ECAC revenues for that schedule.

Application No. 21-08-_____
Exhibit No. PAC/602
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

GHG Allowance Costs to be Recovered in Rates

CONFIDENTIAL

August 2, 2021

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Exhibit PAC/602
PACIFICORP
STATE OF CALIFORNIA
GHG Allowance Costs to be Recovered in Rates
August 2, 2021

Line No.	Description	Forecast	Source
1	GHG Allowance Costs		
2	2022		Confidential Exhibit PAC/202
3	Gross up for Franchise Fees and Uncollectibles Expense ⁽¹⁾		
4	Subtotal Recorded/Forecast Costs		
5	Greenhouse Gas Allowance Costs Sub-balancing Account Under / (Over) Collection		Confidential Exhibit PAC/203
6	GHG Allowance Costs to be Recovered in Rates	<u>\$ 11,049,309</u>	line 4 + line 5

(1)Factor of 97.977602%

Application No. 21-08-_____
Exhibit No. PAC/603
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

GHG Allowance Revenue to be Distributed Through the California Climate Credit

August 2, 2021

Exhibit PAC/603
PACIFICORP
STATE OF CALIFORNIA
GHG Allowance Revenue to be Distributed Through the California Climate Credit

Line No.	Description	Forecast for Climate Credit	Source
1	GHG Allowance Revenues		
2	2022	\$ (10,661,475)	Exhibit PAC/208
3	Gross up for Franchise Fees and Uncollectibles Expense ⁽¹⁾	\$ (215,617)	
4	Subtotal Recorded/Forecast Revenues	\$ (10,877,092)	
5	Greenhouse Gas Allowance Revenue Balancing Account (Under) / Over	\$ (2,015,253)	Exhibit PAC/207
6	Forecast Expenses - 2022		
7	GHG Outreach and Education Costs	\$ 80,000	Exhibit PAC/303
8	GHG Administrative Costs	\$ 5,000	Exhibit PAC/402
9	Gross up for Franchise Fees and Uncollectibles Expense ⁽¹⁾	\$ 1,719	
10	Subtotal Forecast Expenses	\$ 86,719	
11	Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs ⁽²⁾	\$ 1,066,147	Line 2 * 10%
12	Net GHG Allowance Revenues Available for Return	\$ (11,739,478)	Line 4 + Line 5 + Line 10 + Line 11
13	Summary of California Climate Credit Distribution		
14	EITE Customers	\$ -	
15	Small Business Volumetric Return (Forecast)	\$ (594,532)	Exhibit PAC/604
16	Subtotal Volumetric Return	\$ (594,532)	
17	Total Revenue Available for Residential Climate Credit	\$ (11,144,946)	Exhibit PAC/604
18	Estimated Number of Households Eligible for Climate Credit	36,049	Exhibit PAC/604
19	Semi-Annual Residential Climate Credit	\$ (154.58)	Exhibit PAC/604

(1) Factor of 97.977602%

(2) Commission Decision (D.) 17-12-022 Ordering Paragraph 5 requires PacificCorp to reserve 10% of the proceeds from the sale of greenhouse gas proceeds for use in the Solar on Multifamily Affordable Housing Program. The set aside started mid-year in 2016 when the company was directed to set aside 5% for half of 2016 and 10% annually thereafter.

Application No. 21-08-_____
Exhibit No. PAC/604
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Calculation of Proposed GHG Allowance Costs Surcharge and California Climate Credit Rates

August 2, 2021

**Exhibit PAC/604
PACIFICORP
STATE OF CALIFORNIA
CALCULATION OF PROPOSED GHG ALLOWANCE COSTS SURCHARGE AND CLIMATE CREDIT RATES**

Forecast 12 Months Ending December 2019

Line No.	Description	Sch.	No. of Customers ¹	KWH	Present Revenues	2022 GHG Allowance Costs Surcharge			2022 Climate Credit		
						Cost Allocation	Costs	Rate ¢/kWh	2022 Asst. Factor ²	Credit Rate	Revenue Distribution
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Residential											
1	Residential Service	D/DL-6	35,838	368,139,171	\$51,491,651		\$5,769,373				(\$11,079,714)
2	Multi-Family - Master Metered	DM-9	28	166,767	\$22,021		\$2,614				(\$8,656)
3	Multi-Family - Submetered	DS-8	183	1,243,740	\$144,333		\$19,492				(\$56,576)
4	Total Residential		36,049	369,549,678	\$51,658,005	52.39%	\$5,791,478	1.567	\$ (309.16)		(\$11,144,946) <i>annual amount</i>
									\$ (154.58)		<i>semi-annually, per customer</i>
Commercial & Industrial											
5	General Service - < 20 kW	A-25	7,131	51,917,789	\$8,682,837	8.81%	\$973,450	1.875	50%	-0.938	(\$486,989) ¢/kWh
6	General Service - 20 kW & Over	A-32	1,125	67,115,094	\$9,240,772	9.37%	\$1,036,001	1.544			
7	General Service - 100 kW & Over	A-36	191	80,107,394	\$8,926,736	9.05%	\$1,000,794	1.249			
8	Large General Service - 500 kW & Over	AT-48	19	81,372,934	\$7,239,603	7.34%	\$811,646	0.997			
9	Agricultural Pumping Service - Under 20 kW	PA-20	1,002	14,833,487	\$12,197,124	12.37%	\$1,367,443	1.450	50%	-0.725	(\$107,543) ¢/kWh
10	Agricultural Pumping Service - Over 20 kW	PA-20	1,024	79,459,017							
11	Total Commercial & Industrial		10,491	374,805,715	\$46,287,073		\$5,189,333				(\$594,532)
Lighting											
12	Outdoor Area Lighting Service	OL-15	760	913,538	\$217,305	0.22%	\$24,362	2.667			
13	Airway & Athletic Lighting	OL-42	36	154,197	\$29,557	0.03%	\$3,314	2.149			
14	Street Lighting, Utility Owned	LS-51	78	845,623	\$235,151	0.24%	\$26,363	3.118			
15	Street Lighting, Cust. Owned Energy Only	LS-53	105	1,138,821	\$163,661	0.17%	\$18,348	1.611			
16	Street Lighting, Customer Owned	LS-58	20	52,440	\$8,967	0.01%	\$1,005	1.917			
17	Total Lighting		999	3,104,619	\$654,641		\$73,393				
18	Total Sales to Ultimate Consumers		47,539	747,460,012	\$98,599,719		\$11,054,204				(\$11,739,478)
19	Total AGA				\$194,473						
20	Total Employee Discount		87	1,249,540	(\$43,433)		(\$4,895)				
21	Total Sales (inc. AGA and Employee Discount)		47,539	747,460,012	\$98,750,759		\$11,049,309				(\$11,739,478)

Notes:

- 1 Customer counts for Schedules DM-9 and DS-8 adjusted to reflect submeter and tenant counts.
- 2 Based on the Small Business Assistance Factor shown in Table 2 of Appendix 2 of D.13-12-C02.

Application No. 21-08-_____
Exhibit No. PAC/605
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Commission Template D-1 – Annual Allowance Revenue Receipts and Customer Returns

CONFIDENTIAL

August 2, 2021

CONFIDENTIAL
Exhibit PAC/605
PACIFICORP
STATE OF CALIFORNIA
Commission Template D-1
Annual Allowance Revenue Receipts and Customer Returns
August 2, 2021

Line	Description	2013		2014		2015		2016		20
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast
1	Proxy GHG Price (\$/MT)	N/A	N/A	N/A	N/A	\$ 12.26	N/A	\$ 13.08	N/A	\$ 13.05
2	Allocated Allowances (MT)	723,725	723,726	728,106	728,106	730,526	730,528	737,440	737,440	745,624
3	Revenues									
4	Prior Balance	N/A	N/A	(9,045,316)	(9,106,055)	(2,668,895)	(3,219,781)	(1,373,502)	(1,190,504)	478,475
5	Allowance Revenue	(9,096,948)	(9,096,948)		(8,518,840)	(8,956,249)	(9,085,917)	(9,545,715)	(9,387,611)	(9,730,393)
6	Interest	(6,868)	(10,510)		(6,331)	-	224		4,365	
7	Franchise Fees and Uncollectibles	-	-		(319,722)	(245,001)	(164,746)	(174,900)	(170,141)	(176,436)
8	Subtotal Revenues	(9,103,816)	(9,107,458)		(17,950,948)	(11,870,145)	(12,470,220)	(11,694,118)	(10,743,892)	(9,428,354)
9	Expenses									
10	Outreach and Administrative Expenses	58,500	1,403	110,000	57,941	115,000	66,328	87,500	87,672	92,000
11	Franchise Fees and Uncollectibles	-	-	-	-	-	1,203	1,587	1,590	1,668
12	Interest	-	-	-	-	-	-	-	-	-
13	Subtotal Expenses	58,500	1,403	110,000	57,941	115,000	67,531	89,087	89,262	93,668
14	Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (Note 1)	-	-	-	-	-	-	-	469,381	973,039
15	Net GHG Revenues (Line 8 + Line 13 + Line 14)	(9,045,316)	(9,106,055)		(17,893,007)	(11,755,145)	(12,402,689)	(11,605,031)	(10,185,249)	(8,361,647)
16	GHG Revenues to be Distributed in Future Years	-	-		-	-	-	-	-	-
17	Net GHG Revenues Available for Customers in Forecast Year (Line 15 + Line 16)	(9,045,316)	(9,106,055)		(17,893,007)	(11,755,145)	(12,402,689)	(11,605,031)	(10,185,249)	(8,361,647)
18	GHG Revenue Returned to Eligible Customers									
19	EITE Customer Return	-	-		-	-	-	-	-	-
20	Small Business Volumetric Return	-	-		864,015	1,382,690	1,211,183	1,053,331	961,468	496,448
21	Residential Volumetric Return	-	-		-	-	-	-	-	-
22	Subtotal EITE + Volumetric Returns	-	-		864,015	1,382,690	1,211,183	1,053,331	961,468	496,448
23	Number of Households Eligible for the California Climate Credit	-	-		35,523	36,774	35,457	36,774	35,670	36,774
24	Per-Household Semi-Annual Climate Credit (0.5 x (Line 17 + 22) x Line 23)	N/A	N/A	194.37	194.37	141.03	141.03	143.47	143.47	106.94
25	Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	-	-		13,809,211	10,372,455	10,001,001	10,551,700	10,235,150	7,865,198
26	Total Revenue Distributed				14,673,226		11,212,185		11,196,618	
27	Revenue Balance	N/A	(9,106,055)	N/A	(3,219,781)	N/A	(1,190,504)	N/A	1,011,368	N/A

Note 1: Commission Decision (D.) 17-12-022 Ordering Paragraph 5 requires PacificCorp to reserve 10% of the proceeds from the sale of greenhouse gas proceeds for use in the Solar on Multifamily Affordable Housing Program. The set aside started mid-year in 2016 when the company was directed to set aside 5% for half of 2016 and 10% annually thereafter. In 2020 set aside was cut to half for the six months (January through June 2020) that had been approved at the time of the 2020 ratesetting in D.20-05-011. Per D.20-04-012, the remaining half of the setaside for July through December has been approved and is to be set aside from 2021 proceeds.

CONFIDENTIAL INFORMATION

CONFIDENTIAL
Exhibit PAC/605
PACIFICORP
STATE OF CALIFORNIA
Commission Template D-1
Annual Allowance Revenue Receipts and Customer Returns
August 2, 2021

Line	Description	17 Recorded
1	Proxy GHG Price (\$/MT)	N/A
2	Allocated Allowances (MT)	745,624
3	Revenues	
4	Prior Balance	1,011,368
5	Allowance Revenue	(10,681,011)
6	Interest	9,052
7	Franchise Fees and Uncollectibles	(193,509)
8	Subtotal Revenues	(9,854,099)
9	Expenses	
10	Outreach and Administrative Expenses	60,623
11	Franchise Fees and Uncollectibles	1,099
12	Interest	-
13	Subtotal Expenses	61,722
14	Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (Note 1)	1,068,101
15	Net GHG Revenues (Line 8 + Line 13 + Line 14)	(8,724,276)
16	GHG Revenues to be Distributed in Future Years	-
17	Net GHG Revenues Available for Customers in Forecast Year (Line 15 + Line 16)	(8,724,276)
18	GHG Revenue Returned to Eligible Customers	
19	EITE Customer Return	
20	Small Business Volumetric Return	466,376
21	Residential Volumetric Return	
22	Subtotal EITE + Volumetric Returns	466,376
23	Number of Households Eligible for the California Climate Credit	35,752
24	Per-Household Semi-Annual Climate Credit (0.5 x (Line 17 + 22) ÷ Line 23)	106.94
25	Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	7,646,638
26	Total Revenue Distributed	8,113,014
27	Revenue Balance	(611,262)

Note 1: Commission Decision (D.) 17-12-022 Ordering Paragraph 5 requires PacifiCorp to reserve 10% of the proceeds from the sale of greenhouse gas proceeds for use in the Solar on Multifamily Affordable Housing Program. The set aside started mid-year in 2016 when the company was directed to set aside 5% for half of 2016 and 10% annually thereafter. In 2020 set aside was cut to half for the six months (January through June 2020) that had been approved at the time of the 2020 ratesetting in D.20-05-011. Per D.20-04-012, the remaining half of the setaside for July through December has been approved and is to be set aside from 2021 proceeds.

CONFIDENTIAL INFORMATION

CONFIDENTIAL
Exhibit PAC/605
PACIFICORP
STATE OF CALIFORNIA
Commission Template D-1
Annual Allowance Revenue Receipts and Customer Returns
August 2, 2021

Line	Description	2018		2019		2020		2021	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1	Proxy GHG Price (\$/MT)	\$ 14.12	N/A	\$ 15.95	N/A	\$ 17.83	N/A	\$ 16.47	N/A
2	Allocated Allowances (MT)	752,553	752,553	759,349	759,349	767,732	767,732	551,045	549,673
3	Revenues								
4	Prior Balance	(199,575)	(611,262)	(995,401)	(1,289,566)	565,714	(931,159)	216,521	(713,632)
5	Allowance Revenue	(10,626,048)	(11,216,803)	(12,111,617)	(12,783,641)	(13,688,662)	(13,082,153)	(9,075,711)	(10,116,732)
6	Interest		(28,545)		(55,368)		(20,477)		(17,911)
7	Franchise Fees and Uncollectibles	(192,676)	(203,906)	(244,945)	(259,656)	(276,839)	(264,987)	(183,547)	(204,963)
8	Subtotal Revenues	(11,018,299)	(12,060,515)	(13,351,963)	(14,388,231)	(13,399,787)	(14,298,776)	(9,042,737)	(11,053,237)
9	Expenses								
10	Outreach and Administrative Expenses	90,000	70,705	79,500	72,625	80,100	79,703	85,600	85,000
11	Franchise Fees and Uncollectibles	1,632	1,282	1,608	1,469	1,620	1,612	1,731	1,719
12	Interest	-	-	-	-	-	-	-	-
13	Subtotal Expenses	91,632	71,987	81,108	74,094	81,720	81,320	87,331	86,719
14	Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (Note 1)	1,062,605	1,121,680	1,211,162	1,278,364	895,140	864,815	1,561,679	1,665,781
15	Net GHG Revenues (Line 8 + Line 13 + Line 14)	(9,864,062)	(10,866,848)	(12,059,694)	(13,035,773)	(12,422,927)	(13,352,642)	(7,393,727)	(9,300,738)
16	GHG Revenues to be Distributed in Future Years	-	-	-	-	-	-	-	-
17	Net GHG Revenues Available for Customers in Forecast Year (Line 15 + Line 16)	(9,864,062)	(10,866,848)	(12,059,694)	(13,035,773)	(12,422,927)	(13,352,642)	(7,393,727)	(9,300,738)
18	GHG Revenue Returned to Eligible Customers								
19	EITE Customer Return	-	-	-	-	-	-	-	-
20	Small Business Volumetric Return	531,084	480,075	547,880	562,070	366,984	468,938	409,556	403,561
21	Residential Volumetric Return	-	-	-	-	-	-	-	-
22	Subtotal EITE + Volumetric Returns	531,084	480,075	547,880	562,070	366,984	468,938	409,556	403,561
23	Number of Households Eligible for the California Climate Credit	36,774	35,844	36,049	36,145	36,049	36,389	36,049	35,401
24	Per-Household Semi-Annual Climate Credit (0.5 x (Line 17 + 22) ÷ Line 23)	126.90	126.90	159.67	159.67	167.22	167.22	96.87	97.20
25	Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	9,332,978	9,097,207	11,511,814	11,542,544	12,055,943	12,170,072	6,984,171	6,881,924
26	Total Revenue Distributed		9,577,282		12,104,614		12,639,010		7,285,485
27	Revenue Balance	N/A	(1,289,566)	N/A	(931,159)	N/A	(713,632)	N/A	(2,015,253)

Note 1: Commission Decision (D.) 17-12-022 Ordering Paragraph 5 requires PacificCorp to reserve 10% of the proceeds from the sale of greenhouse gas proceeds for use in the Solar on Multifamily Affordable Housing Program. The set aside started mid-year in 2016 when the company was directed to set aside 5% for half of 2016 and 10% annually thereafter. In 2020 set aside was cut to half for the six months (January through June 2020) that had been approved at the time of the 2020 ratesetting in D.20-05-011. Per D.20-04-012, the remaining half of the setaside for July through December has been approved and is to be set aside from 2021 proceeds.

CONFIDENTIAL INFORMATION

CONFIDENTIAL
Exhibit PAC/605
PACIFICORP
STATE OF CALIFORNIA
Commission Template D-1
Annual Allowance Revenue Receipts and Customer Returns
August 2, 2021

Line	Description	2022		Support
		Forecast	Recorded	
1	Proxy GHG Price (\$/MT)	\$ 19,36		
2	Allocated Allowances (MT)	550,696		Testimony and Exhibits of Mary M. Wiencke PAC/200-209
3	Revenues			
4	Prior Balance	(2,015,253)		
5	Allowance Revenue	(10,661,475)		
6	Interest			
7	Franchise Fees and Uncollectibles	(215,617)		
8	Subtotal Revenues	(12,892,345)		
9	Expenses			Testimony and Exhibits of Ashley Rask & Anthony B. Worthington PAC/300-304 and PAC/400-403
10	Outreach and Administrative Expenses	85,000		
11	Franchise Fees and Uncollectibles	1,719		
12	Interest	-		
13	Subtotal Expenses	86,719		
14	Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (Note 1)	1,066,147		T&E of J.M.R. PAC/600-607
15	Net GHG Revenues (Line 8 + Line 13 + Line 14)	(11,739,478)		
16	GHG Revenues to be Distributed in Future Years	-		
17	Net GHG Revenues Available for Customers in Forecast Year (Line 15 + Line 16)	(11,739,478)		
18	GHG Revenue Returned to Eligible Customers			Testimony and Exhibits of Judith M. Ridenour PAC/600-607
19	EITE Customer Return	-		
20	Small Business Volumetric Return	594,532		
21	Residential Volumetric Return	-		
22	Subtotal EITE + Volumetric Returns	594,532		
23	Number of Households Eligible for the California Climate Credit	36,049		
24	Per-Household Semi-Annual Climate Credit (0.5 x (Line 17 + 22) ÷ Line 23)	154.58		
25	Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	11,144,946		
26	Total Revenue Distributed			T&E of M.M.W. PAC/200-209
27	Revenue Balance		N/A	

Note 1: Commission Decision (D.) 17-12-022 Ordering Paragraph 5 requires PacifiCorp to reserve 10% of the proceeds from the sale of greenhouse gas proceeds for use in the Solar on Multifamily Affordable Housing Program. The set aside started mid-year in 2016 when the company was directed to set aside 5% for half of 2016 and 10% annually thereafter. In 2020 set aside was cut to half for the six months (January through June 2020) that had been approved at the time of the 2020 ratesetting in D.20-05-011. Per D.20-04-012, the remaining half of the setaside for July through December has been approved and is to be set aside from 2021 proceeds.

CONFIDENTIAL INFORMATION

Application No. 21-08-_____
Exhibit No. PAC/606
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Commission Template D-4 – Forecast Revenue Requirement and Revenues by Rate Schedule

August 2, 2021

Exhibit PAC/606
PACIFICORP
STATE OF CALIFORNIA
Commission Template D-4
Forecast Revenue Requirement and Revenues by Rate Schedule

Bundled Customers					
Line	Rate Schedule (A)	Forecast Sales (kWh) (B)	Forecast GHG Revenue Requirement (\$) (C)	Rate Impact (\$/kWh) (D)	Forecast GHG Revenue (\$) (E)
1	D/DL-6/DM-9/DS-8	369,549,678	\$5,786,583	\$0.01567	(\$11,144,946)
2	A-25	51,917,789	\$973,450	\$0.01875	(\$486,989)
3	A-32	67,115,094	\$1,036,001	\$0.01544	
4	A-36	80,107,394	\$1,000,794	\$0.01249	
5	AT-48	81,372,934	\$811,646	\$0.00997	
6	PA-20	94,292,504	\$1,367,443	\$0.01450	(\$107,543)
7	OL-15	913,538	\$24,362	\$0.02667	
8	OL-42	154,197	\$3,314	\$0.02149	
9	LS-51	845,623	\$26,363	\$0.03118	
10	LS-53	1,138,821	\$18,348	\$0.01611	
11	LS-58	52,440	\$1,005	\$0.01917	
12	Total	747,460,012	\$11,049,309		(\$11,739,478)

Note: This template does not include columns F through I as PacifiCorp does not have any unbundled customers

Application No. 21-08-_____
Exhibit No. PAC/607
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2022 ECAC

Effects of Proposed Rate Change Distributed by Rate Schedule

August 2, 2021

PACIFICORP
STATE OF CALIFORNIA
ESTIMATED EFFECTS OF PROPOSED RATE CHANGE
DISTRIBUTED BY RATE SCHEDULE
Forecast 12 Months Ending December 2019

Line No.	Description	Pres. Sch.	No. of Customers	KWH	Present Revenues				Proposed Revenues				Proposed Change		Net Proposed Change		Line No.		
	(1)	(2)	(3)	(4)	Base Revenue (5)	ECAC (6)	Base with ECAC (7) (5)+(6)	Adders ¹ (8)	Net Revenue (9) (7)+(8)	Base Revenue (10)	ECAC (11)	Base with ECAC (12) (10)+(11)	Adders ¹ (13)	Net Revenue (14) (12)+(13)	Revenue (15) (12)-(7)	Percent (16) (15)/(7)	Revenue (17) (14)-(9)	Percent (18) (17)/(9)	No.
Residential																			
1	Residential Service	D/DL-6	35,838	368,139,171	\$40,727,379	\$10,764,272	\$51,491,651	\$4,421,306	\$55,912,957	\$40,727,379	\$9,265,961	\$49,993,340	\$5,021,365	\$55,014,705	(\$1,498,311)	-2.9%	(\$898,252)	-1.6%	1
2	Multi-Family - Master Metered	DM-9	7	166,767	\$17,145	\$4,876	\$22,021	\$2,002	\$24,023	\$17,145	\$4,198	\$21,343	\$2,274	\$23,617	(\$678)	-3.1%	(\$406)	-1.7%	2
3	Multi-Family - Submetered	DS-8	16	1,243,740	\$107,866	\$36,367	\$144,333	\$14,938	\$159,271	\$107,866	\$31,305	\$139,271	\$16,965	\$156,236	(\$5,062)	-3.5%	(\$3,035)	-1.9%	3
4	Total Residential		35,861	369,549,678	\$40,852,490	\$10,805,515	\$51,658,005	\$4,438,246	\$56,096,251	\$40,852,490	\$9,301,464	\$50,153,954	\$5,040,604	\$55,194,558	(\$1,504,051)	-2.9%	(\$901,693)	-1.6%	4
Commercial & Industrial																			
5	General Service - < 20 kW	A-25	7,131	51,917,789	\$7,166,362	\$1,516,475	\$8,682,837	\$667,124	\$9,349,961	\$7,166,362	\$1,305,694	\$8,472,056	\$805,223	\$9,277,279	(\$210,781)	-2.4%	(\$72,682)	-0.8%	5
6	General Service - 20 kW & Over	A-32	1,125	67,115,094	\$7,281,814	\$1,958,958	\$9,240,772	\$806,154	\$10,046,926	\$7,281,814	\$1,687,325	\$8,969,139	\$907,959	\$9,877,098	(\$271,633)	-2.9%	(\$169,826)	-1.7%	6
7	General Service - 100 kW & Over	A-36	191	80,107,394	\$6,586,308	\$2,340,428	\$8,926,736	\$893,684	\$9,820,420	\$6,586,308	\$2,014,070	\$8,600,378	\$940,249	\$9,540,627	(\$326,359)	-3.7%	(\$279,794)	-2.8%	7
8	Large General Service - 500 kW & Over	AT-48	19	81,372,934	\$4,863,032	\$2,376,571	\$7,239,603	\$847,655	\$8,087,258	\$4,863,032	\$2,047,300	\$6,910,332	\$826,671	\$7,737,003	(\$329,271)	-4.5%	(\$350,255)	-4.3%	8
9	Agricultural Pumping Service	PA-20	2,026	94,292,504	\$9,441,184	\$2,755,940	\$12,197,124	\$1,101,242	\$13,298,366	\$9,441,184	\$2,369,716	\$11,810,900	\$1,217,885	\$13,028,785	(\$386,225)	-3.2%	(\$269,582)	-2.0%	9
10	Total Commercial & Industrial		10,491	374,805,715	\$35,338,700	\$10,948,373	\$46,287,073	\$4,315,859	\$50,602,932	\$35,338,700	\$9,424,104	\$44,762,804	\$4,687,987	\$49,450,791	(\$1,524,269)	-3.3%	(\$1,142,141)	-2.3%	10
Lighting																			
11	Outdoor Area Lighting Service	OL-15	760	913,538	\$190,813	\$26,892	\$217,305	\$15,190	\$232,495	\$190,813	\$22,971	\$213,584	\$20,018	\$233,602	(\$3,721)	-1.7%	\$1,107	0.5%	11
12	Alway & Athletic Lighting	OL-42	36	154,197	\$25,053	\$4,504	\$29,557	\$1,950	\$31,507	\$25,053	\$3,878	\$28,931	\$2,501	\$31,432	(\$626)	-2.1%	(\$75)	-0.2%	12
13	Street Lighting, Utility Owned	LS-51	78	845,623	\$210,393	\$24,758	\$235,151	\$17,116	\$252,267	\$210,393	\$21,305	\$231,698	\$22,846	\$254,544	(\$3,453)	-1.5%	\$2,277	0.9%	13
14	Street Lighting, Cust. Owned Energy Only	LS-53	105	1,138,821	\$130,338	\$33,323	\$163,661	\$9,794	\$173,455	\$130,338	\$28,679	\$159,017	\$11,852	\$170,869	(\$4,644)	-2.8%	(\$2,586)	-1.5%	14
15	Street Lighting, Customer Owned	LS-58	20	52,440	\$7,436	\$1,531	\$8,967	\$567	\$9,534	\$7,436	\$1,319	\$8,755	\$713	\$9,468	(\$212)	-2.4%	(\$66)	-0.7%	15
16	Total Lighting		999	3,104,619	\$563,633	\$90,808	\$654,641	\$44,617	\$699,258	\$563,633	\$78,152	\$641,865	\$57,930	\$699,815	(\$12,656)	-1.9%	\$657	0.1%	16
17	Total Sales to Ultimate Consumers		47,351	747,460,012	\$76,755,023	\$21,844,696	\$98,599,719	\$8,798,722	\$107,398,441	\$76,755,023	\$18,803,720	\$95,558,743	\$9,796,521	\$105,355,264	(\$3,040,576)	-3.1%	(\$2,043,177)	-1.9%	17
18	Total AGA				\$194,473		\$194,473		\$194,473	\$194,473		\$194,473		\$194,473	\$0	0.0%	\$0	0.0%	18
19	Total Employee Discount				(\$34,299)	(\$9,134)	(\$43,433)	(\$3,751)	(\$47,184)	(\$34,299)	(\$7,862)	(\$42,161)	(\$4,261)	(\$46,422)	\$1,272	-2.9%	\$762	-1.6%	19
20	Total Sales (inc. AGA and Employee Discount)		47,351	747,460,012	\$76,915,198	\$21,835,562	\$98,750,759	\$8,794,971	\$107,545,730	\$76,915,198	\$18,795,858	\$95,711,056	\$9,792,260	\$105,503,316	(\$3,038,704)	-3.1%	(\$2,042,415)	-1.9%	20

Notes:

¹ Total effects of Schedule ECAC-94 Deferred ECAC, Schedule GHG-92 Surcharge to Recover Greenhouse Gas Carbon Pollution Permit Cost, Schedule S-95 Surcharge to Recover Mobilehome Park Utility Upgrade Costs, Schedule S-96 Surcharge to Recover Costs Recorded in Catastrophic Event Memorandum Account, Schedule S-191 Surcharge to Fund Public Purpose Programs, Schedule S-192 Surcharge to Fund Energy Savings Assistance Program, and Schedule S-195 Tax Reform Memorandum Account Adjustment. Excludes the effect of pass through adders.