Application No. 22-08-
Exhibit No. PAC/700
Witness: Judith M. Ridenour

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 

## PACIFICORP

Direct Testimony of Judith M. Ridenour
ECAC Rates, GHG Allowance Cost Recovery Rates, California Climate Credit and SOMAH Set Aside

August 2022

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## ATTACHED EXHIBITS

Exhibit PAC/701 - Calculation of Proposed ECAC Adjustment Rates
Exhibit PAC/702 - Proposed ECAC-94 Tariff Changes
Confidential Exhibit PAC/703 - GHG Allowance Costs to be Recovered in Rates
Exhibit PAC/704 - GHG Allowance Revenue to be Distributed Through the California Climate Credit

Exhibit PAC/705 - Calculation of Proposed GHG Allowance Costs Surcharge and California Climate Credit Rates

Confidential Exhibit PAC/706 - Commission Template D-1 - Annual Allowance Revenue Receipts and Customer Returns

Exhibit PAC/707 - Effects of Proposed Rate Change Distributed by Rate Schedule

## I. INTRODUCTION AND QUALIFICATIONS

## Q. Please state your name, business address, and position with PacifiCorp d/b/a Pacific Power (PacifiCorp or Company). <br> A. My name is Judith M. Ridenour. My business address is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232. My present position is Specialist, Pricing \& Cost of Service, in the Regulation Department.

## Q. Briefly describe your education and professional background.

A. I hold a Bachelor of Arts degree in Mathematics from Reed College. I joined the Company in the Regulation Department in October 2000.

## Q. Please describe your current duties.

A. I am responsible for the preparation of rate spread and rate design used in retail price filings and related analyses. Since 2001, with levels of increasing responsibility, I have analyzed and implemented rate spread and rate design proposals throughout the Company's six-state service territory. I have presented testimony on behalf of the Company in California and Oregon.

## II. PURPOSE OF TESTIMONY

## Q. Please summarize your direct testimony.

A. I present the proposed rate spread and rate design for the Company's Energy Cost Adjustment Clause (ECAC) rate schedule, greenhouse gas (GHG) allowance cost recovery rate schedule and for the California Climate Credit rate schedule. The proposed ECAC rate spread and rate design are consistent with the methodology first implemented in the Company's 2005 general rate case ${ }^{1}$ and used in the Company's

[^0] previous ECAC filings. The proposed GHG rate spread and rate design are consistent with Decisions (D.)12-12-033, D.13-12-002, D.13-12-003 and D.21-08-026 which set forth the Commission's methodologies for collecting GHG allowance costs and distributing GHG allowance revenues to customers. The GHG proposed rate spread and rate design are also consistent with previous ECAC filings. The proposed rate spreads and rate designs are based on the 2019 forecast test year, consistent with the Company's most recent approved general rate case. ${ }^{2}$

The estimated combined effect of the proposed ECAC and GHG cost recovery rates is summarized in the following table: ${ }^{3}$

| Customer Class | Proposed Price Change |  |
| :--- | :---: | :---: |
|  | Dollars | Percent (\%) |
| Residential | $\$ 7,489,000$ | $13.5 \%$ |
| Commercial/Industrial | $\$ 5,095,000$ | $13.9 \%$ |
| Irrigation | $\$ 1,794,000$ | $13.6 \%$ |
| Lighting | $\$ 88,000$ | $12.4 \%$ |
| Overall | $\$ 14,466,000$ | $13.6 \%$ |

The table above does not reflect the California Climate Credit. The proposed semi-annual residential and small business California Climate Credit for 2023 is \$268.56.

## III. ECAC ADJUSTMENT RATES

## Q. Please explain the Deferred ECAC adjustment rates.

A. The Deferred ECAC adjustment rates are rates by rate schedule that are calculated based on the Balancing Rate. Deferred ECAC rates for residential, small general

[^1] Deferred ECAC rates for the general service 20 kW and above and irrigation rate schedules consist of both a demand-based rate and an energy-based rate.

## Q. What is the proposed Balancing Rate in this case?

A. As discussed in the direct testimony of Company witness Jack Painter, the proposed Balancing Rate is a credit of $\$ 1.33$ per megawatt-hour (MWh) or -0.133 cents per kilowatt-hour (kWh).
Q. Have you prepared an exhibit showing the calculation of the proposed Deferred ECAC adjustment rates under the Company's proposal?
A. Yes. Exhibit PAC/701 shows the calculation of the proposed demand- and energybased Deferred ECAC adjustment rates by rate schedule in rows 14 through 21.
Q. Please explain how the proposed Deferred ECAC adjustment rates by rate schedule are calculated.
A. The Deferred ECAC adjustment rates were calculated using the Balancing Rate for calendar year 2023. This is consistent with the methodology first implemented in the Company's 2005 general rate case ${ }^{4}$ and used in the Company's previous ECAC filings. The proposed Deferred ECAC rates by rate schedule are derived by first multiplying the proposed Balancing Rate by the total forecast kWh for each schedule. Those revenues are allocated between demand and energy, consistent with the June 2017 Results of Operations from the Company's most recent approved general rate case. ${ }^{5}$ Finally, demand and energy rates for each rate schedule are calculated by

[^2]dividing the appropriate revenue for each function by its corresponding billing quantities, adjusted to account for tariff discounts.

## Q. Please explain the Projected ECAC adjustment rates.

A. The Projected ECAC adjustment rates are rates by rate schedule that are calculated based on the Offset Rate. Projected ECAC rates for residential, small general service under 20 kW , and lighting schedules are energy-based rates. Projected ECAC rates for the general service 20 kW and above and irrigation rate schedules consist of both a demand-based rate and an energy-based rate.
Q. What is the proposed Offset Rate in this case?
A. As discussed in the direct testimony of Mr. Painter, the proposed Offset rate is $\$ 31.33$ per MWh or 3.133 cents per kWh .
Q. Have you prepared an exhibit showing the calculation of the proposed Projected ECAC adjustment rates under the Company's proposal?
A. Yes. Exhibit PAC/701 shows the calculation of the proposed demand- and energybased Projected ECAC adjustment rates by rate schedule in rows 22 through 29.
Q. Please explain how the proposed Projected ECAC adjustment rates by rate schedule are calculated.
A. The Projected ECAC adjustment rates were calculated using the Offset Rate for calendar year 2023. This is consistent with the methodology first implemented in the Company's 2005 general rate case ${ }^{6}$ and used in the Company's previous ECAC filings. The proposed Projected ECAC rates by rate schedule are derived by first multiplying the proposed Offset Rate by the total forecast kWh for each schedule.

[^3]Those revenues are allocated between demand and energy, consistent with the June 2017 Results of Operations from the Company's most recent approved general rate case. ${ }^{7}$ Finally, demand and energy rates for each rate schedule are calculated by dividing the appropriate revenue for each function by its corresponding billing quantities, adjusted to account for tariff discounts.
Q. Please describe Exhibit PAC/702.
A. Exhibit PAC/702 shows proposed revisions to the Company's ECAC-94 tariff. The language in the tariff has been updated to better describe the ECAC mechanism and to better define terminology. Additionally, the tariff shows the proposed rates from this application. The exhibit contains both a clean, coded version of the proposed tariff and a redline version of the proposed changes.

## IV. COLLECTION OF GHG ALLOWANCE COSTS

## Q. What is the total amount of GHG allowance costs to be recovered in rates in 2023?

A. The total amount of GHG allowance costs to be recovered in rates in 2023 is $\$ 21,644,378$ as shown in Confidential Exhibit PAC/703, line six. This amount consists of the forecast 2023 costs, plus a true up related to actual costs for prior years. The amount has been adjusted to account for franchise fees and uncollectibles at the Company's current factor. The amounts in Confidential Exhibit PAC/703 which make up the GHG allowance costs reference the exhibits of other Company witnesses sponsoring those amounts.

[^4]Direct Testimony of Judith M. Ridenour

## Q. How does the Company propose to collect GHG allowance costs from customers?

A. The Company proposes to continue to collect GHG allowance costs through energybased adjustment rates in Schedule GHG-92, Surcharge to Recover Greenhouse Gas Carbon Pollution Permit Cost (GHG Surcharge), which was first implemented in 2014 to collect GHG allowance costs. Consistent with the approved rate spread in the Company's previous GHG proceedings, the Company proposes a rate spread allocated on total present base revenues including net power costs. The GHG allowance costs rate spread and rate design are consistent with D.12-12-033, D.13-12002 and D.13-12-003, which set forth the Commission's methodologies for collecting GHG allowance costs and distributing GHG allowance revenues to customers.
Q. Have you prepared an exhibit which shows the proposed rates for the GHG Surcharge?
A. Yes. Exhibit PAC/705 shows the calculation of proposed rates for the GHG Surcharge. Columns 6 and 7 in the exhibit show the rate spread amongst the customer rate schedules and column 8 shows the proposed surcharge rates.

## V. DISTRIBUTION OF GHG ALLOWANCE REVENUES

Q. What is the total amount of GHG allowance revenues, net of expenses, to be distributed to eligible customers through the California Climate Credit in 2023?
A. The total amount to be distributed to eligible customers through the California Climate Credit in 2023 is $\$ 23,730,768$ as shown in Exhibit PAC/704, line 12. This amount consists of the forecast 2023 revenues offset by the forecast 2023 administrative and outreach costs for the Cap and Trade program, plus a true up
related to actual revenues and administrative and outreach costs for previous years, and, consistent with D.17-12-022 and D.20-04-012, an allowance revenue set aside for the Solar on Multifamily Affordable Housing (SOMAH) Program. The amounts have been adjusted to account for franchise fees and uncollectibles at the Company's current factor. The amounts in Exhibit PAC/704 are referenced in the testimony and exhibits of other Company witnesses sponsoring those amounts. ${ }^{8}$

## Q. Which customers are eligible to receive a portion of the GHG allowance

 revenues?A. As ordered in D.12-12-033, three types of customers are eligible to receive a portion of the GHG allowance revenues: Energy-Intensive Trade-Exposed entities (EITE), Residential customers and Small Business customers. For PacifiCorp, Small Business customers are defined in D.13-12-003 as all customers served under Schedule A-25, General Service Less than 20kW, and customers served under Schedule PA-20, Agricultural Pumping Service, with demand which has not exceeded 20 kW in more than three months within a 12-month period.

## Q. Does PacifiCorp have any EITE customers?

A. No. PacifiCorp is not aware of any EITE entities eligible to receive GHG allowance revenue in its service territory; therefore the total allowance revenue estimated for distribution to EITE customers is $\$ 0$.
Q. What methodology is used to distribute the GHG allowance revenues to eligible customers?
A. In D.12-12-033, the Commission set forth the initial methodology for utilities to

[^5]distribute GHG allowance revenues to customers as an on-bill credit called the California Climate Credit. The credit goes to eligible EITE, Small Business, and Residential customers. As mentioned above, PacifiCorp currently has no EITE customers to receive the credit. In D.21-08-026, the Commission directed utilities to distribute both the Residential credit and the Small Business credit to customers on a semi-annual basis through a per-customer credit.

## Q. Have you prepared an exhibit which shows the proposed rates for the California

 Climate Credit?A. Yes. The calculation of the proposed California Climate Credit rates is shown alongside the calculation of the GHG Surcharge rates in Exhibit PAC/705. Column 10 in the exhibit shows the proposed California Climate Credit rates and column 11 shows in dollars the total credit for each eligible customer type.
Q. What is the proposed semi-annual, per-customer Residential and Small Business bill credit and what are the total amounts to be distributed to Residential and Small Business customers for the year?
A. The proposed semi-annual, per-customer Residential and Small Business California Climate Credit is $\$ 268.56$. The proposed credits will be distributed to eligible customers ${ }^{9}$ in April and October 2023 as required by D.13-12-003 and D.21-08-026, resulting in a total per-customer distribution of $\$ 537.12$ for the year. The proposed semi-annual credit is approximately $\$ 136$ more than the 2022 semi-annual credit.

[^6]Direct Testimony of Judith M. Ridenour

The total amount of the proposed California Climate Credit to be distributed to Residential customers in 2023 is $\$ 19,362,465$. The total amount of the proposed California Climate Credit to be distributed to Small Business customers in 2023 is \$4,368,303

## Q. Please explain Table 1 shown below.

A. Table 1 shows the true-up of the prior year's SOMAH set aside as required by D.20-04-012. This table was previously provided to the Commission on May 17, 2022 in Advice Letter 679-E-A, Annual True-Up for the 2021 SOMAH Set-Aside. If this request is approved, PacifiCorp will transfer the $\$ 124,644$ over-funding set aside from the SOMAH Balancing Account to the Greenhouse Gas Balancing account for calendar year 2021.

Table 1. True-up for the 2021 SOMAH Set-Aside, Set-Aside Amounts 2016$2021{ }^{10}$

| Calendar <br> Year ECAC <br> Forecast | Recorded GHG <br> Allowance <br> Revenues | Set-Aside Based on 10\% <br> of Recorded GHG <br> Allowance Revenue | Actual Set-Aside | Difference <br> (Actual Set-Aside - <br> 10\% Set-Aside) |
| :---: | :---: | :---: | :---: | :---: |
| 2016 | $\$ 9,387,611$ | $\$ 469,380$ | $\$ 469,380$ | $\$ 0$ |
| 2017 | $\$ 10,681,011$ | $\$ 1,068,101$ | $\$ 1,068,101$ | $\$ 0$ |
| 2018 | $\$ 11,216,803$ | $\$ 1,121,680$ | $\$ 1,121,680$ | $\$ 0$ |
| 2019 | $\$ 12,783,641$ | $\$ 1,278,364$ | $\$ 1,278,364$ | $\$ 0$ |
| 2020 | $\$ 13,082,153$ | $\$ 1,308,215$ | $\$ 1,308,215$ | $\$ 0$ |
| 2021 | $\$ 12,114,799$ | $\$ 1,086,835$ | $\$ 1,211,479^{7}$ | $+\$ 124,644$ |

[^7]
## Q. Please explain Confidential Exhibit PAC/706.

A. Confidential Exhibit PAC/706 is the Commission Template D-1, Annual Allowance Revenue Receipts and Customer Returns, adopted in D.14-10-033 and modified in D.21-08-026. The table summarizes forecast and recorded annual amounts related to GHG allowance revenues. The table includes on line 14b the SOMAH true-up identified in Table 1 above. The Company witness supporting each section of the table is shown in the exhibit.

## VI. RATE IMPACTS

Q. What is the impact of the proposed changes to the ECAC rates?
A. The impact of the proposed change to the ECAC Balancing Rate is a rate decrease of approximately $\$ 1.8$ million over the amount collected through present rates. The impact of the proposed change to the ECAC Offset Rate is a rate increase of approximately $\$ 5.6$ million from the amount collected through present rates. Present rates do not reflect ECAC changes proposed in the Company's pending 2022 ECAC application, A.21-08-004.
Q. What is the impact of the proposed changes to the GHG Surcharge rates?
A. The impact of the proposed changes to the GHG Surcharge rates is a rate increase of approximately $\$ 10.7$ million.
Q. What are the overall combined effects of the Company's proposed ECAC and GHG allowance costs rate change?
A. The overall effects of the proposed ECAC and GHG allowance costs rate change from rates presently in effect are shown in Exhibit PAC/707 and are summarized in the following table:

| Customer Class | Proposed Price Change |  |
| :--- | :---: | :---: |
|  | Dollars | Percent (\%) |
| Residential | $\$ 7,489,000$ | $13.5 \%$ |
| Commercial/Industrial | $\$ 5,095,000$ | $13.9 \%$ |
| Irrigation | $\$ 1,794,000$ | $13.6 \%$ |
| Lighting | $\$ 88,000$ | $12.4 \%$ |
| Overall | $\$ 14,466,000$ | $13.6 \%$ |

The rate impacts shown in the exhibit and the table exclude the effects of the California Climate Credit.

## Q. Please describe Exhibit PAC/707.

A. Exhibit PAC/707 shows the effects of the Company's proposed combined ECAC and GHG cost recovery rate change by rate schedule. Columns 5 through 9 show present revenues. Present base revenues are shown in column 5. Present Projected ECAC revenues are shown in column 6 . Column 7 adds columns 5 and 6 for total present base revenues including Projected ECAC. The adders in column 8 include revenues for adjustment schedules that are not a part of base revenues including the present Deferred ECAC and present GHG Surcharge. Column 9 adds columns 7 and 8 to show present revenues net of adders. Pass through adjustments such as the Surcharge to Fund Residential California Alternative Rates for Energy (CARE), CARE discounts, and the California Climate Credit are excluded from revenues in this table.

Similarly, for proposed revenues, columns 10 through 14 show the base proposed revenues, proposed Projected ECAC revenues, proposed total base revenues with Projected ECAC, proposed adders including the proposed Deferred ECAC and proposed GHG Surcharge, and proposed net revenues. The proposed base rate change in dollars and percentage is shown by rate schedule in columns 15 and 16.

3 Does this conclude your direct testimony?
4 A. Yes.

Application No. 22-08-
Exhibit No. PAC/701
Witness: Judith M. Ridenour

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 

## PACIFICORP

Exhibit Accompanying Direct Testimony of Judith M. Ridenour Calculation of Proposed ECAC Adjustment Rates








|  |  |  |  <br>  |
| :---: | :---: | :---: | :---: |
|  |  |  |  |

Application No. 22-08-
Exhibit No. PAC/702
Witness: Judith M. Ridenour

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 

## PACIFICORP

Exhibit Accompanying Direct Testimony of Judith M. Ridenour

Proposed ECAC-94 Tariff Changes

August 2022
$\qquad$

SCHEDULE ECAC-94

## ENERGY COST ADJUSTMENT CLAUSE TARIFF RATE RIDER

## AVAILABLE:

In all territory served by Company in California.
APPLICABLE:
To all electric sales rendered under all tariff schedules authorized by the
Commission.

## PURPOSE:

To include in rates for all retail tariff rate schedules the normally scheduled adjustment to reflect all net power costs (NPC) and other costs approved for recovery through the Energy Cost Adjustment Clause (ECAC).

## DEFINITIONS:

Offset Period shall be the $12-m o n t h$ period beginning January 1 st and ( extending through December 31 st of the period in which the tariff rider rates will be applicable.

Balancing Period shall be the 24 -month period, beginning January 1st and extending through December 31st, ending immediately prior to the beginning of the Offset Period.

Intermediate Period shall be the portion of the Balancing Period, ending (N) immediately prior to the beginning of the Offset Period, during which (N) Adjusted Actual NPC has not yet been recorded.

Projected NPC is the Total Company sum of net power cost components during the Intermediate Period and the Offset Period calculated either between or during general rate cases by the Company's production cost model.

Other Costs for Recovery are costs other than net power costs to be recovered
through the ECAC including, on a California allocated basis as necessary, payments (or bill credits) for the net surplus compensation expense as described in Schedule NEM-35; renewable energy production tax credits; California Air Resources Board (CARB) implementation fees; fuel stock carrying charges; purchases of renewable energy certificates for renewables portfolio standard compliance; start-up fuel costs and mandatory reporting and verification costs associated with the annual greenhouse gas emissions report(s) submitted to CARB; and other costs approved by the Commission for recovery through the ECAC.

ECAC Billing Factor is the adjustment rate for franchise fees and uncollectible accounts expenses from the most recent general rate case.

ECAC Offset Rate is an unbundled rate established either during the most recent California general rate case or between general rate cases if the new ECAC Offset Rate changes by more than $5 \%$ and is equal to the Offset Period's California allocated Projected NPC plus Other Costs for Recovery, all divided by California projected sales and adjusted for the ECAC Billing Factor.

| Advice Letter No. | Issued by |  |
| :---: | :---: | :---: |
|  | Matthew McVee | Date Filed |
|  | Name |  |
| Decision No. | VP, Regulation | Effective |

$\qquad$ Revised Cal.P.U.C.Sheet No. 4811-E

## SCHEDULE ECAC-94

## ENERGY COST ADJUSTMENT CLAUSE TARIFF RATE RIDER

(Continued)

## DEFINITIONS: (Continued)

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

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

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

## BASIS OF RATES

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

## TIMING

The Company shall file normally scheduled Total ECAC Adjustment applications with the Commission on or before August lst of each year. The implementation and effective date of Total ECAC Adjustments shall be January 1st of each year, unless otherwise ordered by the Commission. Y BILLING
All charges and provisions of the applicable rate schedule will be applied in determining a Customer's bill except that the Customer's total electric bill will be adjusted by an amount equal to the product of all kilowatt demand multiplied by the following dollar per kilowatt rate plus all kilowatt-hours of use multiplied by the following cents per kilowatt-hour rate:
(Continued)

| Advice Letter No. |  |  |
| :--- | :--- | :--- |
| Decision No. | Issued by <br> Matthew McVee | Date Filed |
| TF6 ECAC-94-2.REV |  |  |



RULES AND REGULATIONS
Service under this Schedule is subject to the General Rules and Regulations contained in the tariff of which this Schedule is a part, and to those prescribed by regulatory authorities.

| Advice Letter No. |  |  |
| :--- | :--- | :--- |
| Decision No. | Issued by <br> Matthew McVee | Date Filed |
| TF6 ECAC-94-3.REV |  |  |

## SCHEDULE ECAC-94

ENERGY COST ADJUSTMENT CLAUSE TARIFF RATE RIDER

## AVAILABLE:

In all territory served by Company in California.

## APPLICABLE:

To all electric sales rendered under all tariff schedules authorized by the Commission.

## PURPOSE:

To include in rates for aAll retail tariff rate schedules the will be subject to a normally scheduled afcAc Adjustment to reflect all net power costs (NPC) and other costs approved for recovery through the Energy Cost Adjustment Clause (ECAC).
-which include fuel, purchased power, wheeling, and sales for resale except for NPC costs not specifically modeled in GRID. The ECAC Adjustment will also include: payments (or bill credits) for the net surplus compensation expense as described in Schedule NEM-35; production tax credits; California Air Resources Board (CARB) implementation fees; and mandatory reporting and verification costs associated with the annual greenhouse gas emissions report (s) submitted to CAPB.

## DEFINITIONS:

FCAC Rate EffectiveOffset Period shall be the projected-12-month period beginning January 1st and extending through December 31st of the period in which the tariff rider ratesTotal ECAC Adjustment will be applicable.

Comparison Balancing Period shall be the historic 12-24-_month period, beginning January 1st and extending through December 31st, ending immediately prior to the beginning of the Offset Period for purposes of determining the Deferred ECAC.

Intermediate Period shall be the portion of the Balancing Period, ending immediately prior to the beginning of the Offset Period, during which Adjusted Actual NPC has not yet been recorded.

Projected NPC is the Total Company sum of net power cost components during the Intermediate Period and the Offset Period forward looking rate effective period calculated either between or during general rate cases by the Company's production cost dispatch model.

Other Costs for Recovery are costs other than net power costs to be recovered through the ECAC including, on a California allocated basis as necessary, payments (or bill credits) for the net surplus compensation expense as described in Schedule NEM-35; renewable energy production tax credits; California Air Resources Board (CARB) implementation fees; fuel stock carrying charges; purchases of renewable energy certificates for renewables portfolio standard compliance; start-up fuel costs and mandatory reporting and verification costs associated with the annual greenhouse gas emissions report(s) submitted to CARB; and other costs approved by the Commission for recovery through the ECAC.

ECAC Billing Factor is the adjustment rate for franchise fees and uncollectible accounts expenses from the most recent general rate case.

ECAC Offset Rate is an unbundled rate established either during the most recent California general rate case or between general rate cases if the new ECAC Offset Rate changes by more than $5 \%$ and is equal to the Offset Period's California allocated Projected NPC plus Other Costs for Recovery allocated to California and, all divided by California projected sales and adjusted for the ECAC Billing Factor.


#### Abstract

Adjusted Actual NP is the sum of the total Company amounts recorded in Account Numbers: 501, 503 and 547 (Steam Production-Fucl Expense) for coal, steam and natural gas purchased and or sold; 555 (Purchased Power), 565 (Wheeling); and 447 (Sales for Resale). Adjustments will be made to these accounts so adjusted actual costs are consistent with costs modeled in the Company's production dispatch model, to remove prior period accounting entries made during the accrual period, and to include Commission-adopted adjustments from the most recent general rate case such as the SMUD revenue imputation adjustment. Adjustments for hydro normalization, foreed outages etc. are excluded because they give rise to the net powe cost volatility this mechanism captures for rate making.


ECAC Balancing Rate is the California allocated share of the difference between Projected Total Company NPC (adjusted by the ratio of California actual sales to projected sales) and Adjusted Actual NPC.

# SCHEDULE ECAC-94 <br> ENERGY COST ADJUSTMENT CLAUSE TARIFF RATE RIDER <br> (Continued) 

## DEFINITIONS: (Continued)

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

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

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

Total ECAC NPC Rate is the sum of the ECAC Offset Rate plus the ECAC Balancing Rate.

Energy Cost Adjustment Clause Billing Factor (ECACBF) is the Total ECAC NPC Rate adjusted for franchise fees and uncollectible accounts expenses.

## Total ECAC Adjustment

Total ECAC Adjustment shall be calculated once per year, utilizing the ECAC Rate fffective Period Offset Period and the Comparison Balancing Period.

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

## TIMING

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

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

|  |  |  | Total |
| :---: | :---: | :---: | :---: |
| Schedule Billing | Projected | Deferred | ECAC |
|  | Units | ECAC | ECAC |



|  | SCHEDULE ECAC-94 |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | ENERGY COST ADJUSTMENT CLAUSE TARIFF RATE RIDER |  |  |  |
|  | (Continued) |  |  |  |
| MONTHLY BILLING (Continued) |  |  |  |  |
|  |  |  |  |  |
| Schedule | Billing | Projected | Deferred | Total ECAC |
|  | Units | ECAC | ECAC | Adjustment |
| A-25 | Energy per kWh | 3.133 ¢ | (0.133 ${ }^{\text {) }}$ | 3.000 ¢ |
| A-32 | Demand per kW | \$1.49 | (\$0.06) | \$1.43 |
|  | Energy per kWh | 2.369 ${ }^{\text {\% }}$ | (0.101¢) | 2.268 ${ }^{\text {¢ }}$ |
| A-36 | Demand per kW | \$3.12 | (\$0.13) | \$2.99 |
|  | Energy per kWh | 2.369 ${ }^{\text {¢ }}$ | (0.101 \%) | 2.268 ${ }^{\text {¢ }}$ |
| AT-48 | Demand per kW | \$2.97 | (\$0.13) | \$2.84 |
|  | Energy per kWh | 2.376 ¢ | (0.101\%) | 2.275 ${ }^{\text {¢ }}$ |
| D | Energy per kWh | 3.136 ¢ | (0.133 $)$ | $3.003 ¢$ |
| DL-6 | Energy per kWh | 3.136 ¢ | (0.133 $)$ | $3.003 ¢$ |
| DS-8 | Energy per kWh | 3.136 ¢ | (0.133 $)$ | $3.003 ¢$ |
| DM-9 | Energy per kWh | $3.1362 .390 \%$ | (0.133105 ${ }^{\text {( }}$ | $3.0032 .495 \%$ |
| PA-20 | Demand per kW | \$1.711.31 | (\$0.0706) | \$1.641.37 |
|  | Energy per kWh | 2.3691.806 | (0.101079¢) | 2.2681.885 |
| LS-51 | Energy per kWh | $3.1332 .388 \%$ | (0.133105 ${ }^{\text {( }}$ | $3.0002 .493 \%$ |
| LS-53 | Energy per kWh | $3.1332 .388 \%$ | (0.133105 ${ }^{\text {( }}$ ) | $3.0002 .493 \%$ |
| LS-58 | Energy per kWh | 3.1332 .3884 | (0.133105 ${ }^{\text {( }}$ | $3.0002 .493 \%$ |
| OL-15 | Energy per kWh | 3.1332 .3884 | (0.133105 ${ }^{\text {( }}$ ) | $3.0002 .493 \%$ |
| OL-42 | Energy per kWh | $3.1332 .388 \%$ | (0.133105 ${ }^{\text {( }}$ | $3.0002 .493 \%$ |

RULES AND REGULATIONS
Service under this Schedule is subject to the General Rules and Regulations contained in the tariff of which this Schedule is a part, and to those prescribed by regulatory authorities.

Application No. 22-08-
Exhibit No. PAC/703
Witness: Judith M. Ridenour

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 

## PACIFICORP

## REDACTED

Exhibit Accompanying Direct Testimony of
Judith M. Ridenour
GHG Allowance Costs to be Recovered in Rates

August 2022

## CONFIDENTIAL <br> Exhibit PAC/703 <br> PACIFICORP <br> STATE OF CALIFORNIA <br> GHG Allowance Costs to be Recovered in Rates

| Line No. | Description | Forecast | Source |
| :---: | :---: | :---: | :---: |
| 1 GHG Allowance Costs |  |  |  |
| 2 | 22023 |  | Confidential Exhibit PAC/402 |
|  | 3 Gross up for Franchise Fees and Uncollectibles Expense ${ }^{(1)}$ |  |  |
| 4 | 4 Subtotal Recorded/Forecast Costs |  |  |
| 5 <br> Greenhouse Gas Allowance Costs Sub-balancing Account Under / (Over) Collection |  |  | Confidential Exhibit PAC/403 |
|  | 6 GHG Allowance Costs to be Recovered in Rates | \$ 21,644,378 | line $4+$ line 5 |

(1)Factor of $97.977602 \%$

CONFIDENTIAL INFORMATION SHADED IN GRAY

Application No. 22-08-
Exhibit No. PAC/704
Witness: Judith M. Ridenour

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 

## PACIFICORP

Exhibit Accompanying Direct Testimony of
Judith M. Ridenour
GHG Allowance Revenue to be Distributed Through the California Climate Credit

August 2022

## Exhibit PAC/704 <br> PACIFICORP <br> STATE OF CALIFORNIA <br> GHG Allowance Revenue to be Distributed Through the California Climate Credit

| Line No. | Description | Forecast for Climate Credit | Source |
| :---: | :---: | :---: | :---: |
| 1 GHG Allowance Revenues |  |  |  |
| 2 | 2023 | \$ (17,902,917) | Exhibit PAC/409 |
| 3 | Gross up for Franchise Fees and Uncollectibles Expense ${ }^{(1)}$ | \$ $(362,068)$ |  |
| 4 | Subtotal Recorded/Forecast Revenues | \$ (18,264,985) |  |
| 5 | Greenhouse Gas Allowance Revenue Balancing Account (Under) / Over | \$ $(7,218,150)$ | Exhibit PAC/408 |
| 6 | Forecast Expenses - 2023 |  |  |
| 7 | GHG Outreach and Education Costs | \$ 80,000 | Exhibit PAC/503 |
| 8 | GHG Administrative Costs | \$ 5,000 | Exhibit PAC/602 |
| 9 | Gross up for Franchise Fees and Uncollectibles Expense ${ }^{(1)}$ | \$ 1,719 |  |
| 10 | Subtotal Forecast Expenses | \$ 86,719 |  |
|  | Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs ${ }^{(2)}$ | \$ 1,665,648 | Line 2 * $10 \%$ + True-up |
| 12 | Net GHG Allowance Revenues Available for Return | \$ $(23,730,768)$ | Line $4+$ Line $5+$ Line $10+$ Line 11 |

Summary of California Climate Credit Distribution
EITE Customer Distribution
15 Total Revenue Available for Climate Credit

16 Estimated Number of Residential Customers Eligible for Climate Credit
17 Estimated Number of Sm. Business Customers Eligible for Climate Cr.
18 Total Estimated Number of Customers Eligible for Climate Credit
19 Semi-Annual Per-Customer Climate Credit
(1) Factor of $97.977602 \%$
(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 midyear in 2016 when the company was directed to set aside $5 \%$ for half of 2016 and $10 \%$ annually thereafter.
\$ (268.56) Exhibit PAC/705
\$
\$ $(23,730,768)$ Line 12 - Line 14

| 36,049 | Exhibit PAC/705 |
| ---: | :--- |
| 8,133 | Exhibit PAC/705 |
| 44,182 |  |

Application No. 22-08-
Exhibit No. PAC/705
Witness: Judith M. Ridenour

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 

## PACIFICORP

Exhibit Accompanying Direct Testimony of Judith M. Ridenour

Calculation of Proposed GHG Allowance Costs Surcharge and California Climate Credit Rates

\begin{tabular}{|c|c|c|}
\hline \& 203 clim \& 隹 <br>
\hline Customer \& ${ }^{\text {Cradit }}$ \& Revenue <br>
\hline \multirow[t]{2}{*}{${ }^{\text {(9) }}$} \& ${ }_{\text {Rea }}$ \& (11) <br>
\hline \& \&  <br>
\hline ${ }^{36,499}$ s \& (537.11) \& (s19, 3624.465 <br>
\hline ${ }^{7,131} \mathrm{~s}$ \& (537.11) \& (53, 33, 115) <br>
\hline \multirow[t]{3}{*}{${ }^{1.002 ~ s}$} \& (537.11) \& (553, 188) <br>
\hline \& \& ${ }_{(54,368,303)}$ <br>
\hline \& \& (823,730,788) <br>
\hline 44,182

s \& $$
\begin{aligned}
& (537.11) \\
& (268.56)
\end{aligned}=
$$ \& $(523,70,788)$ <br>

\hline
\end{tabular}

Exhibit PAC/705
PACIFICORP
CALCULATION OF PROPOSED GHG ALLOWANCE COSTS SURCHARGE AND CLIMATE CREDIT RATES



| $\begin{aligned} & \text { Line } \\ & \text { No. } \\ & \hline \end{aligned}$ | Description |
| :---: | :---: |
|  | (1) |
|  | Residential |
| 1 | Residential Service |
| 2 | Multi-Family - Master Metered |
| 3 | Multi-Family - Submetered |
| 4 | Total Residential |
|  | Commercial \& Industrial |
| 5 | General Service - < 20 kW |
| 6 | General Service - 20 kW \& Over |
| 7 | General Service - 100 kW \& Over |
| 8 | Large General Service - 500 kW \& Over |
| 9 | Agricultural Pumping Service - Under 20 kW |
| 10 | Agricultural Pumping Service - Over 20 kW |
| 11 | Total Commercial \& Industrial |
|  | Lighting |
| 12 | Outdoor Area Lighting Service |
| 13 | Airway \& Athletic Lighting |
| 14 | Street Lighting, Utility Owned |
| 15 | Street Lighting, Cust. Owned Energy Only |
| 16 | Street Lighting, Customer Owned |
| 17 | Total Lighting |
| 18 | Total Sales to Ultimate Consumers |
| 19 | Total AGA |
| 20 | Total Employee Discount |
| 21 | Total Sales (inc. AGA and Employee Discount) |
| Notes: |  |
| 1 | Customer counts for Schedules DM-9 and DS-8 adjus |

Application No. 22-08-
Exhibit No. PAC/706
Witness: Judith M. Ridenour

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 

## PACIFICORP

## REDACTED

Exhibit Accompanying Direct Testimony of
Judith M. Ridenour
Commission Template D-1 - Annual Allowance Revenue Receipts and Customer Returns

Exhibit PAC/706
CONFIDENTIAL
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Commission Template D-1
Annual Allowance Revenue Receipts and Customer Returns


[^8]Application No. 22-08-
Exhibit No. PAC/707
Witness: Judith M. Ridenour

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 

## PACIFICORP

Exhibit Accompanying Direct Testimony of
Judith M. Ridenour
Effects of Proposed Rate Change Distributed by Rate Schedule



[^0]:    ${ }^{1}$ Application (A.) 05-11-022, Decision (D.) 06-12-011.
    Direct Testimony of Judith M. Ridenour

[^1]:    ${ }^{2}$ 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.22-03-014 (2022 Application) and for the ECAC rate, this reflects rates approved in D.21-11-001 (2021 Application).

    Direct Testimony of Judith M. Ridenour

[^2]:    ${ }^{4}$ A.05-11-022, D.06-12-011.
    ${ }^{5}$ A.18-04-002.
    Direct Testimony of Judith M. Ridenour

[^3]:    ${ }^{6}$ A. 05-11-022, D.06-12-011.
    Direct Testimony of Judith M. Ridenour

[^4]:    ${ }^{7}$ A.18-04-002.

[^5]:    ${ }^{8}$ See 'Source' column of Exhibit PAC/704.

    Direct Testimony of Judith M. Ridenour

[^6]:    ${ }^{9}$ Including Small Business Customers on tariff Schedules A-25 and PA-20 and Residential customers on tariff Schedules D, DL-6, DS-8, and DM-9. Eligible customers are defined as customers with an active account receiving electrical service under an eligible tariff schedule 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.

[^7]:    ${ }^{10}$ Commission Decision (D.) 17-12-022, Decision Adopting Implementation Framework for Assembly Bill 693 and Creating the Solar on Multifamily Affordable Housing Program at p. 36 states that each participating investor-owned utility (IOU) shall not contribute more than its proportionate share of $\$ 100$ million each year for the SOMAH program, or 10 percent of $\$ 1$ billion; if the actual funding exceeds $\$ 100$ million, the share for each utility will be based on the fraction of total recorded GHG allowance sale proceeds. 2021 was the first year that the total GHG revenues from the IOUs exceeded $\$ 1$ billion. PacifiCorp filed Advice letter 679-E and 679-E-A to address this true up.

    Direct Testimony of Judith M. Ridenour

[^8]:    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.
    2016: 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.
    2020: See Pacificorp Advice Letter 67 -E-A.
     SOMAH-approved funding and set-aside for the year in its entirety, consistent with D. $20-04-012$ which reauthorized the allocation of SOMAH funding from July 2020 through June 30,2026 .
    2020 Recorded amount was also updated to remove $\$ 210,707$ shortall which the company was incorrectly directed to set aside in a February 2020 ruling. This results in an increase of $\$ 210,707$ to the Climate Credit to be carried
    
     Note 2: Unnumbered rows labled "xx" are included to show rows of data from previous years which are no longer inlcuded in this Template D-1 beginning in 2022 . Line numbers and labels in this Template D-1 reflect updates to
    Template D-1 approved in D.21-08-026.

