

Application No. 24-08-____
Exhibit No. PAC/700
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP ECAC 2025

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

August 2024

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ATTACHED EXHIBITS

Exhibit PAC/701 – Calculation of Proposed ECAC Adjustment Rates

Confidential Exhibit PAC/702-C – GHG Allowance Costs to be Recovered in Rates

Exhibit PAC/703 – GHG Allowance Revenue to be Distributed Through the California

Climate Credit

Exhibit PAC/704 – Calculation of Proposed GHG Allowance Costs Surcharge and California

Climate Credit Rates

Confidential Exhibit PAC/705-C – Commission Template D-1 – Annual Allowance Revenue

Receipts and Customer Returns

Exhibit PAC/706 – Effects of Proposed Rate Change Distributed by Rate Schedule

Exhibit PAC/707 – Essential Usage and Average Usage Bills, Affordability Ratios and Hours

at Minimum Wage by Climate Zone

Direct Testimony of Judith M. Ridenour

1 **I. INTRODUCTION AND QUALIFICATIONS**

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 & Cost
6 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. PURPOSE 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.

21 The proposed ECAC rate spread and rate design are consistent with the
22 methodology first implemented in the Company's 2005 general rate case and used in

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1 the Company’s previous ECAC filings.¹ The proposed GHG rate spread and rate
 2 design are consistent with Decisions (D.)12-12-033, D.13-12-002, D.13-12-003 and
 3 D.21-08-026 which set forth the Commission’s methodologies for collecting GHG
 4 allowance costs and distributing GHG allowance revenues to customers. The GHG
 5 proposed rate spread and rate design are also consistent with previous ECAC filings.
 6 The proposed rate spreads and rate designs are based on the 2023 forecast test year,
 7 consistent with the Company’s most recent approved 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	\$4,458,000	5.8%
Commercial/Industrial	\$3,189,000	6.2%
Irrigation	\$983,000	6.0%
Lighting	\$67,000	10.2%
Overall	\$8,697,000	6.0%

10 The table above does not reflect the California Climate Credit. The proposed
 11 semi-annual residential and small business California Climate Credit for 2025 is
 12 \$259.36.

13 I also present the Affordability Metrics required by Decision (D.) 22-08-023.

14 As indicated below, the expected rate increase from this ECAC filing exceeds the one

¹ Application (A.) 05-11-022, Decision (D.) 06-12-011.

² A.22-05-006.

³ Shows effect of proposed rates in comparison to currently effective rates – for the GHG cost recovery rate, this reflects rates approved in D.24-03-011 (2024 ECAC) and for the ECAC rate, this reflects rates approved in D.23-08-030 (2023 ECAC). Present revenues and resulting rate impacts to be updated pending the outcome of the Company’s 2024 ECAC A.23-09-008.

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1 percent threshold thereby requiring the Company to present Affordability Metrics.
2 Exhibit PAC/707 shows the Affordability Metrics.

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 Company witness Jack Painter, the proposed
12 Balancing Rate is \$7.87 per megawatt-hour (MWh) or 0.787 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/701 shows the calculation of the proposed demand- and energy-
17 based Deferred ECAC adjustment rates by rate schedule in rows 13 through 19.

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
21 calendar year 2025. This is consistent with the methodology first implemented in the
22 Company's 2005 general rate case and used in the Company's previous ECAC

1 filings.⁴ The proposed Deferred ECAC rates by rate schedule are derived by first
2 multiplying the proposed Balancing Rate by the total forecast kWh for each schedule.
3 Those revenues are allocated between demand and energy, consistent with the
4 June 2021 Results of Operations from the Company's most recent approved general
5 rate case.⁵ Finally, demand and energy rates for each rate schedule are calculated by
6 dividing the appropriate revenue for each function by its corresponding billing
7 quantities, adjusted to account for tariff discounts and lighting tariff kWh.

8 **Q. Please explain the Projected ECAC adjustment rates.**

9 A. The Projected ECAC adjustment rates are rates by rate schedule that are calculated
10 based on the Offset Rate. Projected ECAC rates for residential, small general service
11 under 20 kW, and lighting schedules are energy-based rates. Projected ECAC rates
12 for the general service 20 kW and above and irrigation rate schedules consist of both
13 a demand-based rate and an energy-based rate.

14 **Q. What is the proposed Offset Rate in this case?**

15 A. As discussed in the direct testimony of Mr. Painter, the proposed Offset rate is \$45.76
16 per MWh or 4.576 cents per kWh. However, as this rate is less than a five percent
17 increase from the 2024 Offset Rate of \$44.94 per MWh the Company is not
18 proposing to change the Offset Rate in this case. Since the 2024 Offset Rate has not
19 yet been approved by the Commission and has not yet been put into rates, present
20 rates in this case reflect rates approved in the 2023 ECAC and proposed Projected
21 ECAC rates, which are determined based on the Offset Rate, are set equal to the

⁴ A.05-11-022, D.06-12-011.

⁵ A. 22-05-006.

1 present rates. Both present and proposed ECAC Projected rates will be updated in
2 this case as soon as the final outcome of the 2024 ECAC is known.

3 **IV. COLLECTION OF GHG ALLOWANCE COSTS**

4 **Q. What is the total amount of GHG allowance costs to be recovered in rates in**
5 **2025?**

6 A. The total amount of GHG allowance costs to be recovered in rates in 2025 is
7 \$18,158,508 as shown in Confidential Exhibit PAC/702-C, line six. This amount
8 consists of the forecast 2025 costs, plus a true up related to actual costs for prior
9 years. The amount has been adjusted to account for franchise fees and uncollectibles
10 at the Company's current factor. The amounts in Confidential Exhibit PAC/702-C
11 which make up the GHG allowance costs reference the exhibits of other Company
12 witnesses sponsoring those amounts.

13 **Q. How does the Company propose to collect GHG allowance costs from**
14 **customers?**

15 A. The Company proposes to continue to collect GHG allowance costs through energy-
16 based adjustment rates in Schedule GHG-92, Surcharge to Recover Greenhouse Gas
17 Carbon Pollution Permit Cost (GHG Surcharge) which was first implemented in 2014
18 to collect GHG allowance costs. Consistent with the approved rate spread in the
19 Company's previous GHG proceedings, the Company proposes a rate spread
20 allocated on total present base revenues including net power costs. The GHG
21 allowance costs rate spread and rate design are consistent with D.12-12-033, D.13-12-
22 002 and D.13-12-003, which set forth the Commission's methodologies for collecting
23 GHG allowance costs and distributing GHG allowance revenues to customers.

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1 **Q. Have you prepared an exhibit which shows the proposed rates for the GHG**
2 **Surcharge?**

3 A. Yes. Exhibit PAC/704 shows the calculation of proposed rates for the GHG
4 Surcharge. Columns 6 and 7 in the exhibit show the rate spread amongst the customer
5 rate schedules and column 8 shows the proposed surcharge rates.

6 **V. DISTRIBUTION OF GHG ALLOWANCE REVENUES**

7 **Q. What is the total amount of GHG allowance revenues, net of expenses, to be**
8 **distributed to eligible customers through the California Climate Credit in 2025?**

9 A. The total amount to be distributed to eligible customers through the California
10 Climate Credit in 2025 is \$23,343,079 as shown in Exhibit PAC/703, line 12. This
11 amount consists of the forecast 2025 revenues offset by the forecast 2025
12 administrative and outreach costs for the Cap and Trade program, plus a true up
13 related to actual revenues and administrative and outreach costs for previous years,
14 and, consistent with D.17-12-022, D.20-04-012 and D.22-09-009, an allowance
15 revenue set aside for the Solar on Multifamily Affordable Housing Program. The
16 amounts have been adjusted to account for franchise fees and uncollectibles at the
17 Company's current factor. The amounts in Exhibit PAC/703 are referenced in the
18 testimony and exhibits of other Company witnesses sponsoring those amounts.⁶

19 **Q. Which customers are eligible to receive a portion of the GHG allowance**
20 **revenues?**

⁶ See 'Source' column of Exhibit PAC/703.

1 A. As ordered in D.12-12-033, three types of customers are eligible to receive a portion
2 of the GHG allowance revenues: Energy-Intensive Trade-Exposed entities (EITE),
3 Residential customers and Small Business customers. For PacifiCorp, Small
4 Business customers are defined in D.13-12-003 as all customers served under
5 Schedule A-25, General Service Less than 20kW, and customers served under
6 Schedule PA-20, Agricultural Pumping Service, with demand which has not exceeded
7 20 kW in more than three months within a 12-month period.

8 **Q. Does PacifiCorp have any EITE customers?**

9 A. No. PacifiCorp is not aware of any EITE entities eligible to receive GHG allowance
10 revenue in its service territory; therefore the total allowance revenue estimated for
11 distribution to EITE customers is \$0.

12 **Q. What methodology is used to distribute the GHG allowance revenues to eligible**
13 **customers?**

14 A. In D.12-12-033, the Commission set forth the initial methodology for utilities to
15 distribute GHG allowance revenues to customers as an on-bill credit called the
16 California Climate Credit. The credit goes to eligible EITE, Small Business, and
17 Residential customers. As mentioned above, PacifiCorp currently has no EITE
18 customers to receive the credit. In D.21-08-026, the Commission directed utilities to
19 distribute both the Residential credit and the Small Business credit to customers on a
20 semi-annual basis through a per-customer credit.

21 **Q. Have you prepared an exhibit which shows the proposed rates for the California**
22 **Climate Credit?**

1 A. Yes. The calculation of the proposed California Climate Credit rates is shown
2 alongside the calculation of the GHG Surcharge rates in Exhibit PAC/704. Column
3 10 in the exhibit shows the proposed California Climate Credit rates and column 11
4 shows in dollars the total credit for each eligible customer type.

5 **Q. What is the proposed semi-annual, per-customer Residential and Small Business**
6 **bill credit and what are the total amounts to be distributed to Residential and**
7 **Small Business customers for the year?**

8 A. The proposed semi-annual, per-customer Residential and Small Business California
9 Climate Credit is \$259.36. The proposed credits will be distributed to eligible
10 customers in April and October 2025 as required by D.13-12-003 and D.21-08-026,
11 resulting in a total per-customer distribution of \$518.71 for the year.⁷ The proposed
12 semi-annual credit is approximately \$85 more than the 2024 semi-annual credit. The
13 total amount of the proposed California Climate Credit to be distributed in Residential
14 customers in 2025 is \$19,112,232. The total amount of the proposed California
15 Climate Credit to be distributed to Small Business customers in 2025 is \$4,230,847.

16 **Q. Please explain Confidential Exhibit PAC/705-C.**

17 A. Confidential Exhibit PAC/705-C is the Commission Template D-1, Annual
18 Allowance Revenue Receipts and Customer Returns, adopted in D.14-10-033 and
19 modified in D.21-08-026. The table summarizes forecast and recorded annual

⁷ 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.
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1 amounts related to GHG allowance revenues. The Company witness supporting each
2 section of the table is shown in the exhibit.

3 PacifiCorp is also required to estimate the funds to be allocated to the Solar on
4 Multifamily Affordable Housing (SOMAH) Program each year from the sale of
5 greenhouse gas allowances. D.22-09-009 simplified the process for forecasting and
6 setting aside funding for the SOMAH program, including requiring each company to
7 contribute its proportionate share of \$100,000,000 and requiring an annual joint
8 investor-owned utility advice letter to true up the annual SOMAH set asides each
9 year. The table below summarizes the Company's annual SOMAH set asides.

SOMAH Funding Prior Years True-Up	Recorded GHG Allowance Revenues	Set-Aside Based on 10% of Recorded GHG Revenue (\$100M limit)	Previously Approved 'Actual' Set-Aside	Difference (Actual 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	(\$124,644)
2022	\$15,563,147	\$1,556,315	\$1,066,147	\$490,168
2023	\$17,848,799	\$1,134,816	\$1,784,880	(\$650,064)
Total	\$102,677,964	\$9,023,706	\$9,308,246	-\$284,540

10

11

VI. RATE IMPACTS

12

Q. What is the impact of the proposed changes to the ECAC rates?

13

A. The impact of the proposed change to the ECAC Balancing Rate is a rate increase of
14 approximately \$7.0 million over the amount collected through present rates⁸. The

⁸ Present revenues and resulting rate impacts to be updated pending the outcome of the Company's 2024 ECAC A.23-09-008.

1 Company proposes no change to the ECAC Offset Rate in this case so there is no
2 related rate impact.

3 **Q. What is the impact of the proposed changes to the GHG Surcharge rates?**

4 A. The impact of the proposed changes to the GHG Surcharge rates is a rate increase of
5 approximately \$1.7 million.

6 **Q. What are the overall combined effects of the Company's proposed ECAC and
7 GHG allowance costs rate change?**

8 A. The overall effects of the proposed ECAC and GHG allowance costs rate change
9 from rates presently in effect are shown in Exhibit PAC/706 and are summarized in
10 the following table⁹. These rate impacts do not include the effects of the California
11 Climate Credit.

Customer Class	Proposed Price Change	
	Dollars	Percent (%)
Residential	\$4,458,000	5.8%
Commercial/Industrial	\$3,189,000	6.2%
Irrigation	\$983,000	6.0%
Lighting	\$67,000	10.2%
Overall	\$8,697,000	6.0%

12 **Q. Please describe Exhibit PAC/706.**

13 A. Exhibit PAC/706 shows the effects of the Company's proposed combined ECAC and
14 GHG cost recovery rate change by rate schedule. Columns 5 through 9 show present
15 revenues. Present base revenues are shown in column 5. Present Projected ECAC
16 revenues are shown in column 6. Column 7 adds columns 5 and 6 for total present

⁹ Shows effect of proposed rates in comparison to currently effective rates – for the GHG cost recovery rate, this reflects rates approved in D.24-03-011 (2024 ECAC) and for the ECAC rate, this reflects rates approved in D.23-08-030 (2023 ECAC). Present revenues and resulting rate impacts to be updated pending the outcome of the Company's 2024 ECAC A.23-09-008.

1 base revenues including Projected ECAC. The adders in column 8 include revenues
2 for adjustment schedules that are not a part of base revenues including the present
3 Deferred ECAC and present GHG Surcharge. Column 9 adds columns 7 and 8 to
4 show present revenues net of adders. Pass through adjustments such as the Surcharge
5 to Fund Residential California Alternative Rates for Energy (CARE), CARE
6 discounts, and the California Climate Credit are excluded from revenues in this table.

7 Similarly, for proposed revenues, columns 10 through 14 show the base
8 proposed revenues, proposed Projected ECAC revenues, proposed total base revenues
9 with Projected ECAC, proposed adders including the proposed Deferred ECAC and
10 proposed GHG Surcharge, and proposed net revenues. The proposed base rate change
11 in dollars and percentage is shown by rate schedule in columns 15 and 16. The
12 proposed net rate change in dollars and percentage is shown by rate schedule in
13 columns 17 and 18.

14 VI. AFFORDABILITY METRICS

15 **Q. Please describe the Affordability Metrics.**

16 A. Pursuant to Ordering Paragraphs 5 and 6 of D.22-08-023, as of September 2022,
17 PacifiCorp is required to submit Affordability Metrics for present and proposed
18 revenues in any initial filing in any proceeding with a revenue increase estimated to
19 exceed one percent of present revenues.

20 **Q. Does this application meet the threshold requiring the filing of Affordability**
21 **Metrics?**

22 A. Yes. The expected rate increase from this ECAC filing exceeds the one percent
23 threshold thereby requiring the Company to present Affordability Metrics.

Direct Testimony of Judith M. Ridenour

1 **Q. Have you prepared an exhibit which shows the required metrics?**

2 A. Yes. Exhibit PAC/707 shows the Affordability Metrics.

3 **Q Does this conclude your direct testimony?**

4 A. Yes.

Application No. 24-08-____
Exhibit No. PAC/701
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2025 ECAC

Calculation of Proposed ECAC Adjustment Rates

August 2024

**PACIFICORP
STATE OF CALIFORNIA
CALCULATION OF PROPOSED ECAC ADJUSTMENT RATES**

California Results of Operations June 2021
Net Power Costs
FERC Account Basis for Allocation of ECAC

Line No.	FERC ACCT	Description	PITA Factor	CALIFORNIA Normalized1	Production	Transmission	Demand %	Production Demand	Production Energy	Transmission Demand	Transmission Energy
1	447	Revenue Credits Sales for Resale	SG	\$2,934,765	\$2,934,765	\$0	75%	\$2,201,074	\$733,691	\$0	\$0
		Expenses									
2	501	Fuel Related	SE	\$9,686,965	\$9,686,965	\$0	0%	\$0	\$9,686,965	\$0	\$0
3	503	Steam From Other Sources	SE	\$72,358	\$72,358	\$0	0%	\$0	\$72,358	\$0	\$0
4	547	Fuel	SE	\$4,113,360	\$4,113,360	\$0	0%	\$0	\$4,113,360	\$0	\$0
5	555	Purchased Power	SG	\$9,112,181	\$9,112,181	\$0	75%	\$6,834,136	\$2,278,045	\$0	\$0
6	555	Purchased Power	SE	\$887,277	\$887,277	\$0	0%	\$0	\$887,277	\$0	\$0
7	555	Purchased Power	SSGC	\$0	\$0	\$0	75%	\$0	\$0	\$0	\$0
8	565	Transmission of Electricity by Others	SG	\$1,957,300	\$0	\$1,957,300	75%	\$0	\$0	\$1,467,975	\$489,325
9	565	Transmission of Electricity by Others	SE	\$225,722	\$0	\$225,722	0%	\$0	\$0	\$0	\$225,722
10		Total NPC Accounts		\$23,120,399	\$20,937,377	\$2,183,022		\$4,633,062	\$16,304,315	\$1,467,975	\$715,047
11		Total NPC Factors						20%	71%	6%	3%

CALCULATION OF ECAC ADJUSTMENT RATES

12 Balancing Rate: 0.787 ¢/kWh

Class / Schedule	Description	Forecast 2023 KWH (1)	Balancing Rate (2)	Total Deferred Revenues (3) (1)x(2)	Deferred Revenues by ECAC Factor				Effective kW (8)	Effective kWh (9)	Deferred ECAC	
					Production Demand (4) 20%	Production Energy (5) 71%	Transmission Demand (6) 6%	Transmission Energy (7) 3%			Demand Rate per kW (10) [(4)+(6)]/(8)	Energy Rate per kWh (11) [(5)+(7)]/(9) ²
13	D/DS-8/DM-9 Residential Service	380,297,664	\$0.00787	\$2,992,943	\$599,751	\$2,110,598	\$190,030	\$92,563	380,044,907		0.788 ¢	
14	A-25 Small General Service - < 20 kW	56,165,080	\$0.00787	\$442,019	\$88,576	\$311,708	\$28,065	\$13,670	56,165,051		0.787 ¢	
15	A-32 Small General Service - 20 kW & Over	95,469,986	\$0.00787	\$751,349	\$150,562	\$529,845	\$47,705	\$23,237	459,694	95,467,559	\$0.43	
16	A-36 Large General Service - 100 kW & Over	63,993,857	\$0.00787	\$503,632	\$100,922	\$355,157	\$31,977	\$15,576	144,189	63,986,379	\$0.92	
17	AT-48 Large General Service - 500 kW & Over	74,174,940	\$0.00787	\$583,757	\$116,978	\$411,660	\$37,064	\$18,054	184,502	73,962,253	\$0.83	
18	PA-20 Agricultural Pumping Service	91,000,720	\$0.00787	\$716,176	\$143,513	\$505,041	\$45,472	\$22,149	393,295	91,000,720	\$0.48	
16	OL-15 Outdoor Area Lighting	833,680	\$0.00787	\$6,561	\$1,315	\$4,627	\$417	\$203		221,964	2.956 ¢	
17	OL-42 Airway & Athletic Lighting	116,468	\$0.00787	\$917	\$184	\$646	\$58	\$28		116,468	0.787 ¢	
18	LS-51 Street Lighting, Utility Owned	503,808	\$0.00787	\$3,965	\$795	\$2,796	\$252	\$123		172,306	2.301 ¢	
19	LS-53 Street Lighting, Cust. Owned	818,579	\$0.00787	\$6,442	\$1,291	\$4,543	\$409	\$199		818,579	0.787 ¢	
20	Total	763,374,782		\$6,007,760	\$1,203,886	\$4,236,622	\$381,449	\$185,803	1,181,680	761,956,185		

Notes:

- 1 Billing determinants adjusted for primary discounts, employee discounts, easement discounts and lighting tariff kWh.
- 2 Energy rates for all schedules not billed on demand are designed to collect the total ECAC revenues for that schedule.

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2025 ECAC

GHG Allowance Costs to be Recovered in Rates

[PUBLIC VERSION]

August 2024

PUBLIC VERSION
Exhibit PAC/702
PACIFICORP
STATE OF CALIFORNIA
GHG Allowance Costs to be Recovered in Rates

Line No.	Description	Forecast	Source
1	GHG Allowance Costs		
2	2025	[REDACTED]	Confidential Exhibit PAC/402
3	Gross up for Franchise Fees and Uncollectibles Expense ⁽¹⁾	[REDACTED]	
4	Subtotal Recorded/Forecast Costs	[REDACTED]	
5	Greenhouse Gas Allowance Costs Sub-balancing Account Under / (Over) Collection	[REDACTED]	Confidential Exhibit PAC/403
6	GHG Allowance Costs to be Recovered in Rates	\$ 18,158,508	line 4 + line 5

(1)Factor of 98.42%

CONFIDENTIAL INFORMATION SHADED IN GRAY

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Exhibit No. PAC/703
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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2025 ECAC

GHG Allowance Revenue to be Distributed Through the California Climate Credit

August 2024

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	2025	\$ (21,165,384)	Exhibit PAC/409
3	Gross up for Franchise Fees and Uncollectibles Expense ⁽¹⁾	\$ (334,413)	
4	Subtotal Recorded/Forecast Revenues	\$ (21,499,797)	
5	Greenhouse Gas Allowance Revenue Balancing Account (Under) / Over	\$ (3,230,479)	Exhibit PAC/408
6	Forecast Expenses - 2025		
7	GHG Outreach and Education Costs	\$ 80,000	Exhibit PAC/503
8	GHG Administrative Costs	\$ 7,000	Exhibit PAC/602
9	Gross up for Franchise Fees and Uncollectibles Expense ⁽¹⁾	\$ 1,375	
10	Subtotal Forecast Expenses	\$ 88,375	
11	Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs ⁽²⁾	\$ 1,298,822	Note 2
12	Net GHG Allowance Revenues Available for Return	\$ (23,343,079)	Line 4 + Line 5 + Line 10 + Line 11
13	Summary of California Climate Credit Distribution		
14	EITE Customer Distribution	\$ -	
15	Total Revenue Available for Climate Credit	\$ (23,343,079)	Line 12 - Line 14
16	Estimated Number of Residential Customers Eligible for Climate Credit	36,845	Exhibit PAC/705
17	Estimated Number of Sm. Business Customers Eligible for Climate Cr.	8,156	Exhibit PAC/705
18	Total Estimated Number of Customers Eligible for Climate Credit	45,002	
19	Semi-Annual Per-Customer Climate Credit	\$ (259.36)	Exhibit PAC/705

(1) Factor of 98.42%

(2) Commission Decision (D.) 17-12-022 required PacifiCorp to reserve 10% of the proceeds from the sale of greenhouse gas allowances for use in the Solar on Multifamily Affordable Housing (SOMAH) Program. Decision 22-09-009 modified D.17-12-022 and D.20-04-012 to simplify the process for forecasting and setting aside funding for the SOMAH program, requiring each company to contribute its proportionate share of \$100,000,000 as identified in Tables 1 and 2 of D.22-09-009. A true up for the final three months of the year takes place via an annual joint advice filing by March 1 of the following year.

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OF THE STATE OF CALIFORNIA

PACIFICORP 2025 ECAC

Calculation of Proposed GHG Allowance Costs Surcharge and Climate Credit Rates

August 2024

**PACIFICORP
STATE OF CALIFORNIA
CALCULATION OF PROPOSED GHG ALLOWANCE COSTS SURCHARGE AND CLIMATE CREDIT RATES**

Forecast 12 Months Ending December 2023

Line No.	Description	Sch.	No. of Customers ¹	KWH ²	Present Revenues	2025 GHG Allowance Costs Surcharge			2025 Climate Credit		
						Cost Allocation	Costs	Rate ¢/kWh	Customer Count	Credit Rate	Revenue Distribution
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Residential											
1	Residential Service	D/DL-6	36,570	378,395,267	\$65,905,184		\$9,548,543				(\$18,969,586)
2	Multi-Family - Master Metered	DM-9	16	194,676	\$32,916		\$4,913				(\$8,299)
3	Multi-Family - Submetered	DS-8	259	1,707,721	\$249,218		\$43,093				(\$134,347)
4	Total Residential		<u>36,845</u>	<u>380,297,664</u>	<u>\$66,187,318</u>	52.83%	<u>\$9,596,549</u>	2.523	36,845	\$ (518.71)	<u>(\$19,112,232)</u>
Commercial & Industrial											
5	General Service - < 20 kW	A-25	7,161	56,165,080	\$11,586,973	9.25%	\$1,680,004	2.991	7,161	\$ (518.71)	(\$3,714,727)
6	General Service - 20 kW & Over	A-32	1,272	95,469,986	\$16,014,739	12.78%	\$2,321,989	2.432			
7	General Service - 100 kW & Over	A-36	115	63,993,857	\$8,547,628	6.82%	\$1,239,327	1.937			
8	Large General Service - 500 kW & Over	AT-48	19	74,174,940	\$8,150,426	6.51%	\$1,181,736	1.593			
9	Agricultural Pumping Service - Under 20 kW	PA-20	995	12,926,035	\$14,200,693	11.33%	\$2,058,969	2.263	995	\$ (518.71)	(\$516,120)
10	Agricultural Pumping Service - Over 20 kW	PA-20	1,012	78,074,685							
11	Total Commercial & Industrial		<u>10,574</u>	<u>380,804,583</u>	<u>\$58,500,458</u>		<u>\$8,482,025</u>				<u>(\$4,230,847)</u>
Lighting											
12	Outdoor Area Lighting Service	OL-15	688	221,964	\$243,475	0.19%	\$35,302	15.904			
13	Airway & Athletic Lighting	OL-42	37	116,468	\$30,581	0.02%	\$4,434	3.807			
14	Street Lighting, Utility Owned	LS-51	78	172,306	\$180,812	0.14%	\$26,216	15.215			
15	Street Lighting, Cust. Owned Energy Only	LS-53	127	818,579	\$139,617	0.11%	\$20,243	2.473			
16	Total Lighting		<u>930</u>	<u>1,329,317</u>	<u>\$594,485</u>		<u>\$86,195</u>				
17	Total Sales to Ultimate Consumers		<u>48,349</u>	<u>762,431,564</u>	<u>\$125,282,261</u>		<u>\$18,164,769</u>				<u>(\$23,343,079)</u>
18	Total AGA				\$199,059						
19	Total Employee Discount		69	992,733	(\$42,965)		(\$6,262)				
20	Total Sales (inc. AGA and Employee Discount)		<u>48,349</u>	<u>762,431,564</u>	<u>\$125,438,355</u>		<u>\$18,158,508</u>		45,002	\$ (518.71)	<u>(\$23,343,079)</u> Annual Amount
									\$	(259.36)	semi-annually, per customer

Notes:

- 1 Customer counts for Schedules DM-9 and DS-8 adjusted to reflect submeter and tenant counts.
- 2 KWH for certain lighting adjusted to reflect tariff KWH.

Application No. 24-08-____
Exhibit No. PAC/705
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2025 ECAC

Commission Template D-1 – Annual Allowance Revenue Receipts and Customer Returns

[PUBLIC VERSION]

August 2024

PUBLIC VERSION
Exhibit PAC/705
PACIFICORP
STATE OF CALIFORNIA
Commission Template D-1
Annual Allowance Revenue Receipts and Customer Returns

Line Description	2022		2023		2024		2025		Support
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	
1 Proxy GHG Price (\$/MT)	\$ 19.36	N/A	\$ 32.86	N/A	\$ 35.18	N/A	\$ 40.41		
2 Allocated Allowances (MT)	550,696		544,824		529,519		523,766		Testimony and Exhibits of M. Wilding PAC/400-409
3 Revenues (\$)									
4 Prior Balance	(2,015,253)	(3,804,227)	(7,218,150)	(6,376,199)	1,658,287	488,029	(3,230,479)		
5 Allowance Revenue	(10,661,475)	(15,563,147)	(17,902,917)	(17,848,799)	(18,628,478)	(20,291,796)	(21,165,384)		
6 Interest		(214,109)		(491,463)			(403,936)		
7 Franchise Fees and Uncollectibles	(215,617)	(319,079)	(362,068)	(370,913)	(376,742)	(418,550)	(334,413)		
8 Subtotal Revenues	(12,892,345)	(19,900,562)	(25,483,135)	(25,087,374)	(17,346,933)	(20,626,253)	(24,730,276)		
9 Expenses (\$)									
10 Outreach and Administrative Expenses (from Template D3)	85,000	54,163	85,000	66,468	85,000	85,000	87,000		Testimony and Exhibits of O. Granados & A. Lillie PAC/500-504 and PAC/600-603
11 Franchise Fees and Uncollectibles	1,719	1,095	1,719	1,344	1,719	1,719	1,375		
12 Interest	-	-	-	-	-	-	-		
13 Subtotal Expenses	86,719	55,258	86,719	67,812	86,719	86,719	88,375		
14 Total Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (\$ (Sum of Lines 14a through 14c))	1,066,147	1,556,315	1,665,648	1,500,340	1,862,848	1,298,822	1,298,822		
14a Clean Energy Program SOMAH Set Aside (Note 1)	1,066,147	1,556,315	1,790,292	1,784,880	1,862,848	1,298,822	1,298,822		Test. & Exhb. of J. Ridenour PAC/700-708
14b Clean Energy Program SOMAH Prior Years' True up			(124,644)	(284,540)					
14c Reserved for future use									
15 Net GHG Revenues (\$ (Line 8 + Line 13 + Line 14))	(11,739,478)	(18,288,989)	(23,730,768)	(23,519,222)	(15,397,367)	(19,240,712)	(23,343,079)		
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)	(18,288,989)	(23,730,768)	(23,519,222)	(15,397,367)	(19,240,712)	(23,343,079)		
18 GHG Revenue Returned to Eligible EITE Customers (\$)									
19 EITE Customer Return	-	-	-	-	-	-	-		Testimony and Exhibits of Judith M. Ridenour PAC/700-708
20 Semi-Annual Climate Credit									
21 Number of Eligible Residential Bundled Household:	36,049	36,582	36,049	36,469	36,049	37,484	36,845		
22 Number of Eligible Residential Unbundled Household:									
23 Number of Eligible Small Business Customers:	8,133	8,253	8,133	8,228	8,133	8,457	8,156		
24 Total Customers Eligible for Climate Credit	44,182	44,835	44,182	44,697	44,182	45,940	45,002		
25 Per-Customer Semi-Annual Climate Credit (\$ (0.5 x (Line 17 + 19) ÷ Line 24))	132.85	132.85	268.56	268.56	174.25	174.25	259.36		
26 Total Revenue Distributed for the Climate Credit (\$ (2 x Line 24 x Line 25))	11,739,478	11,912,790	23,730,768	24,007,251	15,397,367	16,010,233	23,343,079		
27 Revenue Balance (\$)	N/A	(6,376,199)	N/A	488,029	N/A	(3,230,479)	N/A		

Note 1: Commission Decision (D.) 17-12-022 required PacifiCorp to reserve 10% of the proceeds from the sale of greenhouse gas allowances for use in the Solar on Multifamily Affordable Housing (SOMAH) Program. Decision 22-09-009 modified D.17-12-022 and D.20-04-012 to simplify the process for forecasting and setting aside funding for the SOMAH program, requiring each company to contribute its proportionate share of \$100,000,000 as identified in Tables 1 and 2 of D.22-09-009. A true up for the final three months of the year takes place via an annual joint advice filing by March 1 of the following year.

Note 2: In accordance with ordering paragraph 4 of D.22-09-009, the true-up for the final three months of each year shall occur via a joint Tier 1 advice letter. While the Company filed Advice Letter 712-E on March 28, 2023 to true up the SOMAH set aside for 2022, PacifiCorp inadvertently failed to add the true up for 2022 in the Company's 2024 ECAC (A.23-09-008). The Clean Energy Program SOMAH Prior Years' True up - 2023 Recorded - represents the following:

2021 True-up: (\$124,644) see Advice Letter 679-E
2022 True-up: \$490,168 see Advice Letter 712-E
2023 True-up: (\$650,064) see Advice letter 732-E

CONFIDENTIAL INFORMATION SHADED IN GRAY

Application No. 24-08-____
Exhibit No. PAC/706
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2025 ECAC

Estimated Effects of Proposed Rate Change Distributed by Rate Schedule

August 2024

PACIFICORP
STATE OF CALIFORNIA
ESTIMATED EFFECTS OF PROPOSED RATE CHANGE
DISTRIBUTED BY RATE SCHEDULE
Forecast 12 Months Ending December 2023

Line No.	Description (1)	Pres. Sch. (2)	No. of Customers (3)	KWH (4)	Present Revenues					Proposed Revenues					Proposed Change		Net Proposed Change		Line No.
					Base Revenue (5)	ECAC (6)	ECAC (7)	ECAC (7)+(6)	Adders ¹ (8)	Net Revenue (9)	Net Revenue (9)+(8)	Base Revenue (10)	ECAC (11)	ECAC (12)	ECAC (12)+(11)	Adders ¹ (13)	Net Revenue (14)	Net Revenue (14)+(13)	
Residential																			
1	Residential Service	D	24,923	255,351,777	\$36,587,516	\$8,007,689	\$44,595,205	\$6,914,803	\$51,510,008	\$36,587,516	\$8,007,689	\$44,595,205	\$9,910,027	\$54,505,232	\$0	0.0%	\$2,995,224	5.8%	1
2	Residential Service - CARE	DL-6	11,647	123,043,490	\$17,451,335	\$3,858,644	\$21,309,979	\$3,332,019	\$24,641,998	\$17,451,335	\$3,858,644	\$21,309,979	\$4,775,319	\$26,085,298	\$0	0.0%	\$1,443,300	5.9%	1
3	Multi-Family - Master Metered	DM-9	6	194,676	\$26,811	\$6,105	\$32,916	\$5,270	\$38,186	\$26,811	\$6,105	\$32,916	\$7,554	\$40,470	\$0	0.0%	\$2,284	6.0%	1
4	Multi-Family - Submetered	DS-8	20	1,707,721	\$195,664	\$53,554	\$249,218	\$46,246	\$295,464	\$195,664	\$53,554	\$249,218	\$66,278	\$315,496	\$0	0.0%	\$20,032	6.8%	2
5	Total Residential		36,596	380,297,664	\$54,261,326	\$11,925,992	\$66,187,318	\$10,298,338	\$76,485,656	\$54,261,326	\$11,925,992	\$66,187,318	\$14,759,178	\$80,946,496	\$0	0.0%	\$4,460,840	5.8%	3
Commercial & Industrial																			
6	General Service - < 20 kW	A-25	7,161	56,165,080	\$9,827,322	\$1,759,651	\$11,586,973	\$1,833,226	\$13,420,199	\$9,827,322	\$1,759,651	\$11,586,973	\$2,504,399	\$14,091,372	\$0	0.0%	\$671,173	5.0%	4
7	General Service - 20 kW & Over	A-32	1,272	95,469,986	\$13,068,168	\$2,946,571	\$16,014,739	\$2,534,765	\$18,549,504	\$13,068,168	\$2,946,571	\$16,014,739	\$3,597,266	\$19,612,005	\$0	0.0%	\$1,062,501	5.7%	5
8	General Service - 100 kW & Over	A-36	115	63,993,857	\$6,581,921	\$1,965,707	\$8,547,628	\$1,356,964	\$9,904,592	\$6,581,921	\$1,965,707	\$8,547,628	\$2,022,813	\$10,570,441	\$0	0.0%	\$665,849	6.7%	6
9	Large General Service - 500 kW & Over	AT-48	19	74,174,940	\$5,845,429	\$2,305,177	\$8,150,626	\$1,238,550	\$9,389,176	\$5,845,429	\$2,305,177	\$8,150,626	\$2,028,079	\$10,178,505	\$0	0.0%	\$789,529	8.4%	7
10	Agricultural Pumping Service	PA-20	2,007	91,000,720	\$11,372,142	\$2,828,550	\$14,200,693	\$2,292,988	\$16,493,681	\$11,372,142	\$2,828,550	\$14,200,693	\$3,276,437	\$17,477,130	\$0	0.0%	\$983,449	6.0%	8
11	Total Commercial & Industrial		10,574	380,804,583	\$46,694,802	\$11,805,656	\$58,500,458	\$9,256,493	\$67,756,951	\$46,694,802	\$11,805,656	\$58,500,458	\$13,428,994	\$71,929,452	\$0	0.0%	\$4,172,501	6.2%	9
Lighting																			
12	Outdoor Area Lighting Service	OL-15	688	833,680	\$236,470	\$7,005	\$243,475	\$20,921	\$264,396	\$236,470	\$7,005	\$243,475	\$54,571	\$298,046	\$0	0.0%	\$33,650	12.7%	10
13	Airway & Athletic Lighting	OL-42	37	116,468	\$26,932	\$3,649	\$30,581	\$4,413	\$34,994	\$26,932	\$3,649	\$30,581	\$6,294	\$36,875	\$0	0.0%	\$1,881	5.4%	11
14	Street Lighting, Utility Owned	LS-51	78	503,808	\$175,407	\$5,405	\$180,812	\$17,191	\$198,003	\$175,407	\$5,405	\$180,812	\$39,810	\$220,622	\$0	0.0%	\$22,619	11.4%	12
15	Street Lighting, Cust. Owned Energy Only	LS-53	127	818,579	\$113,976	\$25,641	\$139,617	\$19,433	\$159,050	\$113,976	\$25,641	\$139,617	\$28,125	\$167,742	\$0	0.0%	\$8,692	5.5%	13
16	Total Lighting		930	2,272,535	\$552,785	\$41,700	\$594,485	\$61,958	\$656,443	\$552,785	\$41,700	\$594,485	\$128,800	\$723,285	\$0	0.0%	\$66,842	10.2%	14
17	Total Sales to Ultimate Consumers		48,100	763,374,782	\$101,508,913	\$23,773,348	\$125,282,261	\$19,616,789	\$144,899,050	\$101,508,913	\$23,773,348	\$125,282,261	\$28,316,972	\$153,599,233	\$0	0.0%	\$8,700,183	6.0%	15
18	Total AGA				\$199,059		\$199,059		\$199,059	\$199,059		\$199,059		\$199,059	\$0	0.0%	\$0	0.0%	16
19	Total Employee Discount				(\$35,182)	(\$7,783)	(\$42,965)	(\$6,721)	(\$49,686)	(\$35,182)	(\$7,783)	(\$42,965)	(\$9,632)	(\$52,597)	\$0	0.0%	(\$2,911)	5.9%	17
20	Total Sales (inc. AGA and Employee Discount)		48,100	763,374,782	\$101,672,790	\$23,765,565	\$125,438,355	\$19,610,068	\$145,048,423	\$101,672,790	\$23,765,565	\$125,438,355	\$28,307,340	\$153,745,695	\$0	0.0%	\$8,697,272	6.0%	18

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 Program Costs, Schedule S-96 Surcharge to Recover Costs Recorded in Catastrophic Event Memorandum Account, Schedule S-98 Revenue Requirement Memorandum Account Adjustment, 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.

Application No. 24-08-____
Exhibit No. PAC/707
Witness: Judith M. Ridenour

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFICORP 2025 ECAC

Essential Usage and Average Usage Bills, Affordability Ratios and Hours at Minimum Wage by
Climate Zone

August 2024

PacifiCorp
Present and Proposed
Essential Usage and Average Usage Monthly Bills, Affordability Ratios and Hours at Minimum Wage by Climate Zone
Schedule D and DL-6
Standard Residential Service and CARE Residential Service

Climate Zone	Usage Type	kWh	Monthly Bill				Affordability Ratio 20				Affordability Ratio 50				Hours at Minimum Wage			
			Present Total \$	Proposed Total \$	Change Total \$	Change %	Present AR 20	Proposed AR 20	Change AR 20	Change % AR 20	Present AR 50	Proposed AR 50	Change AR 50	Change % AR 50	Present HM	Proposed HM	Change HM	Change % HM
Schedule D Standard Residential Essential Monthly Usage Bills by Climate Zone																		
California Hourly Minimum Wage: \$16.00																		
Del Norte	Basic Use	659	\$133.41	\$141.14	\$7.73	5.8%												
	All Electric	838	\$166.88	\$176.71	\$9.83	5.9%												
	Weighted Average		\$159.75	\$169.13	\$9.38	5.9%	12.18	12.65	0.47	3.9%	3.79	3.93	0.14	3.7%	9.98	10.57	0.59	5.9%
All Other Territory	Basic Use	588	\$120.13	\$127.03	\$6.90	5.7%												
	All Electric	786	\$157.16	\$166.38	\$9.22	5.9%												
	Weighted Average		\$141.10	\$149.31	\$8.21	5.8%	11.18	11.61	0.43	3.8%	3.37	3.49	0.12	3.6%	8.82	9.33	0.51	5.8%
Schedule DL-6 CARE Residential Essential Monthly Usage Bills by Climate Zone																		
Del Norte	Basic Use	659	\$97.23	\$103.03	\$5.80	6.0%												
	All Electric	838	\$121.57	\$128.95	\$7.38	6.1%												
	Weighted Average		\$116.39	\$123.43	\$7.04	6.0%	8.87	9.23	0.36	4.1%	2.76	2.87	0.11	4.0%	7.27	7.71	0.44	6.0%
All Other Territory	Basic Use	588	\$87.58	\$92.75	\$5.17	5.9%												
	All Electric	786	\$114.50	\$121.42	\$6.92	6.0%												
	Weighted Average		\$102.83	\$108.99	\$6.16	6.0%	8.15	8.48	0.33	4.0%	2.46	2.55	0.09	3.7%	6.43	6.81	0.39	6.0%
Schedule D Standard Residential Average Monthly Usage Bills by Climate Zone																		
Del Norte	Basic Use	849	\$173.84	\$183.80	\$9.96	5.7%												
	All Electric	938	\$188.16	\$199.16	\$11.00	5.8%												
All Other Territory	Basic Use	781	\$161.20	\$170.37	\$9.16	5.7%												
	All Electric	890	\$179.29	\$189.73	\$10.44	5.8%												
Schedule DL-6 CARE Residential Average Monthly Usage Bills by Climate Zone																		
Del Norte	Basic Use	849	\$126.74	\$134.21	\$7.47	5.9%												
	All Electric	938	\$137.10	\$145.36	\$8.26	6.0%												
All Other Territory	Basic Use	781	\$117.56	\$124.43	\$6.87	5.8%												
	All Electric	890	\$130.65	\$138.49	\$7.84	6.0%												

Note: Weighted Average Essential Bills and Affordability Ratio values based on results from the 2022 Affordability Calculator 10/1/23 version. Year assumptions: Present 2024; Proposed 2025
California Minimum Wage source: <https://www.dir.ca.gov/dlse/>