

PRELIMINARY STATEMENT (Continued)

PART C

Memorandum Accounts

1. PURPOSE

The purpose of a Memorandum Account is to record all costs incurred by the Company for Specified Projects authorized by the Commission. Currently authorized Specified Projects are set forth in Section 2.C.

2. DEFINITIONS

a. Authorization Date:

The Authorization Date shall be the date on which the Commission authorizes the Company to begin recording costs for a Specified Project in a memorandum account.

b. Interest Rate:

The Interest Rate shall be 1/12 of the most recent month's interest rate on Commercial Paper (prime, 3 months), published in the Federal Reserve Statistical Release, G.13. Should publication of the interest rate on Commercial Paper (prime, 3 months) be discontinued, interest shall so accrue at the rate of 1/12 of the most recent month's interest rate on Commercial Paper which is published in the Federal Reserve Statistical Release, G.13, or its successor publication.

c. Specified Project:

A Specified Project is a project authorized by the Commission for inclusion in a memorandum account. Specified Projects authorized by the Commission are listed below:

<u>Interest Bearing Specified Project</u>	<u>Memorandum Account*</u>
(1) Catastrophic Event	Yes
(2) Powerdale Decommissioning Cost Memorandum Account	Yes
(3) Fire Hazard Prevention Memorandum Account	Yes
(4) Repairs Deduction Memorandum Account	Yes
(5) Tax Relief, Unemployment Insurance Authorization, and Job Creation Act of 2010 (New Tax Law) Memorandum Account	Yes
(6) Assembly Bill (AB) 32 Implementation Costs Memorandum Account	Yes
(7) Bridge Funding Memorandum Account	Yes
(8) Greenhouse Gas Allowance Revenue Administrative Cost Memorandum Account	Yes
(9) Greenhouse Gas Allowances Customer Outreach Costs Memorandum Account	Yes
(10) Carbon Decommissioning Cost Memorandum Account	Yes
(11) Joy Longwall Memorandum Account (JLMA)	Yes
(12) Net Metering Aggregation Memorandum Account	Yes
(13) Tax Reform Memorandum Account	Yes
(14) Emergency Customer Protections Memorandum Account (ECPMA)	Yes
(15) Fire Risk Mitigation Memorandum Account (FRMMA)	Yes
(16) Officer Compensation Memorandum Account (OCMA)	No
(17) Wildfire Mitigation Plan Memorandum Account (WMPMA)	Yes
(18) Tax Memorandum Account (TMA)	Yes

\* Interest shall accrue monthly to interest-bearing Memorandum Accounts by applying the Interest Rate to the average of the beginning and ending balance.

(Continued)

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TF6 STMT-5.E		Title		Resolution No.	<u>                    </u>

PRELIMINARY STATEMENT (Continued)  
PART C

3. CATASTROPHIC EVENT MEMORANDUM ACCOUNT (CEMA)

The purpose of the CEMA is to record all costs incurred by the Company associated with a Catastrophic Event for:

- (1) restoring utility service to the Company's Customers;
- (2) repairing, replacing, or restoring damaged utility facilities; and
- (3) complying with governmental agency orders.

Entries to the CEMA shall be made at the end of each month commencing with the month in which the Catastrophic Event occurs.

If a Catastrophic Event occurs, the Company shall, if possible, inform the Executive Director by letter within 30 days after the Catastrophic Event, if the Company has started booking costs into CEMA. Copies of the letter shall be mailed to the Director of the Commission Advisory & Compliance Division (CACD), and the Branch Chief of the CACD. The letter shall specify the Catastrophic Event, date, time, location, service areas affected, impact on the Company's facilities, and an estimate of the extraordinary costs expected to be incurred. Costs due to expense and capital items shall be shown separately.

Costs recorded in the CEMA may be recovered in rates only after a request by the Company, showing of reasonableness, and approval by the Commission. Such a request may be made by a formal application specifically for that purpose, by inclusion in a subsequent general rate case or other rate setting request.

4. POWERDALE DECOMMISSIONING COST MEMORANDUM ACCOUNT (PDCMA)

The purpose of this memorandum account is to record decommissioning costs associated with the 6-MW Powerdale generation facility, located in Hood River County, Oregon. Recovery in rates and allocation of recorded costs recorded in the PDCMA may occur only after PacifiCorp has made a formal request and showing of reasonableness, and approval by the Commission. PacifiCorp's request shall be made by formal application, specifically by the inclusion in a future general rate case or other rate setting application.

Entries made to the PDCMA at the end of the month shall be the total costs of the decommissioning project as allocated to the California jurisdiction.

Interest will accrue monthly to the PDCMA by applying one-twelfth of the interest rate to the average of the beginning and ending balance in the PDCMA. The Interest Rate shall be the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release.

(Continued)

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		Title		

PRELIMINARY STATEMENT (Continued)

PART C

5. FIRE HAZARD PREVENTION MEMORANDUM ACCOUNT (FHPMA)

In compliance with Commission Decision 09-08-029, the purpose of this account is to record costs associated with fire hazard prevention measures adopted in Rulemaking 08-11-005 and its successor proceeding, Rulemaking 15-05-006 that have not been previously authorized for recovery in a general rate case or other regulatory proceeding. These costs may include expenses related to the implementation of fire hazard prevention measures governed by General Order (GO) 95, GO 165, and any other expenses incurred in implementing fire hazard prevention measures adopted in Rulemaking 08-11-005 and Rulemaking 15-05-006.

Entries made to the FHPMA at the end of the month shall be the total costs associated with complying with the measures described above. Interest will accrue monthly to the FHPMA by applying one-twelfth of the interest rate to the average of the beginning and ending balance in the FHPMA. The interest rate shall be the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release.

(Continued)

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TF6 STMT-7.E			Resolution No.	_____

PRELIMINARY STATEMENT (Continued)  
PART C

6. ASSEMBLY BILL (AB) 32 IMPLEMENTATION COSTS MEMORANDUM ACCOUNT

In compliance with Commission Decision 12-03-022, the purpose of this account is to record the California Air Resources Board (CARB) implementation fees and AB 32 mandatory reporting and verification costs required to implement AB 32 that are included in PacifiCorp's 2012 Energy Cost Adjustment Clause Application 11-08-001 and costs that have been or will be incurred in calendar year 2011 and beyond.

The Company may seek to recover costs recorded in this memorandum account once the Commission makes its ultimate disposition of the appropriate mechanisms for the allocation and recovery of the AB 32 costs and revenues. Costs may be included in rates only after a request by the Company establishing that: the costs recorded in the memorandum account have not been recovered through otherwise authorized rates; recovery of the types of costs recorded in the account is reasonable; the utility acted prudently when it incurred these costs; and the level of costs is reasonable.

In addition, the Company shall show whether recovery of costs incurred before the creation of this account is consistent with the precedent stated in the Southern California Water Co. Headquarters case, D.92-03-094 (March 31, 1992) 43 Cal. PUC 2d 596, 600.

7. BRIDGE FUNDING MEMORANDUM ACCOUNT (BFMA)

The purpose of the BFMA is to record the difference between the adopted bridge funding revenue requirements for the California Alternate Rates for Energy Program and the Energy Savings Assistance (ESA) Program in Commission Decision No. D.12-06-023 and D.12-09-026 and the proposed revenue requirements request in Application No. 11-06-016 (consolidated) beginning January 1, 2012 until a final decision is issued in this consolidated proceeding.

Costs will be recovered from customers in the same manner as the Company's authorized CARE/ESA program revenue requirement. Costs recorded in the BFMA will be reconciled with the Company's expenses and revenues recorded in the Company's CARE and Low Income Energy Efficiency (LIEE) Program (now referred to as ESA) balancing accounts and will accrue interest as set forth in the Preliminary Statement Section D LIEE Balancing Account 3 (b). Once all authorized budget cycle program costs have been recorded, the balance in this account will be reported in a supplemental filing to A.11-06-016 for final disposition or as otherwise authorized by the Commission.

(Continued)

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PRELIMINARY STATEMENT (Continued)  
PART C

10. NET METERING AGGREGATION MEMORANDUM ACCOUNT

In compliance with Resolution E-4854, the purpose of this memo account is to track costs for net energy metering aggregation (NEMA) billing for one year from the effective date of the NEMA tariff changes filed for approval in PacifiCorp Advice Letter 554-E. Costs recorded may include the cost of automating the NEMA billing system if such automation is more cost effective for NEMA customers than manual billing.

After one year from the effective date of the NEMA tariff, PacifiCorp may file a Tier 3 advice letter, if necessary, proposing modifications to the billing service fees. The filing must include detailed justification for the proposed fees. Should the fee structure change, existing customers shall not be retroactively charged or debited and the new fees shall apply to all NEMA customers (new and existing) on a going forward basis. If the costs are significantly higher than the current fee structure recovers, PacifiCorp should consider spreading cost recovery of any fees over a reasonable period of time to ensure that customers do not face an upfront cost hurdle that acts as a barrier to participation in NEMA. In the event of over-collection, PacifiCorp may provide a refund to NEMA customers for the amount of over-collection.

Interest will accrue monthly to the NEMA memo account by applying one-twelfth of the interest rate to the average of the beginning and ending balance in the NEMA memo account. The interest rate shall be the interest rate on the three-month commercial paper for the previous month, as reported in the Federal Reserve statistical release.

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PRELIMINARY STATEMENT (Continued)  
PART C

11. Tax Reform Memorandum Account

I. Purpose

The Tax Reform Memorandum Account will track the expected income tax impacts associated with the Federal "To provide for reconciliation pursuant to titles II and V of the concurrent resolution on the budget for fiscal year 2018", H.R. 1 (Tax Act) signed into law on December 22, 2017.

II. Applicability

The Tax Reform Memorandum Account shall apply to all customers unless otherwise specified by the Commission.

III. Accounting Procedures

The Tax Reform Memorandum Account will record the deferred amounts related to the reduction in federal corporate income tax rate recorded in FERC Account 254 - Other regulatory liabilities with the corresponding entry to FERC Accounts 440, 442 and 444 (Operating Revenues) and related income tax effects recorded in FERC 190 (Accumulated Deferred Income Taxes), FERC 236 (Taxes Accrued), FERC 409.1 - Income Taxes-Utility Operating Income and FERC 411.1 - Provision for Deferred Income Taxes - Credit, Utility Operating income. In addition, the Tax Reform Memorandum Account would include deferred amounts related to excess deferred income tax liabilities recorded in FERC Account 254 - Other Regulatory Liabilities and FERC Account FERC 182 - Other Regulatory Assets with offsetting amounts to FERC 190 - Accumulated Deferred Income Taxes, FERC 281 (Accumulated Deferred Income Taxes - Accelerated Amortization), FERC 282 - Accumulated Deferred Income Taxes - Other Property, and FERC 283 - Accumulated Deferred Income Taxes - Other in the Tax Reform Memorandum Account. Analysis of the impacts of the Tax Act is continuing and there may be other Tax Act-related impacts recorded in the Tax Reform Memorandum Account.

Interest will accrue monthly to the Tax Reform Memorandum Account by applying one-twelfth of the interest rate to the average of the beginning and ending balance in the Tax Reform Memorandum Account. The Interest Rate shall be the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

IV. Disposition

Rate-making treatment of the amounts recorded in the Tax Reform Memorandum Account will be determined only after a request by the Company in a subsequent proceeding, a showing of the reasonableness of the tax impacts, and approval by the Commission. Such a request may be made by a formal application specifically for that purpose, by inclusion in a subsequent general rate case, or other rate-setting request.

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PRELIMINARY STATEMENT (Continued)  
PART C

12. Emergency Customer Protections Memorandum Account (ECPMA)

I. Purpose

Pursuant to D.18-08-004 (Decision), the purpose of the Emergency Customer Protections Memorandum Account (ECPMA) is to record costs associated with the Emergency Customer Protection Plan for eligible customers, as described in Rule 1 under the Emergency Customer Protection Plan definition, in areas where a state of emergency proclamation is issued by the Governor of California due to a disaster that affects utility service. Entries in the ECPMA must be segregated by qualifying event as described in Rule 1 under the Emergency Customer Protection Plan definition. The emergency customer protections and the ECPMA will remain in effect for one year following the proclamation of a state of emergency, or until utility service is restored, to record costs related to the state of emergency declared by the Governor of the State of California.

II. Applicability

Applies to all customer classes, except for those schedules or contracts specifically excluded by the Commission.

III. Accounting Procedure

The following entries will be made each month, or as applicable, excluding an allowance for franchise fees and uncollectibles.

- 1. A debit entry equal to the incremental actual expenses as authorized by the Commission to be recorded to this account;
- 2. A debit entry equal to any incremental operations and maintenance charges associated with implementation of this Decision;
- 3. A debit entry equal to the revenue and fees shortfalls resulting from implementation of this Decision;
- 4. A debit or (credit) entry equal to any amounts authorized by the Commission to be recorded to this account;
- 5. A debit or (credit) entry equal to the capital-related revenue requirement related to the actual capital costs incurred if any. Capital-related revenue requirements include depreciation expense, the return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
- 6. A debit or (credit) entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission; and
- 7. An entry equal to the interest on the average of the balance in this account at the beginning of the month and the balance in this account after the above entries at a rate equal to one-twelfth the interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

IV. Disposition and Review

Disposition of the balances in this account will be determined through a general rate case, application, or other appropriate filing, or as otherwise authorized by the commission.

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Name

Decision No. \_\_\_\_\_ VP, Regulation Effective December 1, 2020

Title



PRELIMINARY STATEMENT (Continued)  
PART C

13. Fire Risk Mitigation Memorandum Account (FRMMA)

In compliance with Senate Bill 901 and Public Utilities Code Section 8386(j), the purpose of the Fire Risk Mitigation Memorandum Account (FRMMA) is to record incremental costs of fire risk mitigation work that is not otherwise recovered in PacifiCorp's adopted revenue requirements. Such costs shall include, but are not limited to, expense and capital expenditures for: advanced system hardening and resiliency; expanded automation and protection; improved wildfire detection; enhanced event response capacity, and vegetation management activities. Costs recorded to the FRMMA will not include costs approved for recovery in PacifiCorp's General Rate Cases (GRCs) or recovered through PacifiCorp's Catastrophic Event Memorandum Account (CEMA), Fire Hazard Prevention Memorandum Account (FHPMA) or other cost recovery mechanisms. The FRMMA applies to all customer classes, except for those specifically excluded by the Commission.

Entries made to the FRMMA will be the costs associated with complying with the measures described above. Interest will accrue monthly to the FRMMA by applying one-twelfth of the interest rate to the average of the beginning and ending balance in the FRMMA. The interest rate shall be the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release. Entries made to the FRMMA will only be authorized for recovery through a subsequent application or through other appropriate filings as authorized by the commission.

14. Tax Memorandum Account (TMA)

The purpose of this memorandum account is to track differences between tax expenses forecasted and tax expenses incurred, specifically resulting from 1) net revenue changes, 2) mandatory tax law changes, tax accounting changes, tax procedural changes, or tax policy changes, and 3) elective tax law changes, tax accounting changes, tax procedural changes, or any tax policy changes.

Interest will accrue monthly to the TMA by applying one-twelfth of the interest rate to the average of the beginning and ending balance in the TMA. The interest rate shall be the interest rate on the three-month commercial paper for the previous month, as reported in the Federal Reserve statistical release.

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Title

TF6 STMT-13.E

Resolution No. \_\_\_\_\_

PRELIMINARY STATEMENT (Continued)  
PART C

19. OFFICER COMPENSATION MEMORANDUM ACCOUNT (OCMA)

1. PURPOSE:

The OCMA is a memorandum account established pursuant to Public Utilities Code Section 706, as enacted by Senate Bill 901 (2018, Dodd). Public Utilities Code Section 706 requires, among other things, that all forms of compensation for officers of electrical or gas corporations shall be paid solely by shareholders. The purpose of the OCMA is to track the difference between (1) California-allocated compensation for officers of the utility that is authorized in General Rate Cases (GRCs) or resolutions and; (2) all California-allocated compensation as defined by Public Utilities Code Section 706. The term "officer" shall be defined as those employees of the investor owned utilities in positions with titles of Vice President or above, consistent with Rule 240.3b-7 of the Securities Exchange Act.

2. APPLICABILITY:

The OCMA is effective January 1, 2019, until closed at the direction of the Commission.

3. ACCOUNTING PROCEDURE:

The OCMA consists of two sub-accounts:

The "Authorized Compensation Sub-Account" tracks California-allocated salaries, bonuses, benefits, and all other consideration of any value paid to officers in rates as authorized in the decision approving PacifiCorp's 2019 General Rate Case A.18-04-002.

The "Total Compensation Sub-Account" tracks California-allocated salaries, bonuses, benefits, and all other consideration of any value paid to officers.

Salaries: Payroll data for Executive Officer base salaries.

Bonuses: Annual incentive plan compensation (AIP).

Benefits: Employer portion of health and welfare premiums.

Other Consideration: California-allocated executive perquisites in payroll data and/or invoices, 401(k) company match, company funded deferred compensation.

PacifiCorp shall maintain this account by making monthly entries (or annual entries where applicable and monthly data is not available) as follows:

A. Authorized Compensation Sub-Account

1. A credit entry equal to the California-allocated salaries, bonuses, benefits, and all other consideration of any value set aside to be paid to its officers as authorized in the decision

<sup>1</sup> Resolution E-4963 confirms that for multijurisdictional utilities such as PacifiCorp, the OCMA applies only to officer compensation applicable to California operations.

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Advice Letter No. 579-E Etta Lockey Date Filed December 24, 2018

Name

Decision No. \_\_\_\_\_ VP, Regulation Effective January 1, 2019

Title

TF6 STMT-13b.E Resolution No. \_\_\_\_\_

PRELIMINARY STATEMENT (Continued)  
PART C

19. OFFICER COMPENSATION MEMORANDUM ACCOUNT (OCMA) (continued)

3. ACCOUNTING PROCEDURE: (continued)

B. Total Compensation Sub-Account

- 1. A debit entry equal to the California-allocated salaries, bonuses, benefits, and all other consideration of any value paid to its officers.

4. DISPOSITION

Amounts tracked in the OCMA may be addressed in PacifiCorp's GRC or other appropriate Commission proceeding and should be refunded to customers in rates.

20. WILDFIRE MITIGATION PLAN MEMORANDUM ACCOUNT (WMPMA)

The Wildfire Mitigation Plan Memorandum Account (WMPMA) is established in compliance with Commission Decision (D.) 19-05-040 (Decision), Senate Bill 901, Assembly Bill 1054, and Public Utilities Code Section 8386.4(a) which states "At the time of approval of an electric corporation's wildfire mitigation plan, the commission shall authorize the electrical corporation to establish a memorandum account to track costs incurred to implement the plan." The purpose of the WMPMA is to record incremental costs of fire risk mitigation work incurred to implement the commission-approved PacifiCorp wildfire mitigation plan that are not otherwise recovered in PacifiCorp's revenue requirement. Such costs shall include, but are not limited to, expense and capital expenditures for: increased inspections and patrols; system hardening and resiliency; expanded automation and protection; improved situational awareness and wildfire detection; enhanced event response capacity, and vegetation management activities. The Commission approved PacifiCorp's wildfire mitigation plan on May 30, 2019. The WMPMA tracks all incremental costs incurred to implement the plan after the date the plan was approved. Costs recorded to the WMPMA will not include costs approved for recovery in PacifiCorp's General Rate Cases (GRCs), or recovered through PacifiCorp's Catastrophic Event Memorandum Account (CEMA), Fire Hazard Prevention Memorandum Account (FHPMA), Fire Risk Mitigation Memorandum Account (FRMMA), or other cost recovery mechanisms. The WMPMA applies to all customer classes, except for those specifically excluded by the Commission.

Interest will accrue monthly to the WMPMA by applying one-twelfth of the interest rate to the average of the beginning and ending balance in the WMPMA. The interest rate shall be the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release. Entries made to the WMPMA will only be authorized for recovery through a subsequent application or through other appropriate filings as authorized by the commission.

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Decision No. D.19-05-040 VP, Regulation Effective June 4, 2019

Title

PRELIMINARY STATEMENT (Continued)  
PART C

21. Pension Liability Memo Account (PLMA)

The purpose of this memorandum account is to record gains and losses from pension and post-retirement settlements and curtailments measured and recognized in accordance with Generally Accepted Accounting Principles (GAAP). Recovery in rates and allocation of costs recorded in the PLMA may occur only after PacifiCorp has made a formal request and showing of reasonableness, and approval by the Commission. PacifiCorp's request shall be made by formal application, specifically by the inclusion in a future general rate case or other rate setting application.

Interest will accrue monthly to the PLMA by applying one-twelfth of the interest rate to the average of the beginning and ending balance in the PLMA. The interest rate shall be the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release. Entries shall be made to the PLMA in the period the gains and losses are recognized in accordance with GAAP and as allocated to the company's California jurisdiction.

22. CHOLLA UNIT 4 RETIREMENT AND DECOMMISSIONING COST MEMORANDUM ACCOUNT (CRDMA)

The purpose of this memorandum account is to record costs associated with the closure of the Cholla Unit 4 facility. Costs recorded in the CRDMA will include the unrecovered plant balance, including related construction work-in-progress (CWIP); other closure related costs such as unused materials and supply (M&S) inventory, employee severance, liquidated damages related to the early termination of the related coal supply agreement (CSA), the accelerated amortization associated with the Mead-Phoenix transmission line, and certain payments related to the early termination of a tax safe harbor lease; and decommissioning costs associated with the closure of the 395 MW Cholla Unit 4 coal generation facility located near Joseph City, Arizona. Recovery in rates and allocation of costs recorded in the CRDMA may occur only after PacifiCorp has made a formal request and showing of reasonableness, and approval by the Commission. PacifiCorp's request shall be made by formal application, specifically by the inclusion in a future general rate case or other rate setting application.

Entries made to the CRDMA will include the unrecovered plant balance at the time Unit 4 is retired and the CWIP balance, other closure related costs and decommissioning costs as incurred or recognized for accounting purposes and as allocated to the California jurisdiction. Costs can be recorded to the CRDMA beginning December 27, 2019.

Interest will accrue monthly to the CRDMA by applying one-twelfth of the interest rate to the average of the beginning and ending balance in the CRDMA. The interest rate shall be the interest rate on the three-month commercial paper for the previous month, as reported in the Federal Reserve statistical release.

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Title

PRELIMINARY STATEMENT (Continued)  
PART C

23. COVID-19 Pandemic Protections Memorandum Account (CPPMA)

The purpose of the CPPMA is to record all costs incurred by the Company associated with the establishment of customer protections during the declared state of emergency in response to the COVID-19 Pandemic. All recorded costs will meet the following conditions:

- will be as ordered per Commission Resolutions M-4842 and M-4849; and
- will be incurred starting with the date of the Governor's emergency declaration - March 4, 2020.

Entries to the CPPMA shall be made at the end of each month. Incremental expenses associated with this resolution will be subject to Commission review.

Review of costs recorded to the CPPMA for possible collection in rates will be conducted in a General Rate Case, a Biennial or Triennial (as applicable) Cost Allocation Proceeding, Energy Cost Adjustment Clause Proceeding, or another proceeding.

Interest will accrue monthly to the CPPMA by applying one-twelfth of the interest rate to the average of the beginning and ending balance in the CPPMA. The interest rate shall be the interest rate on the three-month commercial paper for the previous month, as reported in the Federal Reserve statistical release.

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