

February 14, 2024

VIA ELECTRONIC FILING

 Public Utility Commission of Oregon
 Attn: Filing Center
 201 High Street SE, Suite 100
 Salem, OR 97301-3398

Re: Advice No. 24-001/Docket UE 433—PacifiCorp’s Request for General Rate Revision

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) submits for filing 17 copies of the following proposed tariff pages associated with the Company’s Tariff P.U.C. OR No. 36, applicable to electric service in the State of Oregon, together with the Executive Summary and supporting direct testimony and exhibits. The tariffs reflect an effective date of January 1, 2025. Electronic versions of the testimony, exhibits, supporting workpapers, and copies of the Company’s responses to the Standard Data Requests are being uploaded to Huddle.

<u>Sheet</u>	<u>Schedule</u>	<u>Title</u>
Seventh Revision of Sheet No. INDEX-2		Table of Contents – Schedules
Thirty-fourth Revision of Sheet No. INDEX-3		Table of Contents – Schedules
Fifth Revision of Sheet No. 4-1	Schedule 4	Residential Service Delivery Service
First Revision of Sheet No. 4-1	Schedule 4	Residential Service Delivery Service
Fifth Revision of Sheet No. 5-1	Schedule 5	Separately Metered Electric Vehicle Service for Residential Consumers Delivery Service
Original Sheet No. 5-2	Schedule 5	Separately Metered Electric Vehicle Service for Residential Consumers Delivery Service
CANCELED First Revision of Sheet No. 6-1	Schedule 6	Pilot for Residential Time-of-Use Service Delivery Service
CANCELED Original Sheet No. 6-2	Schedule 6	Pilot for Residential Time-of-Use Service Delivery Service
Second Revision of Sheet No. 7-1	Schedule 7	Low-Income Discount
Sixth Revision of Sheet No. 15-1	Schedule 15	Outdoor Area Lighting Service – Delivery Service
Sixth Revision of Sheet No. 23-1	Schedule 23	General Service – Small Nonresidential Delivery Service
Fourth Revision of Sheet No. 23-2	Schedule 23	General Service – Small Nonresidential Delivery Service
Second Revision of Sheet No. 23-3	Schedule 23	General Service – Small Nonresidential Delivery Service
Fifth Revision of Sheet No. 28-1	Schedule 28	General Service Large Nonresidential 31KW to 200 KW Delivery Service
Second Revision of Sheet No. 29-1	Schedule 29	General Service Time-Of-Use Large Nonresidential Delivery Service

<u>Sheet</u>	<u>Schedule</u>	<u>Title</u>
First Revision of Sheet No. 29-2	Schedule 29	General Service Time-Of-Use Large Nonresidential Delivery Service
Fifth Revision of Sheet No. 30-1	Schedule 30	General Service Large Nonresidential 201 KW to 999 KW Delivery Service
Fifth Revision of Sheet No. 41-1	Schedule 41	Agricultural Pumping Service Delivery Service
Fourth Revision of Sheet No. 41-2	Schedule 41	Agricultural Pumping Service Delivery Service
Third Revision of Sheet No. 41-3	Schedule 41	Agricultural Pumping Service Delivery Service
Fifth Revision of Sheet No. 47-1	Schedule 47	Large General Service Partial Requirements 1,000 KW and Over Delivery Service
Fourth Revision of Sheet No. 47-2	Schedule 47	Large General Service Partial Requirements 1,000 KW and Over Delivery Service
Sixth Revision of Sheet No. 48-1	Schedule 48	Large General Service 1,000 KW and Over Delivery Service
Sixth Revision of Sheet No. 48-2	Schedule 48	Large General Service 1,000 KW and Over Delivery Service
Sixth Revision of Sheet No. 51-1	Schedule 51	Street Lighting Service Company – Owned System Delivery Service
Sixth Revision of Sheet No. 53-1	Schedule 53	Street Lighting Service Consumer – Owned System Delivery Service
Sixth Revision of Sheet No. 54-1	Schedule 54	Recreational Field Lighting – Restricted Delivery Service
Fifth Revision of Sheet No. 76R-1	Schedule 76R	Large General Service – Partial Requirements Service Economic Replacement Power Rider Delivery Service
Original Sheet No. 80	Schedule 80	Insurance Cost Adjustment
Thirty-third Revision of Sheet No. 90-1	Schedule 90	Summary of Effective Rate Adjustments
Second Revision of Sheet No. 90-2	Schedule 90	Summary of Effective Rate Adjustments
Fourteenth Revision of Sheet No. 91-1	Schedule 91	Low Income Bill Payment Assistance Fund
First Revision of Sheet No. 92-1	Schedule 92	Low-Income Discount Cost Recovery Adjustment
Sixteenth Revision of Sheet No. 98	Schedule 98	Adjustment Associated with the Pacific Northwest Electric Power Planning and Conservation Act
Second Revision of Sheet No. 117-2	Schedule 117	Transportation Electrification Residential Charging Pilot
Second Revision of Sheet No. 118-2	Schedule 118	Transportation Electrification Nonresidential and Multifamily-Unit Dwelling Charging Pilot

<u>Sheet</u>	<u>Schedule</u>	<u>Title</u>
Original Sheet No. 193	Schedule 193	Catastrophic Fire Fund Adjustment
Ninth Revision of Sheet No. 200-1	Schedule 200	Base Supply Service
Ninth Revision of Sheet No. 200-2	Schedule 200	Base Supply Service
Ninth Revision of Sheet No. 200-3	Schedule 200	Base Supply Service
Nineteenth Revision of Sheet No. 201-1	Schedule 201	Net Power Cost-Based Supply Service
Nineteenth Revision of Sheet No. 201-2	Schedule 201	Net Power Cost-Based Supply Service
CANCELED Tenth Revision of Sheet No. 205-1	Schedule 205	TAM Adjustment for Other Revenues
CANCELED Tenth Revision of Sheet No. 205-2	Schedule 205	TAM Adjustment for Other Revenues
CANCELED Tenth Revision of Sheet No. 205-3	Schedule 205	TAM Adjustment for Other Revenues
Fifth Revision of Sheet No. 210-1	Schedule 210	Portfolio Time-Of-Use Supply Service Closed to New Service
Fifth Revision of Sheet No. 210-2	Schedule 210	Portfolio Time-Of-Use Supply Service Closed to New Service
Fourth Revision of Sheet No. 293-1	Schedule 293	New Large Load Direct Access Program Cost of Service Opt-Out
Fifth Revision of Sheet No. 299	Schedule 299	Rate Mitigation Adjustment
Fourth Revision of Sheet No. 300-3	Schedule 300	Charges as Defined by the Rules and Regulations
Fifth Revision of Sheet No. 723-1	Schedule 723	General Service – Small Nonresidential Direct Access Delivery Service
Fifth Revision of Sheet No. 728-1	Schedule 728	General Service Large Nonresidential 31 KW to 200 KW Direct Access Delivery Service
Fifth Revision of Sheet No. 730-1	Schedule 730	General Service Large Nonresidential 201 KW to 999 KW Direct Access Delivery Service
Fifth Revision of Sheet No. 741-1	Schedule 741	Agricultural Pumping Service Direct Access Delivery Service
Fifth Revision of Sheet No. 747-1	Schedule 747	Large General Service Partial Requirements 1,000 KW and Over Direct Access Delivery Service
Fourth Revision of Sheet No. 747-2	Schedule 747	Large General Service Partial Requirements 1,000 KW and Over Direct Access Delivery Service
Sixth Revision of Sheet No. 748-1	Schedule 748	Large General Service 1,000 KW and Over Direct Access Delivery Service
Sixth Revision of Sheet No. 748-2	Schedule 748	Large General Service 1,000 KW and Over Direct Access Delivery Service
Sixth Revision of Sheet No. 751-1	Schedule 751	Street Lighting Service Company-Owned System Direct Access Delivery Service

<u>Sheet</u>	<u>Schedule</u>	<u>Title</u>
Sixth Revision of Sheet No. 753-1	Schedule 753	Street Lighting Service Consumer-Owned System Direct Access Delivery Service
Sixth Revision of Sheet No. 754	Schedule 754	Recreational Field Lighting–Restricted Direct Access Delivery Service
Fifth Revision of Sheet No. 776R-1	Schedule 776R	Large General Service-Partial Requirements Service-Economic Replacement Service Rider Direct Access Delivery Service
Third Revision of Sheet No. 848-1	Schedule 848	Large General Service 1,000 KW and Over Direct Access Delivery Service – Distribution Only
Second Revision of Sheet No. 848-2	Schedule 848	Large General Service 1,000 KW and Over Direct Access Delivery Service – Distribution Only
Third Revision of Sheet No. R1-2	Rule 1	General Rules and Regulations Definitions
Third Revision of Sheet No. R13-1	Rule 13	General Rules and Regulations Line Extensions
Fourth Revision of Sheet No. R13-2	Rule 13	General Rules and Regulations Line Extensions
Third Revision of Sheet No. R13-3	Rule 13	General Rules and Regulations Line Extensions
Third Revision of Sheet No. R13-4	Rule 13	General Rules and Regulations Line Extensions
Third Revision of Sheet No. R13-5	Rule 13	General Rules and Regulations Line Extensions
Seventh Revision of Sheet No. R13-6	Rule 13	General Rules and Regulations Line Extensions
Fifth Revision of Sheet No. R13-7	Rule 13	General Rules and Regulations Line Extensions
Fifth Revision of Sheet No. R13-8	Rule 13	General Rules and Regulations Line Extensions
Fifth Revision of Sheet No. R13-9	Rule 13	General Rules and Regulations Line Extensions
Fourth Revision of Sheet No. R13-10	Rule 13	General Rules and Regulations Line Extensions
Fourth Revision of Sheet No. R13-11	Rule 13	General Rules and Regulations Line Extensions
Fifth Revision of Sheet No. R13-12	Rule 13	General Rules and Regulations Line Extensions
Third Revision of Sheet No. R13-13	Rule 13	General Rules and Regulations Line Extensions
Original Sheet No. R13-14	Rule 13	General Rules and Regulations Line Extensions
Original Sheet No. R13-15	Rule 13	General Rules and Regulations Line Extensions

Confidential material in support of the filing has been provided to parties who have signed General Protective Order No. 23-132 for this docket.

Please address all communications related to this filing to:

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Please direct informal correspondence and questions regarding this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 433**

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
Request for a General Rate Revision.

**PACIFICORP'S
EXECUTIVE SUMMARY**

I. INTRODUCTION

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) respectfully requests the Public Utility Commission of Oregon revise the Company's schedules of rates and charges for Oregon electric services under ORS 757.205 and 757.220.

PacifiCorp is requesting an overall increase in rates of approximately \$322.3 million or 17.9 percent.¹ This overall request is comprised of (1) a base rate increase of \$157.7 million; (2) an Insurance Cost Adjustment of \$66.0 million, which reflects both deferred and on-going insurance premiums; (3) \$77.7 million to fund the Company's proposed Catastrophic Fire Fund; (4) the estimated true-up of \$21.2 million for the Wildfire Mitigation Plan (WMP) automatic adjustment clause (AAC); and (5) the rebalancing of the Rate Mitigation Adjustment for a reduction of \$0.4 million.

This general rate revision is necessary because the Company is currently forecasted to earn a normalized return on equity (ROE) in Oregon of 6.5 percent under current rates, which is less than the Company's currently authorized ROE of 9.5 percent. The Company's proposed rates would produce revenues that are necessary to sustain a stable, reliable, and

¹ When combined with a proposed \$18.3 million decrease in net power costs in docket UE 434, the overall change results in a net base rate increase of \$304.1 million. *See, In the Matter of PacifiCorp. dba Pacific Power, 2025 Transition Adjustment Mechanism*, Docket No. UE 434, filed Feb. 14, 2024.

low-cost power supply, while also preserving the Company's ability to attract capital for future investments.

PacifiCorp is an electric company and public utility in Oregon within the meaning of ORS 757.005, and is subject to Commission jurisdiction regarding PacifiCorp's prices and terms of electric service for Oregon retail customers. The Company provides electric service to approximately 627,000 retail customers in Oregon, and approximately 2.0 million total retail customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp's principal place of business is Portland, Oregon. This executive summary and the attached Exhibit A are filed in compliance with OAR 860-022-0019.

The Company requests that communications regarding this filing be addressed to:

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PacifiCorp
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Please direct informal correspondence and questions regarding this filing to Cathie Allen at (503) 813-5934.

II. CASE SUMMARY

The Company is requesting an overall increase in rates of approximately \$322.3 million for rates effective January 1, 2025, and if approved, would result in an \$1,234.2 million non-net power cost revenue requirement. This revenue requirement is based on a historical base period of 12 months that ended June 2023, and normalizing and pro forma adjustments to calculate a calendar year 2025 future test period (with the exception of capital additions that are based on calendar year-end 2024 balances). The new rates assume a full nine-month statutory suspension period, in addition to the 30-day effective date now contained in tariffs. The following briefly summarizes the Company's Weighted Average Cost of Capital (WACC), Cost Drivers, Rate Design, and Modification to Existing Regulatory Mechanisms.

A. Weighted Average Cost of Capital

The Company is requesting an overall WACC of 7.74 percent. This is based on an increased ROE to 10.30 percent from the currently authorized 9.5 percent, a cost of preferred stock of 6.75 percent, and a cost of long-term debt of 5.18 percent. The Company also proposes a capital structure that includes 50.00 percent common stock, 49.99 percent long-term debt, and 0.01 percent preferred stock.

This proposed WACC is necessary to maintain the financial integrity of the Company, while ensuring its ability to provide safe, efficient, and reliable service to its Oregon customers with minimal rate impacts.

B. Cost Drivers

This rate request includes several cost drivers, including new capital additions and increased operating and maintenance expenses.

i. Capital Additions

The Company continues to make new investments in its system that are required to provide safe, adequate, and reliable service to customers and to comply with regulatory mandates. Incremental additions included in this case include investments in all facets of the Company's system—including transmission, generation, distribution, and customer support assets—to bolster reliability and improve power delivery and customer services.

These investments include over 600 miles of new high voltage transmission lines and related network upgrades and supporting transmission and distribution infrastructure; 240 megawatts of new and repowered wind generation facilities; the conversion of 1.2 gigawatts of existing coal generation to operate on natural gas; a substantial modernization of the Company's customer service system to improve the delivery and support of various customer services; and material wildfire mitigation investments.

ii. Operating and Maintenance Costs

PacifiCorp is requesting recovery of increased operating and maintenance costs for several categories of costs. These include material increases to insurance premiums that have been caused by increased wildfire liability risks in the region generally, and for the Company specifically. PacifiCorp is requesting approval of two mechanisms, the Insurance Cost

Adjustment and Catastrophic Fire Fund, that are outside of base rates to address the escalating costs of wildfire liability. This increase also includes costs resulting from rebuild and restoration of PacifiCorp infrastructure caused by wildfires from 2020.

Further, unrelated to wildfire mitigation measures, the Company is incurring additional spending with respect to vegetation management as a result of increasing costs. The Company's rate revision includes these increased levels of vegetation management costs to base rates.

C. Rate Design

The Company is proposing a rate spread that is consistent with the cost-of-service study and Rate Mitigation Adjustment, where no customer rate class will see an increase greater than 22.4 percent. PacifiCorp proposes an average 17.9 percent increase to current rates.

PacifiCorp also proposes to increase the single-family basic charge from \$11 to \$16 per month, the multi-family basic charge from \$8 to \$9. For large non-residential customers, the Company proposes a Customer-Funded Substation Credit for certain large customers that did not receive a line extension allowance greater than the cost of metering and a Capacity Reservation Charge and Excess Demand Charge that would be applicable to large customers who reserve more power than they require or use more than the level for which they contracted. PacifiCorp also proposes improvements and consolidation of its time-of-use options.

D. Proposed Regulatory Mechanisms

The Company requests approval of two proposals that will help position the Company to respond to financial risk posed by the increasing frequency and severity of wildfires

impacting PacifiCorp's service areas.

The first is an Insurance Cost Adjustment that enable the Company to annually procure insurance for third-party liability using the most economical combination of commercial insurance and insurance through a new Insurance Mechanism. Specific to this general rate case, the Company is seeking approval to recover liability insurance costs through a surcharge.

The second mechanism is a Catastrophic Fire Fund that will facilitate a multi-state risk pool for potential catastrophic events where third-party liabilities are in excess of the Company's insurance coverage.

These proposals complement the Company's ongoing investments in wildfire mitigation throughout its service territory, and are required by the rapid changes in the insurance market and the wildfire liability outlook for utilities throughout the West.

III. TESTIMONY SUMMARY

The Company's general rate revision is supported by the following testimony and exhibits of 19 PacifiCorp witnesses or third-party expert consultants:

- **Cindy A. Crane**, Chief Executive Officer, provides an overview of PacifiCorp, its Oregon service area, and the strategies the Company is pursuing to provide Oregon customers with low-cost, reliable, and non-emitting generation to power their homes, businesses, and communities. She also explains the escalating wildfire risk that the Company has faced since its last rate case, the steps the Company is taking to address those risks, and introduces the Company witnesses that provide direct testimony in support of PacifiCorp's rate request.
- **Matthew D. McVee**, Vice President, Regulatory Policy and Operations, describes

PacifiCorp's request in this proceeding and summarize the regulatory policies of the Company. He also explains the steps the Company is taking to incorporate equity in its Oregon operations and planning.

- **Nikki L. Kobliha**, Chief Financial Officer, addresses the Company's overall cost of capital recommendation for the Company, including a capital structure to maximize value and minimize risk and the current cost of debt.
- **Ann E. Bulkley**, Principal at The Brattle Group, provides a comparison of PacifiCorp's business and financial risk compared to peer utilities, recommends a cost of equity, and provides supporting analyses.
- **Robert S. Mudge**, Principal at The Brattle Group, discusses the increased wildfire risk and financial exposure faced by utilities in the Western U.S. and explains how PacifiCorp's proposed remedies are reasonable to manage this growing risk.
- **Joelle R. Steward**, Senior Vice President, Regulation and Customer/Community Solutions, supports an Insurance Cost Adjustment that will support a new insurance mechanism in development and a Catastrophic Fire Fund.
- **Mariya V. Coleman**, Vice President of Corporate Insurance and Claims for Berkshire Hathaway Energy Company, supports the Company's updated costs associated with insurance premiums.
- **Rick T. Link**, Senior Vice President, Resource Planning, Procurement and Optimization, provides the economic analyses of the Gateway South and Gateway West Segment D.1 transmission projects.
- **Thomas R. Burns**, Vice President of Resource Planning and Acquisitions for PacifiCorp, provides the economic analyses of the conversion of Jim Bridger Units 1

and 2 to natural gas, the Rock Creek I wind facility, and the Rock River I repowering project.

- **Richard A. Vail**, Vice President of Transmission Services, describes PacifiCorp's transmission system and the benefits it provides to Oregon customers, and discusses important transmission and distribution system upgrades that will be completed to serve customers, including the Gateway South and Gateway West Segment D.1 transmission projects.
- **Timothy J. Hemstreet**, Vice President of Renewable Energy Development, supports the Company's Rock River I repowering project and its investment in the Fall Creek Hatchery.
- **Jeffrey M. Wagner**, Renewable Development Manager, provides support of the prudence of the Rock Creek I wind project.
- **Brad D. Richards**, Vice President of Thermal Generation, supports the Company's investment in the gas conversion of Jim Bridger Units 1 and 2 and the flue gas desulfurization pond project at the Jim Bridger Plant.
- **Allen Berreth**, Vice President of Transmission and Distribution Operations, supports the wildfire-related transmission and distribution investments and vegetation management expenses in the rate case. He also supports the inclusion of the restoration costs related to the September 2020 wildfires. Finally, he supports the Company's investment in the Juniper Ridge Bend Service Center.
- **William J. Comeau**, Vice President of Customer Experience and Innovation, supports the upgrade to the Company's legacy Customer Service System.

- **Kenneth Lee Elder, Jr.**, Load Forecasting Manager, supports the Company’s load forecast for the test period.
- **Sherona L. Cheung**, Revenue Requirement Manager, summarizes the overall test year revenue requirement, pro forma adjustments, and the rate base calculation methodology.
- **Anna DeMers**, Senior Customer Regulatory Specialist, supports several new proposed policies in response to very large customers, including a Capacity Reservation Charge and an Excess Demand Charge, in addition to extending the period during which very large customers are eligible for Line Extension Refunds.
- **Robert M. Meredith**, Director of Pricing and Tariff Policy, provides PacifiCorp’s cost of service study and rate design, and discusses how the proposed tariff changes recover the proposed revenue requirement to achieve fair, just, and reasonable prices for customers.

IV. CONCLUSION

The Company respectfully requests the Commission approve PacifiCorp’s proposed general rate revisions and tariff amendments.

Respectfully submitted February 14, 2024.



Carla Scarsella
Deputy General Counsel
Ajay Kumar
Assistant General Counsel

PacifiCorp d/b/a Pacific Power

EXHIBIT A

Exhibit A
Summary of Requested Electric General Rate Increase
Oregon Allocated
Filed February 14, 2024

(A)	Total net revenues collected under proposed rates:	\$2,120,636,823
(B)	<u>Base</u> ¹	
	Revenue change requested:	
	Total:	\$208,106,240
	Net of credits from federal agencies:	\$208,106,240
	<u>Net</u> ²	
	Revenue change requested:	
	Total:	\$322,337,401
	Net of credits from federal agencies:	\$322,337,401
(C)	<u>Base</u> ¹	
	Percentage change in revenues requested:	
	Total %:	12.4%
	Net of credits from federal agencies:	12.4%
	<u>Net</u> ²	
	Percentage change in revenues requested:	
	Total %:	17.9%
	Net of credits from federal agencies:	17.9%
(D)	Test period:	Calendar year 2025
(E)	Requested return on capital:	7.74%
	Requested return on equity:	10.3%
(F)	Rate base proposed in filing:	\$5,300,883,073
(G)	Results of operation:	
	Utility operating income, before proposed change:	\$308,794,389
	Utility operating income, after proposed change:	\$410,296,672

(H)	Effect of rate change on each customer class:	<u>Base</u>	<u>Net Change</u> ²
		<u>Change</u> ¹	
	• Residential:	12.5%	21.6%
	• Small General Service (Schedule 23):	15.8%	22.4%
	• General Service 31-200 kW (Schedule 28):	9.2%	10.4%
	• General Service 201-999 kW (Schedule 30):	11.5%	11.3%
	• Large General Service >= 1,000 kW (Schedule 48):	11.3%	14.1%
	• Agriculture Pumping Service (Schedule 41):	21.9%	22.4%
	• Street lighting:	11.4%	4.5%
	• Total	12.4%	17.9%
(I)	Information Required by Utility Staff General Rate Case Data Request Form A:	Provided under separate cover	

¹ Base change includes \$50.4 million for the proposed base Insurance Cost Adjustment as discussed in the application and testimony.

² Net Change reflects the net impact to customers on January 1, 2025, of the proposed price change including \$15.6 million for the deferred Insurance Cost Adjustment, \$77.7 million for the Catastrophic Fire Fund, \$21.2 million for the true-up of the Wildfire Mitigation Plan automatic adjustment clause and a reduction of \$0.4 million for the rebalancing of the Rate Mitigation Adjustment as discussed in the application and testimony.

ACRONYM LIST

Witness	Acronym	Definition
Crane	CEO	Chief Executive Officer
Crane	U.S.	Western United States
Crane	2023 Rate Case	last general rate case
Comeau	Company	PacifiCorp d/b/a Pacific Power
Comeau	CSS	Company's legacy Customer Service System
Comeau	BHE	Berkshire Hathaway Energy
Comeau	IT	information technology
Wagner	MW	megawatt
Wagner	Rock Creek I	Rock Creek I Wind Project
Wagner	IRP	integrated resource plan
Wagner	2020AS RFP	2020 All-Source Request for Proposal
Wagner	BTA	build-transfer agreement
Wagner	WTG	wind turbine generator
Wagner	CPCN	certificate of public convenience and necessity
Wagner	Wyoming Commission	Wyoming Public Service Commission
Wagner	PTC	production tax credit
Wagner	O&M	operations and maintenance
Wagner	IRA	Inflation Reduction Act
Bulkley	Brattle	The Brattle Group
Bulkley	Commission	Public Utility Commission of Oregon
Bulkley	BHE	Berkshire Hathaway Energy Company
Bulkley	ROE	Return on Equity
Bulkley	DCF	Discounted Cash Flow
Bulkley	CAPM	Capital Asset Pricing Model
Bulkley	ECAPM	Empirical Capital Asset Pricing Model
Bulkley	BYRP or Risk Premium	Bond Yield Risk Premium
Bulkley	2020 GRC	2020 general rate case
Bulkley	PNW	Pinnacle West Capital Corporation
Bulkley	ICC	Illinois Commerce Commission
Bulkley	Ameren IL	Ameren Illinois Co.
Bulkley	ComEd	Commonwealth Edison Co.
Bulkley	RRA	Regulatory Research Associates
Bulkley	YOY	year-over-year
Bulkley	CPI	Consumer Price Index
Bulkley	FOMC	Federal Open Market Committee
Bulkley	SEP	Summary of Economic Projections
Bulkley	S&P	Standard and Poor's
Bulkley	EPS	earnings per share
Bulkley	GDP	gross domestic product
Bulkley	EIA	Energy Information Administration
Bulkley	U.S.	United States
Bulkley	BofA	BofA Securities
Bulkley	PG&E	Pacific Gas and Electric Company
Bulkley	SoCalEd	Southern California Edison
Bulkley	FEMA	Federal Emergency Management Agency
Bulkley	PCAM	Power Cost Adjustment Mechanism
Bulkley	Fitch	Fitch Ratings

Hemstreet	PTC	production tax credit
Hemstreet	FERC	Federal Energy Regulatory Commission
Hemstreet	KHSA	Klamath Hydroelectric Settlement Agreement
Hemstreet	CDFW	California Department of Fish and Wildlife
Hemstreet	NMFS	National Marine Fisheries Service
Hemstreet	MW	megawatt
Hemstreet	WTG	wind turbine generator
Hemstreet	U.S.	United States
Hemstreet	PSOA	Purchase and Sale Option Agreement
Hemstreet	GE	General Electric International, Inc.
Hemstreet	Black & Veatch	Black & Veatch, Inc.
Hemstreet	KRRRC	Klamath River Renewal Corporation
Burns	IRP	integrated resource plan
Burns	MW	megawatt
Burns	PVRR(d)	present-value revenue requirement differential
Burns	IRA	Inflation Reduction Act
Burns	RECs	renewable energy certificates
Burns	CO ₂	carbon dioxide
Burns	LT	Long-term platform of the PLEXOS modeling system
Burns	MT	Medium-term platform of the PLEXOS modeling system
Burns	ST	Short-term platform of the PLEXOS modeling system
Burns	2020AS RFP	2020 All-Source Request for Proposals
Burns	MM	medium natural gas prices paired with medium CO ₂ prices
Burns	LN	low natural gas prices without a CO ₂ price
Burns	MN	medium natural gas prices without a CO ₂ price
Burns	HH	high natural gas prices paired with high CO ₂ prices
Burns	SCGHG	medium gas prices and the social cost of greenhouse gases
Burns	NPC	net power cost
Burns	OFPC	official forward price curve
Burns	OTR	Ozone Transport Rule
Burns	NO _x	nitrogen oxide
Burns	BTA	build-transfer agreement
Burns	PTC	production tax credit
Burns	NERC	North American Electric Reliability Corporation
Burns	EPA	Environmental Protection Agency
Burns	SCR	selective catalytic reduction
Burns	PVRR	present-value revenue requirement
Burns	WTG	wind turbine generator
Link	IRP	integrated resource plan
Link	RFP	request for proposal
Link	Commission	Public Utility Commission of Oregon
Link	Utah Commission	Utah Public Service Commission
Link	kV	kilovolt
Link	Transmission Projects	Gateway South and Gateway West Segment D.1 transmission projects
Link	2020AS RFP	2020 All-Source Request for Proposal
Link	PTC	production tax credits
Link	RECs	renewable-energy credits
Link	megawatts	MW
Link	PTP	point-to-point
Link	FERC	Federal Energy Regulatory Commission
Link	CO ₂	carbon dioxide
Link	price-policy scenarios	five different scenarios that pair varying natural gas price assumptions with varying carbon dioxide policy assumptions
Link	MM	Medium natural gas prices paired with medium CO ₂ prices
Link	MN	Medium natural gas prices without a CO ₂ price
Link	HH	High natural gas prices paired with high CO ₂ prices
Link	LN	Low natural gas prices without a CO ₂ price
Link	SCGHG	The Social Cost of Greenhouse Gas
Link	PVRR(d)	present-value revenue requirement differential
Link	IRA	Inflation Reduction Act
Link	OTR	Ozone Transport Rule

Link	WECC	Western Electricity Coordinating Council
Link	WARA	Western Assessment of Resource Adequacy Report
Link	NWPP-NW	Northwest Power Pool Northwest
Link	NWPP-NE	Northwest Power Pool Northeast
Link	NWPP-C	Northwest Power Pool Central
Link	NERC	North American Electric Reliability Corporation
Link	LTRA	Long-Term Resource Adequacy
Link	BESS	battery energy storage systems
Link	PPA	power-purchase agreements
Link	BTA	build-transfer agreements
Link	BSA	battery storage agreements
Link	NPC	net-power costs
Link	OFPC	official forward price curve
Link	EPA	Environmental Protection Agency
Link	LT	Long-term platform of the PLEXOS modeling system
Link	MT	Medium-term platform of the PLEXOS modeling system
Link	ST	Short-term platform of the PLEXOS modeling system
Link	DSM	demand-side management
Link	Aurora	AURORAXMP4
Elder	kWh	kilowatt-hour
Elder	Rate Case	general rate case
Elder	MWh	megawatt-hour
Elder	Test Period	12-month period ending December 31, 2025
Elder	CY 2025	2025 Rate Case
Elder	LED	light-emitting diode
Elder	RBM	regional business manager
Berreth	WMP	Mitigation Plan
Berreth	AAC	Automatic Adjustment Clause
Berreth	Commission	Public Utilities Commission of Oregon
Berreth	SB	Senate Bill
Berreth	O&M	operation and maintenance
Berreth	WMVM	Wildfire Mitigation and Vegetation Management
Richards	FGD	flue gas desulfurization
Richards	O&M	operating and maintenance

Vail	OATT	Open Access Transmission Tariff
Vail	GWS	Gateway South
Vail	kV	kilovolt
Vail	Commission	Public Utility Commission of Oregon
Vail	BAA	balancing authority area
Vail	CAISO	California Independent System Operation
Vail	WEIM	Western Energy Imbalance Market
Vail	PACE	PacifiCorp East
Vail	PACW	PacifiCorp West
Vail	BPA	Bonneville Power Administration
Vail	FERC	Federal Energy Regulatory Commission
Vail	BES	Bulk Electric System
Vail	NERC	North American Electric Reliability Corporation
Vail	TPL Standards	transmission system planning performance requirements
Vail	WECC	Western Electricity Coordinating Council
Vail	ATRR	annual transmission revenue requirement
Vail	Transmission Projects	Gateway South and Gateway West Transmission Projects
Vail	MW	megawatt
Vail	ROW	right-of-way
Vail	MVA	megavolt amperes
Vail	RAS	remedial action scheme
Vail	EMS	Energy Management System
Vail	FVC	Fast Volt Controller
Vail	WFS	Wasatch Front South
Cheung	NPC	net power costs
Cheung	GRC	general rate case
Cheung	TAM	Transition Adjustment Mechanism
Cheung	Base Period	historical period of the 12 months ended June 2023
Cheung	Test Period	12-month period ending December 31, 2025
Cheung	ROE	return on equity
Cheung	WMP	Wildfire Mitigation Plan
Cheung	AAC	Automatic Adjustment Clause
Cheung	2023 Rate Case	the Company's 2023 GRC, docket UE 399
Cheung	2020 Protocol	2020 PacifiCorp Inter-Jurisdictional Allocation Protocol
Cheung	ECD	embedded cost differential
Cheung	O&M	operations and maintenance
Cheung	ADV 1529 Agreement	agreement reached in docket ADV 1529
Cheung	Comission	Public Utility Commission of Oregon
Cheung	Report	results of operations report
Cheung	FERC	Federal Energy Regulatory Commission
Cheung	REC	Renewable Energy Certificate
Cheung	RPS	Renewable Portfolio Standard
Cheung	NEO	Named Executive Officers
Cheung	WEBA	Wage and Employee Benefits adjustments
Cheung	Non-T&D	non-transmission and distribution
Cheung	SG	system generation
Cheung	KRRC	Klamath River Renewal Corporation
Cheung	WRAP	Western Resource Adequacy Program
Cheung	COSR	Committee of State Regulators
Cheung	EDIT	Excess Deferred Income Tax
Cheung	TCJA	Tax Cut and Jobs Act
Cheung	SB	Senate Bill
Cheung	PTC	Production Tax Credit
Cheung	ADIT	Accumulated Deferred Income Tax
Cheung	MWh	megawatt-hour
Cheung	AFUDC	Allowance for Funds Used During Construction
Cheung	OCAT	Oregon Corporate Activity Tax
Cheung	Metro BIT	Metro Business Income Tax
Cheung	DSP	Distribution System Plan
Cheung	PHFU	Plant Held for Future Use
Cheung	MBTR	modified blended treasury rate
Cheung	KHSA	Klamath Hydroelectric Settlement Agreement

Coleman	BHE	Berkshire Hathaway Energy Company
Coleman	Commission	Public Utility Commission of Oregon
Coleman	U.S.	United States
Meredith	RMA	Rate Mitigation Adjustment
Meredith	TAM	Transition Adjustment Mechanism
Meredith	2021 Rate Case	Docket UE 374
Meredith	kW	kilowatt
Meredith	FERC	Federal Energy Regulatory Commission
Meredith	Marginal Cost Study	PacifiCorp's State of Oregon December 2024 Marginal Cost Study
Meredith	MWh	megawatt-hours
Meredith	2023 Rate Case	Docket UE 399
Meredith	kWh	kilowatt-hour
Meredith	MidC	Mid-Columbia
Meredith	O&M	operation and maintenance
Meredith	Non-NPC	Non-net Power Costs
Meredith	IOU	investor owned utility
Meredith	WEIM	Western Energy Imbalance Market
McVee	Commission	Public Utility Commission of Oregon
McVee	ROE	return on equity
McVee	ROR	rate of return
McVee	CSS	Customer Service System
McVee	2020 Protocol	2020 PacifiCorp Inter-Jurisdictional Allocation Protocol
McVee	kilovolt	kV
McVee	WMP	Wildfire Mitigation Plan
McVee	PCAM	Power Cost Adjustment Mechanism
McVee	CBIAG	Community Benefits and Input Advisory Group
McVee	IRP	Integrated Resource Plan
McVee	DSP	Distribution System Planning
McVee	CEP	Clean Energy Plan
McVee	TE	Transportation Electrification
McVee	CBI	customer benefit indicators
McVee	LID	Low-Income Discount program
McVee	SMI	state medium income
McVee	DEI	Diversity, Equity & Inclusion
Steward	Commission	Public Utility Commission of Oregon
Steward	GRC	General Rate Case
Steward	2020 Protocol	2020 PacifiCorp Inter-Jurisdictional Allocation Protocol
Steward	WMP	Wildfire Mitigation Plan
Steward	PSPS	Public Safety Power Shutoff
Steward	AEGIS	Associated Electric & Gas Insurance Services Limited
Steward	S&P	Standard & Poor's
Steward	Moody's	Moody's Investors Service
Steward	MSP	Multi-State Process
Steward	IOU	investor-owned utility
Steward	SO	System Overhead
Steward	EFR	Elevated Fire Risk Reclosers
Kobliha	S&P	Standard & Poor's
Kobliha	BHE	Berkshire Hathaway Energy
Kobliha	Test Period	calendar year 2025 test period
Kobliha	CFO Pre-WC/Debt	pre-working capital divided by debt
Kobliha	FFO	funds from operations
Kobliha	SACP	stand-alone credit profile
Kobliha	WUTC	Washington Utilities and Transportation Commission
Kobliha	Alaska Commission	Regulatory Commission of Alaska
Kobliha	FERC	Federal Energy Regulatory Commission
Kobliha	Louisiana Commission	Louisiana Public Service Commission
Kobliha	ML&P	Anchorage Municipal Light and Power
Kobliha	Missouri River	Missouri River Energy
Kobliha	U.S.	United States

Mudge	Commission	Public Utility Commission of Oregon
Mudge	Brattle	The Brattle Group
Mudge	PG&E	Pacific Gas and Electric Company
Mudge	SCE	Southern California Edison
Mudge	CPUC	California Public Utilities Commission
Mudge	AB 1054	California Assembly Bill 1054
Mudge	O&M	operating and maintenance expense
Mudge	PG&E, SCE, and SDG&E	California IOUs
Mudge	ROE	return on equity
DeMers	OCA	Wyoming Office of Consumer Advocate
DeMers	Commission	Public Utility Commission of Oregon
DeMers	Refunds	Line Extension Refunds
DeMers	Advances	Line Extension Advances
DeMers	kW	kilowatts
DeMers	FERC	Federal Energy Regulatory Commission

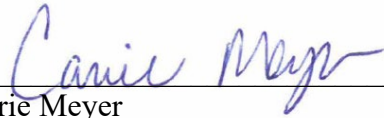
CERTIFICATE OF SERVICE

I certify that a true and correct copy of **PacifiCorp's Request for General Rate Revision** was served on the parties listed below via electronic delivery in compliance with OAR 860-001-0180.

Service List UE 433

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Dated this 14th day of February, 2024.


Carrie Meyer
Adviser, Regulatory Operations

CERTIFICATE OF SERVICE

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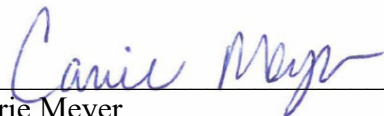
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Dated this 14th day of February, 2024.



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