

March 17, 2023

***VIA ELECTRONIC FILING***

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**RE: Advice No. 23-01—PacifiCorp’s 2023 General Rate Case**

PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) submits for filing and approval by the Washington Utilities and Transportation Commission (Commission) proposed new tariff sheets applicable to electric service supplied by the Company in the state of Washington to become effective on March 1, 2024. The proposed new tariff sheets are contained in Exhibit No. RMM-11 accompanying this filing. In accordance with WAC 480-07-510(2), the proposed new tariff sheets are also provided in legislative format.

In accordance with Washington Engrossed Substitute Senate Bill 5295, codified at RCW 80.28.425, PacifiCorp is proposing a two-year rate plan. The filing is based on a historical test period of the 12 months ended June 30, 2022, adjusted for known and measurable changes. Consistent with Commission precedent, the Company’s net power costs are based on the pro forma period of the calendar year 2024, which corresponds to the rate effective period.

By the enclosed tariff sheets, PacifiCorp requests an increase in revenues of approximately \$26.8 million from Washington operations for the first rate year, effective March 1, 2024. For the second rate year, the requested increase is approximately \$27.9 million. Under the Company’s proposal, the average residential customer using 1,200 kilowatt-hours per month would see a \$12.11 increase in the first year, followed by a \$9.34 increase in the second year.

A summary of the relief requested, the reasons PacifiCorp is seeking this relief, and an overview of the topics covered by each of PacifiCorp’s witnesses is provided in the pre-filed direct testimony of Matthew D. McVee, Exhibit No. MDM-1T, which is included in this filing. In compliance with WAC 480-07-510(1), the Company has enclosed and original and five paper copies of PacifiCorp’s pre-filed direct testimony and exhibits supporting this general rate case filing. Electronic copies of all files are provided in accordance with WAC 480-07-140(5).

PacifiCorp has marked certain pages of its filing “DESIGNATED INFORMATION IS CONFIDENTIAL PER WAC 480-07-160.” These documents are protected from any further disclosure by the Commission or the Office of the Attorney General, including their outside experts, under RCW 80.04.095 and WAC 480-07-160. PacifiCorp’s filing includes a motion requesting that the Commission issue a protective order to govern disclosure of confidential information for use in this case.

PacifiCorp requests that the documents contained in the envelopes identified with the cover page marked “DESIGNATED INFORMATION IS CONFIDENTIAL PER WAC 480-07-160,” as well as the files marked “CONFIDENTIAL” or “CONF” on the versions of the USB drives containing confidential materials, be treated as confidential under the provisions of WAC 480-07-160 because they contain sensitive commercial information. In accordance with WAC 480-07-160(5), PacifiCorp has enclosed redacted versions of the documents containing confidential information along with the non-confidential documents in its filing, and has placed unredacted versions of the documents containing confidential information in separate envelopes with corresponding “DESIGNATED INFORMATION IS CONFIDENTIAL PER WAC 480-07-160” labels on the envelopes. Each page of the unredacted version containing confidential information is printed on yellow paper.

As required by WAC 480-07-510(4), the Company is providing the supporting workpapers in electronic format on the enclosed USB drives. Certain workpapers and models are being provided as confidential under WAC 480-07-160(3).

As required by WAC 480-07-510(7), the Company has also provided uniform resource locators (URLs) to the following additional documents in Attachment D: the Company’s recent FERC Form 1; the Company’s Form 10Ks and Form 10Qs; the Company’s most recent bond issuance prospectus; and the 2021 Affiliated Interest Report. There are no annual or quarterly reports to shareholders.

Attachment A to this letter is the Summary Document prepared in compliance with WAC 480-07-510(5). In compliance with WAC 480-07-510(5)(b), PacifiCorp is serving copies of the Summary Document on the persons listed on the attached Certificate of Service. The Company’s pre-filed testimony, exhibits and work papers are available from the Company on request. Attachment B to this letter is a listing of the tariff sheets proposed to be revised. Attachment C is the Printed Index for all electronic files included with this filing. Attachment E is a Supplement to the Company’s 2021 Affiliated Interest Report.

In compliance with WAC 480-100-194, PacifiCorp agrees to suspend the proposed tariff filing and thus is not required to publish notice immediately before or coincident with the date of this letter and filing. PacifiCorp agrees to waive the suspension hearing and requests that the Commission issue an order suspending these proposed changes for investigation, and that a hearing to take testimony from the public be scheduled at the prehearing conference. Accordingly, the Company will provide notice to the public under WAC 480-100-197(2). In compliance with WAC 480-100-193(1), PacifiCorp will also post the proposed changes to its tariff sheets for public inspection and review on its website.

PacifiCorp’s proposed tariff schedules are dated May 1, 2023. Given the ten-month suspension period, PacifiCorp respectfully requests a rate effective date of March 1, 2024.

Washington Utilities and Transportation Commission

March 17, 2023

Page 3

Please direct all service and correspondence related to this filing to:

Carla Scarsella  
Ajay Kumar  
Zachary Rogala  
Joseph Dallas  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
Email:  
[carla.scarsella@pacificorp.com](mailto:carla.scarsella@pacificorp.com)  
[ajay.kumar@pacificorp.com](mailto:ajay.kumar@pacificorp.com)  
[zachary.rogala@pacificorp.com](mailto:zachary.rogala@pacificorp.com)  
[joseph.dallas@pacificorp.com](mailto:joseph.dallas@pacificorp.com)

Jocelyn Pease  
Katherine McDowell  
McDowell, Rackner & Gibson PC  
419 S.W. Eleventh Avenue, Suite 400  
Portland, OR 97205  
Email:  
[jocelyn@mrg-law.com](mailto:jocelyn@mrg-law.com)  
[katherine@mrg-law.com](mailto:katherine@mrg-law.com)

Washington Dockets  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
Email: [washingtondockets@pacificorp.com](mailto:washingtondockets@pacificorp.com)

In addition, the Company respectfully requests that all data requests regarding this matter be addressed to:

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

Please direct any questions to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

          /s/            
Matthew McVee  
Vice President, Regulatory Policy & Operations  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
(503) 813-5585  
[matthew.mcvee@pacificorp.com](mailto:matthew.mcvee@pacificorp.com)

Enclosures

Attachment A: Summary Document  
Attachment B: List of Proposed Tariff Sheets  
Attachment C: Index of Electronic Files  
Attachment D: Supplemental Documentation  
Attachment E: Supplement to PacifiCorp's 2021 Affiliated Interest Report

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served **PacifiCorp dba Pacific Power & Light Company's General Rate Case Summary** upon all parties of record in this proceeding, by electronic transmission to the email address(es) of each party or party representative listed in the commission's master service list for this docket.

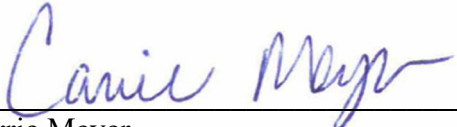
**Service List  
UE-23\_\_\_\_\_**

<b>Public Counsel</b>	
Lisa Gafken Office of the Attorney General 800 Fifth Avenue STE 2000 Seattle, WA 98104-3188 <a href="mailto:Lisaw4@atg.wa.gov">Lisaw4@atg.wa.gov</a>	Nina Suetake Assistant Attorney General Attorney General's Office 800 5th Avenue STE 2000 Seattle, WA 98104-3188 <a href="mailto:Nina.suetake@atg.wa.gov">Nina.suetake@atg.wa.gov</a>
Ann Paisner 800 Fifth Avenue STE 2000 Seattle, WA 98104-3188 <a href="mailto:Ann.Paisner@atg.wa.gov">Ann.Paisner@atg.wa.gov</a>	Brice Hartman 800 Fifth Ave STE 2000 Seattle, WA 98104 <a href="mailto:brice.hartman@atg.wa.gov">brice.hartman@atg.wa.gov</a>
Chanda Mak Legal Assistant Office of the Attorney General 800 Fifth Avenue STE 2000 Seattle, WA 98104-3188 <a href="mailto:chandam@atg.wa.gov">chandam@atg.wa.gov</a>	
<b>Assistant Attorney General</b>	
Jeff Roberson Assistant Attorney General WUTC PO Box 47250 Olympia, WA 98504-0128 <a href="mailto:jeff.roberson@utc.wa.gov">jeff.roberson@utc.wa.gov</a>	Nash Callaghan Assistant Attorney General WUTC PO Box 47250 Olympia, WA 98504-0128 <a href="mailto:Nash.callaghan@utc.wa.gov">Nash.callaghan@utc.wa.gov</a>
<b>NW Energy Coalition</b>	
Lauren McCloy Policy Director NW Energy Coalition 811 1st Ave # 305 Seattle, WA 98104 <a href="mailto:lauren@nwenergy.org">lauren@nwenergy.org</a>	Amy Wheelless Senior Policy Analyst NW Energy Coalition 811 1st Avenue STE 304 Seattle, WA 98104 <a href="mailto:amy@nwenergy.org">amy@nwenergy.org</a>

<b>Packaging Corporation of America</b>	
Tyler Pepple Davison Van Cleve, PC 1750 SW Harbor Way, Suite 450 Portland, OR 97201 <a href="mailto:tcp@dvclaw.com">tcp@dvclaw.com</a>	Bradley Mullins Davison Van Cleve, PC 1750 SW Harbor Way STE 450 Portland, OR 97201 <a href="mailto:brmullins@mwanalytics.com">brmullins@mwanalytics.com</a>
Patrick Loupin PCA Corporate Purchasing Manager - Energy Packaging Corporation of America 101 S. Capitol Blvd STE 800 Boise, ID 83702 <a href="mailto:PatrickLoupin@packagingcorp.com">PatrickLoupin@packagingcorp.com</a>	Sommer Moser Davison Van Cleve, PC 1750 SW Harbor Way, Suite 450 Portland, OR 97201 <a href="mailto:sjm@dvclaw.com">sjm@dvclaw.com</a>
Jesse Gorsuch Davison Van Cleve, PC 1750 SW Harbor Way, Suite 450 Portland, OR 97201 <a href="mailto:jog@dvclaw.com">jog@dvclaw.com</a>	Lance Kaufman 2101 Fourth Avenue 1000 Seattle, WA 98121 <a href="mailto:lance@aegisinsight.com">lance@aegisinsight.com</a>
<b>The Energy Project</b>	
The Energy Project 3406 Redwood Avenue Bellingham, WA 98225 <a href="mailto:info@theenergyproject.com">info@theenergyproject.com</a>	Yochanan Zakai Shute, Mihaly & Weinberger, LLP 396 Hayes Street San Francisco, California 94102 <a href="mailto:yzakai@smwlaw.com">yzakai@smwlaw.com</a>
Sara L. Breckenridge Shute, Mihaly & Weinberger, LLP 396 Hayes Street San Francisco, California 94102 <a href="mailto:breckenridge@smwlaw.com">breckenridge@smwlaw.com</a>	
<b>AWEC</b>	
Brent Coleman Alliance of Western Energy Consumers 1750 SW Harbor Way STE 450 Portland, OR 97201 <a href="mailto:blc@dvclaw.com">blc@dvclaw.com</a>	Tyler Pepple Davison Van Cleve, PC 1750 SW Harbor Way STE 450 Portland, OR 97201 <a href="mailto:tcp@dvclaw.com">tcp@dvclaw.com</a>
<b>Sierra Club</b>	
Rose Monahan 2101 Webster St, Suite 1300 Oakland, CA 94612 <a href="mailto:rose.monahan@sierraclub.org">rose.monahan@sierraclub.org</a>	Leah Bahramipour 2101 Webster St, Suite 1300 Oakland, CA 94612 <a href="mailto:leah.bahramipour@sierraclub.org">leah.bahramipour@sierraclub.org</a>

<b>Pacific Power &amp; Light Company</b>	
Matthew McVee Pacific Power & Light Company 825 NE Multnomah Street STE 2000 Portland, OR 97232 <a href="mailto:matthew.mcvee@pacificorp.com">matthew.mcvee@pacificorp.com</a> <a href="mailto:washingtondockets@pacificorp.com">washingtondockets@pacificorp.com</a>	Adam Lowney McDowell Rackner & Gibson PC 419 SW 11th Avenue STE 400 Portland, OR 97205 <a href="mailto:adam@mcd-law.com">adam@mcd-law.com</a>
Ajay Kumar Pacific Power & Light Company 825 NE Multnomah St. STE 2000 Portland, OR 97232 <a href="mailto:Ajay.Kumar@pacificorp.com">Ajay.Kumar@pacificorp.com</a>	Katherine McDowell McDowell Rackner & Gibson PC 419 SW 11th Avenue STE 400 Portland, OR 97205 <a href="mailto:katherine@mcd-law.com">katherine@mcd-law.com</a>
Carla Scarsella Pacific Power & Light Company 825 NE Multnomah St. STE 2000 Portland, OR 97232 <a href="mailto:carla.scarsella@pacificorp.com">carla.scarsella@pacificorp.com</a>	Ariel Son Pacific Power & Light Company 825 NE Multnomah Street STE 2000 Portland, OR 972132 <a href="mailto:ariel.son@pacificorp.com">ariel.son@pacificorp.com</a>
<b>Wal-Mart</b>	
Vicki M. Baldwin Parsons Behle & Latimer 201 South Main Street STE 1800 Salt Lake City, UT 84111 <a href="mailto:vbaldwin@parsonsbehle.com">vbaldwin@parsonsbehle.com</a>	Alex Kronauer 2608 Southeast J Street Bentonville, AR 72712-0550 <a href="mailto:Alex.Kronauer@walmart.com">Alex.Kronauer@walmart.com</a>
<b>The Alliance for Solar Choice</b>	
Kathleen D. Kapla Keyes, Fox & Wiedman, LLP 8205 31st AVE NE Seattle, WA 98115 <a href="mailto:kkapla@kfwlaw.com">kkapla@kfwlaw.com</a>	Joseph Wiedman Keyes, Fox & Wiedman, LLP 436 14th Street STE 1305 Oakland, CA 94612 <a href="mailto:jwiedman@kfwlaw.com">jwiedman@kfwlaw.com</a>

Dated at Portland, Oregon this 17<sup>th</sup> day of March, 2023.

  
 \_\_\_\_\_  
 Carrie Meyer  
 Adviser, Regulatory Operations

**PACIFICORP dba PACIFIC POWER & LIGHT COMPANY**

**Attachment A**

**Summary of Requested Electric General Rate Increase**

Washington Jurisdiction

Filed March 17, 2023

---

- 1) **The date and amount of the latest prior general rate increase authorized by the Commission, and the revenue realized from that authorized increase in the test period, based on the company's test period units of revenue.**

Date:	May 1, 2022
Amount:	\$392,807,000
Amount Realized in the test period:	\$405,024,000

- 2) **Total revenues at present rates and at requested rates.**

Present Rates	\$405,024,000
Requested First Year Rates	\$431,787,000
Requested Second Year Rates	\$459,735,000

- 3) **Requested revenue change in percentage, in total, and by major customer class.**

Residential	16.1%
Commercial	9.3%
Industrial	15.2%
Irrigation	16.1%
Lighting	16.7%
<u>Total</u>	<u>13.5%</u>

- 4) **Requested revenue change in dollars, in total, and by major customer class.**

Residential	\$28,712,000
Commercial	\$13,545,000
Industrial	\$10,008,000
Irrigation	\$2,350,000
Lighting	\$96,000
<u>Total</u>	<u>\$54,711,000</u>

- 5) **The representative effect of the request in dollars for the average monthly use per customer, by customer class or other similar meaningful representation, including, but not limited to, the effect of the proposed rate change in dollars per month on residential customers by usage categories.**

Residential	\$20.77
Commercial	\$59.00
Industrial	\$1,426.66
Irrigation	\$38.09
Lighting	\$17.38

- 6) **Most current customer count by major customer class.**

Residential	115,211
Commercial	19,133
Industrial	585
Irrigation	5,141
Lighting	459
<b>Total</b>	<b>140,528</b>

- 7) **Current authorized overall rate of return and authorized rate of return on common equity.**

Overall rate of return	7.17%
Rate of return on common equity	9.50%

- 8) **Actual rate of return and actual return on equity for the test period.**

Overall rate of return	5.77%
Rate of return on common equity	6.72%

- 9) **Requested overall rate of return and requested rate of return on common equity, and the method or methods used to calculate rate of return on common equity.**

Overall rate of return	7.60%
Rate of return on common equity	10.3%

Method(s) of Calculation: The Company relied on several methods to calculate a reasonable range of return on equity: discounted cash flow (DCF), Yield-Plus-Growth, CAPM, Risk Premium, and Comparable Earnings. The quantitative model results produce a cost of equity range of 9.23 percent to 10.22 percent. Based upon further review of allowed returns, economic data and Company-specific considerations, the Company recommends a 10.2 percent return on common equity.



**10) Requested capital structure.**

Long-Term Debt	48.72%
Preferred Stock	0.01%
Common Equity Stock	51.27%

**11) Requested total net operating income.**

Net operating income:	\$83,632,236
-----------------------	--------------

**12) Requested total rate base and method of calculation, or equivalent.**

Rate base:	\$1,100,424,347
------------	-----------------

Method(s) of calculation: Pro forma electric-plant-in-service balances and associated accumulated deferred income tax balances are reflected using the average-of-monthly-averages method. Other elements of rate base are also reflected using the average-of-monthly-averages method.

**13) Requested revenue effect of attrition allowance, if any requested.**

No attrition allowance is requested.

The proposed tariff sheets to be revised in Pacific Power and Light Company's currently effective Tariff WN U-76 are designated as follows:

Third Revision of Sheet No. INDEX.2		Tariff Index
Fifth Revision of Sheet No. INDEX.3		Tariff Index
Third Revision of Sheet No. 15.1	Schedule 15	Outdoor Area Lighting Service
CANCEL Original Sheet No. 15.2	Schedule 15	Outdoor Area Lighting Service
Third Revision of Sheet No. 16.1	Schedule 16	Residential Service
Fourth Revision of Sheet No. 17.1	Schedule 17	Low Income Bill Assistance Program – Residential Service Optional for Qualifying Customers
CANCEL Original Sheet No. 18.1	Schedule 18	Three Phase Residential Service Rider
CANCEL Original Sheet No. 18.2	Schedule 18	Three Phase Residential Service Rider
Fourth Revision of Sheet No. 19.1	Schedule 19	Residential Service – Time of Use Pilot
First Revision of Sheet No. 24.1	Schedule 24	Small General Service
Third Revision of Sheet No. 24.2	Schedule 24	Small General Service
First Revision of Sheet No. 24.3	Schedule 24	Small General Service
Third Revision of Sheet No. 29.1	Schedule 29	Non-Residential Time of Use Pilot
First Revision of Sheet No. 36.1	Schedule 36	Large General Service – Less Than 1,000 kW
Third Revision of Sheet No. 36.2	Schedule 36	Large General Service – Less Than 1,000 kW
Fourth Revision of Sheet No. 40.1	Schedule 40	Agricultural Pumping Service
First Revision of Sheet No. 40.2	Schedule 40	Agricultural Pumping Service
First Revision of Sheet No. 40.3	Schedule 40	Agricultural Pumping Service

Third Revision of Sheet No. 48T.1	Schedule 48T	Large General Service – Metered Time of Use 1,000 kW and Over
First Revision of Sheet No. 48T.2	Schedule 48T	Large General Service – Metered Time of Use 1,000 kW and Over
First Revision of Sheet No. 48T.3	Schedule 48T	Large General Service – Metered Time of Use 1,000 kW and Over
Third Revision of Sheet No. 51.1	Schedule 51	Street Lighting Service – Company-Owned System
Third Revision of Sheet No. 53.1	Schedule 53	Street Lighting Service – Customer-Owned System
CANCEL Original Sheet No. 53.2	Schedule 53	Street Lighting Service – Customer-Owned System
Third Revision of Sheet No. 54.1	Schedule 54	Recreational Field Lighting – Restricted
CANCEL Original Sheet No. 54.2	Schedule 54	Recreational Field Lighting – Restricted
Third Revision of Sheet No. 80.1	Schedule 80	Summary of Effective Rate Adjustments
Third Revision of Sheet No. 91.1	Schedule 91	Surcharge to Fund Low Income Bill Assistance Program
Second Revision of Sheet No. 92.1	Schedule 92	Deferral Adjustments
Sixth Revision of Sheet No. 93.1	Schedule 93	Decoupling Revenue Adjustment
Third Revision of Sheet No. 97.1	Schedule 97	Power Cost Adjustment Mechanism
First Revision of Sheet No. 99.1	Schedule 99	Production Tax Credit Tracker Adjustment
First Revision of Sheet No. 135.1	Schedule 135	Net Metering Service
First Revision of Sheet No. 135.2	Schedule 134	Net Metering Service
Original Sheet No. 135.3	Schedule 135	Net Metering Service
Original Sheet No. 138.1	Schedule 138	Net Billing Service

Original Sheet No. 138.2	Schedule 138	Net Billing Service
Original Sheet No. 138.3	Schedule 138	Net Billing Service
Original Sheet No. 138.4	Schedule 138	Net Billing Service
Third Revision of Sheet No. 191.1	Schedule 191	System Benefits Charge Adjustment
Second Revision of Sheet No. 197.1	Schedule 197	Federal Tax Act Adjustment
First Revision of Sheet No. R1.2	Rule 1	General Rules and Regulations – Definitions
First Revision of Sheet No. R1.3	Rule 1	General Rules and Regulations - Definitions

**PACIFICORP dba PACIFIC POWER & LIGHT COMPANY**

**Attachment C**

**File Index**

Washington Jurisdiction

Filed March 17, 2023

---

**USB.1 NON-CONFIDENTIAL**

NEW-PAC-Cvr-Ltr-3-17-23.pdf  
NEW-PAC-Attach-A-3-17-23.pdf  
NEW-PAC-Attach-B-3-17-23.pdf  
NEW-PAC-Attach-C-3-17-23.pdf  
NEW-PAC-Attach-D-3-17-23.pdf  
NEW-PAC-Attach-E-3-17-23.pdf  
NEW-PAC-Motion-3-17-23.pdf

01. Matthew D. McVee

NEW-PAC-Exh-MDM-1T-3-17-23.pdf

02. Christina M. Medina

NEW-PAC-Exh-CMM-1T-3-17-23.pdf

03. Ann E. Bulkley

Non-Confidential Workpapers AEB  
NEW-PAC-Exh-AEB-1T-3-17-23.pdf  
NEW-PAC-Exh-AEB-2-3-17-23.pdf  
NEW-PAC-Exh-AEB-3-3-17-23.pdf  
NEW-PAC-Exh-AEB-4to14-3-17-23.xlsx  
NEW-PAC-Exh-AEB-4-3-17-23.pdf  
NEW-PAC-Exh-AEB-5-3-17-23.pdf  
NEW-PAC-Exh-AEB-6-3-17-23.pdf  
NEW-PAC-Exh-AEB-7-3-17-23.pdf  
NEW-PAC-Exh-AEB-8-3-17-23.pdf  
NEW-PAC-Exh-AEB-9-3-17-23.pdf  
NEW-PAC-Exh-AEB-10-3-17-23.pdf  
NEW-PAC-Exh-AEB-11-3-17-23.pdf  
NEW-PAC-Exh-AEB-12-3-17-23.pdf  
NEW-PAC-Exh-AEB-13-3-17-23.pdf  
NEW-PAC-Exh-AEB-14-3-17-23.pdf

04. Nikki L. Kobliha

NEW-PAC-Exh-NLK-1T-3-17-23.pdf  
NEW-PAC-Exh-NLK-2-3-17-23.pdf  
NEW-PAC-Exh-NLK-2-3-17-23.xlsx  
NEW-PAC-Exh-NLK-3-3-17-23.pdf  
NEW-PAC-Exh-NLK-4-3-17-23.pdf  
NEW-PAC-Exh-NLK-4-3-17-23.xlsx

NEW-PAC-Exh-NLK-5-3-17-23.pdf  
NEW-PAC-Exh-NLK-5-3-17-23.xlsx  
NEW-PAC-Exh-NLK-6-3-17-23.pdf  
NEW-PAC-Exh-NLK-6-3-17-23.xlsx

05. Ramon J. Mitchell

Non-Confidential Workpapers RJM  
NEW-PAC-Exh-RJM-1CT-3-17-23(R).pdf  
NEW-PAC-Exh-RJM-2-3-17-23.pdf  
NEW-PAC-Exh-RJM-2-3-17-23.xlsx

06. Jack Painter

NEW-PAC-Exh-JP-1T-3-17-23.pdf

07. Rick T. Link

Non-Confidential Workpapers RTL  
NEW-PAC-Exh-RTL-1T-3-17-23.pdf

08. Thomas R. Burns

Non-Confidential Workpapers TRB  
NEW-PAC-Exh-TRB-1CT-3-17-23(R).pdf

09. Richard A. Vail

NEW-PAC-Exh-RAV-1T-3-17-23.pdf

10. Timothy J. Hemstreet

NEW-PAC-Exh-TJM-1CT-3-17-23(R).pdf  
NEW-PAC-Exh-TJM-2-3-17-23.pdf  
NEW-PAC-Exh-TJM-3-3-17-23.pdf  
NEW-PAC-Exh-TJM-4C-3-17-23(R).pdf  
NEW-PAC-Exh-TJM-5C-3-17-23(R).pdf

11. Ryan D. McGraw

NEW-PAC-Exh-RDM-1CT-3-17-23(R).pdf

12. Brad D. Richards

NEW-PAC-Exh-BDR-1T-3-17-23.pdf

13. Allen L. Berreth

NEW-PAC-Exh-ALB-1T-3-17-23.pdf  
NEW-PAC-Exh-ALB-2-3-17-23.pdf

14. William J. Comeau

NEW-PAC-Exh-WJC-1T-3-17-23.pdf

15. Jayson Branch

NEW-PAC-Exh-JB-1CT-3-17-23(R).pdf  
NEW-PAC-Exh-JB-2-3-17-23.pdf

NEW-PAC-Exh-JB-3-3-17-23.pdf  
NEW-PAC-Exh-JB-4-3-17-23.pdf  
NEW-PAC-Exh-JB-5-3-17-23.pdf  
NEW-PAC-Exh-JB-6-3-17-23.pdf

16. Sherona L. Cheung

Non-Confidential Workpapers SLC  
NEW-PAC-Exh-SLC-1T-2-3-17-23.pdf  
NEW-PAC-Exh-SLC-2-2-3-17-23.pdf  
NEW-PAC-Exh-SLC-3-2-3-17-23.pdf  
NEW-PAC-Exh-SLC-4-2-3-17-23.pdf  
NEW-PAC-Exh-SLC-5-2-3-17-23.pdf  
NEW-PAC-Exh-SLC-6C-2-3-17-23(R).pdf  
NEW-PAC-Exh-SLC-7C-2-3-17-23(R).pdf

17. Robert M. Meredith

Non-Confidential Workpapers RMM  
NEW-PAC-Exh-RMM-1T-3-17-23.pdf  
NEW-PAC-Exh-RMM-2-3-17-23.pdf  
NEW-PAC-Exh-RMM-3-3-17-23.pdf  
NEW-PAC-Exh-RMM-4-3-17-23.pdf  
NEW-PAC-Exh-RMM-5-3-17-23.pdf  
NEW-PAC-Exh-RMM-5-3-17-23.xlsx  
NEW-PAC-Exh-RMM-6-3-17-23.pdf  
NEW-PAC-Exh-RMM-7-3-17-23.pdf  
NEW-PAC-Exh-RMM-7-3-17-23.xlsx  
NEW-PAC-Exh-RMM-8-3-17-23.pdf  
NEW-PAC-Exh-RMM-8-3-17-23.xlsx  
NEW-PAC-Exh-RMM-9-3-17-23.pdf  
NEW-PAC-Exh-RMM-9-3-17-23.xlsx  
NEW-PAC-Exh-RMM-10-3-17-23.pdf  
NEW-PAC-Exh-RMM-11-3-17-23.pdf

Tariffs

Tariffs Clean  
Tariffs Legislative

Workpaper Index

Bulkley Workpaper Index (WA 2023 GRC).docx  
Burns Workpaper Index (WA 2023 GRC).docx  
Cheung Workpaper Index (WA 2023 GRC).docx  
Kobliha Workpaper Index (WA 2023 GRC).docx  
Link Workpaper Index (WA 2023 GRC).docx  
Meredith Workpaper Index (WA 2023 GRC).docx  
Mitchell Workpaper Index (WA 2023 GRC).xlsx

**USB.2 CONFIDENTIAL**

01. Matthew D. McVee  
No Confidential
02. Christina M. Medina  
No Confidential
03. Ann E. Bulkley  
Confidential Workpapers AEB
04. Nikki L. Koblaha  
Confidential Workpapers NLK
05. Ramon J. Mitchell  
Confidential Workpapers RJM  
NEW-PAC-Exh-RJM-1CT-3-17-23(C).pdf
06. Jack Painter  
No Confidential
07. Rick T. Link  
Confidential Workpapers RTL
08. Thomas R. Burns  
Confidential Workpapers TRB  
NEW-PAC-Exh-TRB-1CT-3-17-23 (C).pdf
09. Richard A. Vail  
No Confidential
10. Timothy J. Hemstreet  
NEW-PAC-Exh-TJH-1CT-3-17-23 (C).pdf  
NEW-PAC-Exh-TJH-4C-3-17-23 (C).pdf  
NEW-PAC-Exh-TJH-5C-3-17-23 (C).pdf
11. Ryan D. McGraw  
NEW-PAC-Exh-RDM-1CT-3-17-23 (C).pdf
12. Brad D. Richards  
No Confidential
13. Allen L. Berreth  
No Confidential
14. William J. Comeau  
No Confidential



15. Jayson Branch  
NEW-PAC-Exh-JB-1CT-3-17-23 (C).pdf
16. Sherona L. Cheung  
Confidential Workpapers SLC  
NEW-PAC-Exh-SLC-6C-3-17-23 (C).pdf  
NEW-PAC-Exh-SLC-7C-3-17-23 (C).pdf
17. Robert M. Meredith  
Confidential Workpapers RMM

**PACIFICORP dba PACIFIC POWER & LIGHT COMPANY**

**Attachment D**

**Additional Documents**

Washington Jurisdiction

Filed March 17, 2023

---

Consistent with WAC 480-07-510(7), PacifiCorp provides the Uniform Resource Locators (URLs) to the following additional documentation:

1. PacifiCorp's most recent Form 10-K filed on February 24, 2023:  
<https://www.sec.gov/ix?doc=/Archives/edgar/data/75594/000108131623000005/bhe-20221231.htm>
2. PacifiCorp's most recent Form 10-Q filed on November 4, 2022:  
<https://www.sec.gov/ix?doc=/Archives/edgar/data/75594/000108131622000046/bhe-20220930.htm>
3. On July 9, 2021, PacifiCorp completed the sale of \$1 billion in aggregate principal amount of 2.90% First Mortgage Bonds due June 15, 2052. The Prospectus Supplement is available at:  
[https://www.sec.gov/Archives/edgar/data/75594/000110465921090303/tm2120912-2\\_424b5.htm](https://www.sec.gov/Archives/edgar/data/75594/000110465921090303/tm2120912-2_424b5.htm)
4. On December 1, 2022, PacifiCorp completed the sale of \$1.1 billion in aggregate principal amount of 5.350% First Mortgage Bonds due December 1, 2053. The Prospectus Supplement is available at:  
[https://www.sec.gov/Archives/edgar/data/75594/000110465922123233/tm2231063-2\\_424b2.htm](https://www.sec.gov/Archives/edgar/data/75594/000110465922123233/tm2231063-2_424b2.htm)
5. PacifiCorp's most recent Federal Energy Regulatory Commission (FERC) Form 1 filed on April 13, 2022:  
[https://www.brkenergy.com/assets/upload/regulatory-filing/20211231\\_pc\\_annual\\_form1.pdf](https://www.brkenergy.com/assets/upload/regulatory-filing/20211231_pc_annual_form1.pdf)
6. PacifiCorp does not provide annual or quarterly reports to stockholders.
7. Consistent with WAC 480-07-510(3)(g), PacifiCorp's 2021 affiliate interest report was filed on May 27, 2022, in Docket No. UE-220393.  
<https://www.utc.wa.gov/casedocket/2022/220393/docsets>

PacifiCorp provides additional information on affiliate transactions not included in its 2021 report in Attachment E.

**PacifiCorp  
Attachment E  
Supplement to the 2021 PacifiCorp Affiliated Interest Report  
Filed March 17, 2023**

Affiliated Entity	Services Provided/Received	Treatment in Washington GRC
BNSF Railway Company	Coal transportation services, from all Wyoming Powder River Basin coal mines to the PacifiCorp Dave Johnston power plant, located in Glenrock, Wyoming.	The Dave Johnston plant is not reflected in Washington rates.
	Permitting for modification of existing overhead railroad track crossing on Burlington Northern property. BNSF tracking # 21W-11466.	This permit is for the Klamath hydro facility, and therefore included in Washington rates.
	Permitting for modification of existing overhead railroad track crossing on Burlington Northern property. BNSF tracking # 21W-11468.	This permit is for the Klamath hydro facility, and therefore included in Washington rates.
	BNSF Electric Supply Line License for a crossing in Millersburg, OR. Permit #21W-11525	This permit is for a transmission/distribution substation in Millersburg, Oregon, and therefore included in Washington rates.
Marmon Utility LLC	Contract for design services, installation materials, job support and installation of aerial cable systems for wildfire mitigation.	A significant portion of these investments will occur in distribution projects outside of Washington, and the costs of which would not be allocated to Washington customers. Only the investments used for Washington will be included in Washington rates.

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba  
PACIFIC POWER & LIGHT COMPANY,

Respondent.

Docket UE-23\_\_\_\_\_

PACIFICORP’S MOTION FOR  
STANDARD PROTECTIVE ORDER

**I. RELIEF REQUESTED**

*I* In conjunction with the request for a general rate increase filed by PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or the Company) on March 17, 2023, PacifiCorp moves for the entry of the standard protective order by the Washington Utilities and Transportation Commission (Commission) under WAC 480-07-420(1).

PacifiCorp’s representatives in this proceeding are:

Matthew McVee  
Vice President, Regulatory Policy  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
Phone: (503) 813-5585  
Email: [matthew.mcvee@pacificorp.com](mailto:matthew.mcvee@pacificorp.com)

Jocelyn Pease  
Katherine McDowell  
McDowell Rackner & Gibson, PC  
419 SW 11<sup>th</sup> Avenue, Suite 400  
Portland, OR 97205  
Phone: (503) 290-3620  
Email: [jocelyn@mrg-law.com](mailto:jocelyn@mrg-law.com)  
[katherine@mrg-law.com](mailto:katherine@mrg-law.com)

Carla Scarsella  
Ajay Kumar  
Zachary Rogala  
Joseph Dallas  
Legal Counsel for PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
Phone: (503) 813-6338  
Email: [carla.scarsella@pacificorp.com](mailto:carla.scarsella@pacificorp.com)  
[ajay.kumar@pacificorp.com](mailto:ajay.kumar@pacificorp.com)  
[zachary.rogala@pacificorp.com](mailto:zachary.rogala@pacificorp.com)  
[joseph.dallas@pacificorp.com](mailto:joseph.dallas@pacificorp.com)

PacifiCorp Washington Dockets  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
Email: [WashingtonDockets@PacifiCorp.com](mailto:WashingtonDockets@PacifiCorp.com)

## II. BACKGROUND AND AUTHORITIES IN SUPPORT

2 On March 17, 2023, PacifiCorp filed a general rate case. PacifiCorp marked information contained on certain pages of its supporting testimony and exhibits as confidential. Under WAC 480-07-510(3), the Company provided workpapers in support of its filing, portions of which are also marked confidential. Pending entry of the Commission’s standard protective order, the Company designated this information as confidential under the Commission’s general rule on confidentiality, WAC 480-07-160, and under RCW 80.04.095.

3 The information that PacifiCorp marked “confidential” includes commercially sensitive information regarding the Company’s pricing strategy, fuel costs, contracts, reports, and other terms that could be misappropriated by parties for their commercial benefit and to the Company’s and its customers’ detriment. In discovery, parties to this proceeding may request other types of information that is commercially valuable to the Company or involves confidential information of customers, employees, business counter-parties, or other third-parties. PacifiCorp minimized the amount of information it designated as confidential to promote the ability of the public to review the filing and participate in this case.

4 The Commission has authority to grant PacifiCorp’s motion under WAC 480-07-420(1), which allows the Commission to enter “a standard form of protective order to promote the free exchange of information and development of the factual record in a proceeding when the commission finds that parties reasonably anticipate that discovery or evidentiary filings will re-quire information designated as confidential as defined in WAC 480-07-160 to be disclosed to other parties in the adjudication.” There is ample

Commission precedent for the entry of protective orders in general rate cases, including the protective order the Commission entered in both PacifiCorp's 2015 general rate case<sup>1</sup> and 2020 general rate case.<sup>2</sup>

5           The material PacifiCorp seeks to protect in this case is the type of information that is intended to be eligible for confidential protections under RCW 80.04.095 and WAC 480-07-160. Public release of any of the confidential information could compromise the Company's ability to compete fairly and impose a business risk to the Company. The result would be increased costs for PacifiCorp and, ultimately, its customers.

### III. CONCLUSION

6           For the reasons set forth above, PacifiCorp respectfully requests that the Commission enter its standard form of protective order in this case.

---

<sup>1</sup> *Washington Utils. & Trans. Comm. v. PacifiCorp d/b/a Pac. Power & Light Co.*, Docket No. UE-152253, Order 02 (Dec. 8, 2015).

<sup>2</sup> *Washington Utils. & Trans. Comm. v. PacifiCorp d/b/a Pac. Power & Light Co.*, Docket No. UE-191024, Order 02 (Jan. 13, 2020).

Respectfully submitted this 17<sup>th</sup> day of March, 2023.

/s/

---

Carla Scarsella, OSB# 193139

Ajay Kumar

Zachary Rogala

Joseph Dallas

Legal Counsel for PacifiCorp

825 NE Multnomah Street, Suite 2000

Portland, OR 97232

Phone: (503) 813-6338

Email: [carla.scarsella@pacificorp.com](mailto:carla.scarsella@pacificorp.com)

[ajay.kumar@pacificorp.com](mailto:ajay.kumar@pacificorp.com)

[zachary.rogala@pacificorp.com](mailto:zachary.rogala@pacificorp.com)

[joseph.dallas@pacificorp.com](mailto:joseph.dallas@pacificorp.com)

Jocelyn Pease

Katherine McDowell

McDowell Rackner & Gibson, PC

419 SW 11<sup>th</sup> Avenue, Suite 400

Portland, OR 97205

Phone: (503) 290-3620

Email: [jocelyn@mrg-law.com](mailto:jocelyn@mrg-law.com)

[katherine@mrg-law.com](mailto:katherine@mrg-law.com)

Attorneys for PacifiCorp