



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: PacifiCorp (U 901 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Pooja Kishore

Phone #: (503) 813-7314

E-mail: californiadockets@pacificorp.com

E-mail Disposition Notice to: californiadockets@pacificorp.com; rct

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 651-E

Tier Designation: Tier 1

Subject of AL: PacifiCorp (U 901-E) Advice Letter No. 651-E-A Supplement —Information-Only
PacifiCorp's 2020 Risk Spending Accountability Report

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D. 19-04-020

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets: n/a

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹: See Advice Filing

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Pooja Kishore
Title: Regulatory Manager
Utility Name: PacifiCorp
Address: 825 NE Multnomah Street, Suite 2000
City: Portland State: Oregon
Telephone (xxx) xxx-xxxx: (503) 813-7314
Facsimile (xxx) xxx-xxxx:
Email: californiadockets@pacificorp.com

Name:
Title:
Utility Name:
Address:
City: State: Oregon
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

July 9, 2021

VIA ELECTRONIC FILING

California Public Utilities Commission
Energy Division
Tariff Unit, 4th Floor
505 Van Ness Avenue
San Francisco, CA 94102
Email: edtariffunit@cpuc.ca.gov

**Re: PacifiCorp (U 901-E) Advice Letter No. 651-E-A Supplement —Information-Only
PacifiCorp’s 2020 Risk Spending Accountability Report**

PURPOSE

In accordance with Public Utilities Code (PUC) Section 591,¹ PacifiCorp, d/b/a Pacific Power (PacifiCorp), submits this supplement to its information-only Advice Letter (AL) 651-E its 2020 Risk Spending Accountability Report (Report). The updated Report is provided as Exhibit A.

BACKGROUND & DISCUSSION

On June 30, 2021, PacifiCorp submitted Advice Letter 651-E, PacifiCorp’s 2020 Risk Spending Accountability Report in accordance with the California Public Utilities Commission (CPUC) issued Decision (D.) 19-04-020. The company submits this supplemental filing to correct an error in calculation that was identified following the June 30, 2021 submission.

This updated Risk Spend Accountability Report reflects a correcting entry related to the overstatement of FERC 593 in 2018 and 2019 which was made in September 2020.² The result of the adjustment to FERC 593 is an increase of \$3.1m to 2020 actuals for Distribution expense. The correction, as reflected in the updated RSAR resulted in a distribution expense percentage difference of 8% instead of 29.4% as reported in the June 30, 2021 filing.

PROTESTS

PacifiCorp respectfully requests that the Commission not extend the protest period for this filing and that the protest date of July 20, 2021 remain in place. Anyone wishing to protest this

¹ California Public Utilities Code § 591(a) states, “The commission shall require an electrical or gas corporation to annually notify the commission, as part of an ongoing proceeding or in a report otherwise required to be submitted to the commission, of each time since that notification was last provided that capital or expense revenue authorized by the commission for maintenance, safety, or reliability was redirected by the electrical or gas corporation to other purposes.”

² The artificial reduction of FERC 593 in 2020 = 3.1m (represents 2019 over-statement of 1.3m and 2018 over-statement of 1.8 m).

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information-only AL may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than July 20, 2021. Protests should be mailed to:

Energy Division
Tariff Unit, 4th Floor
505 Van Ness Avenue
San Francisco, CA 94102
Facsimile: 415-703-2200
Email: edtariffunit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest should also be sent via U.S. mail and electronically, if possible, to PacifiCorp at the address show below on the same date it is mailed or delivered to the Commission.

Pooja Kishore
Regulatory Affairs Manager
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (503) 813-7314
Email: californiadockets@pacificorp.com

Matthew McVee
Chief Regulatory Counsel
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (503) 813-5585
Email: matthew.mcvee@pacificorp.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

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

By email (**preferred**): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

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NOTICE

In accordance with General Order 96-B, Section 4, a copy of this Advice Letter will be served electronically or via U.S. mail to parties shown on the GO 96-B service list, a copy of which is attached. This advice letter will also be served on the service list for A.09-11-015 and A.18-04-002. A request for change of address in the GO 96-B service list should be directed by electronic mail to californiadockets@pacificorp.com. Advice letter filings may also be accessed electronically at: www.pacificpower.net/regulation.

Please direct any informal questions to Pooja Kishore, Regulatory Affairs Manager, at (503) 813-7314.

Sincerely,

A handwritten signature in cursive script that reads "Shelley McCoy".

Shelley McCoy
Director, Regulation

Enclosures

Exhibit A
PacifiCorp's 2020 Risk Spending Accountability Report



PacifiCorp

**2020 Interim Risk Spending Accountability Report¹
California Allocated**

CAPITAL		2020	2020	Difference	Percentage Change
Function	Authorized (A) ²	Actual (B)	(B-A)	(B-A)/A	
Transmission	112,777,063	106,004,736	(6,772,327)	-6.01%	
Tier 2 Compliance					
Hydraulic and Obsolete Relay Replacements					
Transmission Fault Locating Relays					
Installation of RTACs/Communications Devices					
Distribution	282,349,459	282,694,520	345,061	0.12%	
Tier 2 Compliance					
Hydraulic and Obsolete Relay Replacements					
Installation of RTACs/Communications Devices					
TOTAL	395,126,521	388,699,255	(6,427,266)	-1.63%	
EXPENSE		2020	2020	Difference	Percentage Change
Function	Authorized (A) ³	Actual (B)	(B-A)	(B-A)/A	
Transmission	1,147,180	1,066,574	(80,606)	-7.03%	
LiDAR Inspections					
Enhanced Inspections					
Increased Facility Inspection Cycles					
Pre-Fire Season Vegetation Patrols					
Emergency Operations Planning					
Increased Vegetation Clearances					
Distribution	14,477,082	13,319,377	(1,157,705)	-8.00%	
Enhanced Inspections					
Increased Inspection Cycles					
Pre-Fire Season Vegetation Patrols					
Emergency Operations Planning					
Increased Vegetation Clearances					
TOTAL	15,624,262	14,385,950	(1,238,311)	-7.93%	

Notes:

¹Per previous conversations with Michael Zelazo at the CPUC Energy Division, risk spending includes any FERC account which includes spending on safety, reliability and/or maintenance activities. The company has made good faith effort to include only accounts which meet this description. The amounts shown are inclusive of these activities that also map back to risk reducing programs as indicated, but also include other operating activities.

²Authorized capital was determined by starting with the capital in-service gross plant balances for each function authorized in the company's last General Rate Case, A.18-004-002, plus any major transmission or distribution capital addition projects approved for recovery in California rates in the company's approved PTAM Major Capital Additions filings subsequent to that rate case to determine 2020 authorized in rates amounts.

³Authorized costs reflect the costs included in the company's last General Rate Case, A.18-004-002, for the FERC accounts identified in Note #1 above. The Final Order for this case was issued in February 2020.

CERTIFICATE OF SERVICE
GO-96B Distribution List

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have on this 9th of July, 2021, at Portland, OR, provided via email or US mail, a true and correct copy of PacifiCorp's Advice Letter 651-E-A to the following:

Robert M. Pocta
California Public Utilities Commission
Energy Cost of Service & Natural Gas
Room 4205
505 Van Ness Avenue
San Francisco, CA 94102
rmp@cpuc.ca.gov

Ralph Cavanagh
National Resources Defense Council
111 Sutter St. 20th Floor
San Francisco, CA 94104

Edward Randolph
Director Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Jeanne B. Armstrong
Goodin, MacBride, Squeri, Day & Lamprey
505 Sansome Street, Suite 900
San Francisco, CA 94111
jarmstrong@goodinmacbride.com

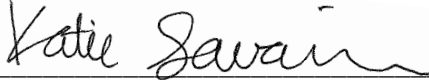
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516 US Highway 395 E
Alturas, CA 96101-4228


Katie Savarin
Coordinator, Regulatory Operations

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of PacifiCorp
(U901E), an Oregon Company, for an Order
Authorizing a General Rate Increase Effective
January 1, 2011

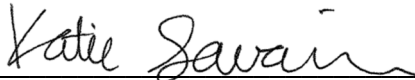
Application No. 09-11-015

And Related Matter.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **Advice Letter No. 651-E-A** on all known parties to A.09-11-015 by transmitting an e-mail message with the document attached to each person named in the official service list.

Executed on July 9, 2021, at Portland, Oregon.



Katie Savarin
Coordinator, Regulatory Operations



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: A0911015 - PACIFICORP - FOR GEN
FILER: PACIFICORP (U901E)
LIST NAME: LIST
LAST CHANGED: MAY 5, 2017

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of PACIFICORP
(U-901-E), an Oregon Company, for an Order
Authorizing a General Rate Increase Effective
January 1, 2019.

Application No. 18-04-002

And Related Matter.

Investigation 17-04-019

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **Advice Letter No. 651-E-A** on all known parties to A.18-04-002 by transmitting an e-mail message with the document attached to each person named in the official service list.

Executed on July 9, 2021 at Portland, Oregon.



Katie Savarin
Coordinator, Regulatory Operations



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

**PROCEEDING: A1804002 - PACIFICORP - FOR AN
FILER: PACIFICORP
LIST NAME: LIST
LAST CHANGED: JULY 1, 2021**

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