

1407 W. North Temple, Suite 330 Salt Lake City, UT 84116

August 30, 2023

### VIA ELECTRONIC FILING

Jan Noriyuki Commission Secretary Idaho Public Utilities Commission 11331 W Chinden Blvd. Building 8 Suite 201A Boise, ID 83714

### Re: CASE NO. PAC-E-23-19 IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER TO DECREASE THE BPA REP CREDIT EFFECTIVE OCTOBER 2023 THROUGH SEPTEMBER 2025

Dear Ms. Noriyuki:

Enclosed for electronic filing in the above-mentioned matter is Rocky Mountain Power's Application for approval to decrease the BPA REP credit in Electric Service Schedule No. 34 from \$0.010133 per kWh to \$0.007376 per kWh for qualifying customers as described in this Application.

Informal inquiries may be directed to Mark Alder, Idaho Regulatory Affairs Manager at (801) 220-2313.

Sincerely,

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Joelle R. Steward Senior Vice President, Regulation and Customer & Community Solutions

Enclosures CC: Terri Carlock Joe Dallas (ISB# 10330) 825 NE Multnomah, Suite 2000 Portland, OR 97232 Telephone: (360) 560-1937 Email: joseph.dallas@pacificorp.com

Attorney for Rocky Mountain Power

### **BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

### IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER TO DECREASE THE BPA REP CREDIT EFFECTIVE OCTOBER 2023 THROUGH SEPTEMBER 2025

) CASE NO. PAC-E-23-19
)
) APPLICATION OF
) ROCKY MOUNTAIN POWER

Rocky Mountain Power, a division of PacifiCorp ("Company" or "Rocky Mountain Power"), in accordance with Idaho Code §61-502, §61-503, and RP 052, hereby respectfully submits this application ("Application") to the Idaho Public Utilities Commission ("Commission") to decrease the Bonneville Power Administration's residential and small farm credit. In support of this Application, Rocky Mountain Power states as follows:

1. Rocky Mountain Power provides electric service to retail customers in the states of Idaho, Utah, and Wyoming. Rocky Mountain Power is a public utility in the state of Idaho and is subject to the Commission's jurisdiction with respect to terms of electric service and prices to retail customers pursuant to Idaho Code § 61-129. Rocky Mountain Power is authorized to do business in the state of Idaho and provides retail electric service to approximately 88,780 customers in the state.

### **BACKGROUND**

2. The Northwest Power Act of 1980 created the Residential Exchange Program ("REP"), which is administered by Bonneville Power Administration ("BPA"). The REP provides some of the benefits of the low-cost Columbia River Power System to participating utilities to pass onto eligible residential, small farm and irrigation customers as credits on their electric bills.

3. Rocky Mountain Power, BPA, other investor-owned utilities, public utility districts, and municipalities in the northwest are parties to the REP Settlement Implementation Agreement that determined the level of REP benefits the Company receives. Through this agreement, BPA provides REP benefits to utilities, which pass those benefits onto qualifying residential, small farm and irrigation customers in Idaho, Oregon, and Washington.

4. Under the terms of the agreement, BPA has the right to review the Company's proposed eligible load and make determinations regarding the benefit eligibility of Rocky Mountain Power's customers. BPA has developed Customer Load Eligibility Guidelines ("CLEG") to provide guidance to participating utilities to help determine whether residential, small farm, and irrigation customers are eligible to receive REP benefits.

5. To qualify to participate in the REP, BPA has provided the following CLEG definitions: (1) A residence is a structure used by one or more persons for daily living and associated activities; (2) A residence is eligible for REP benefits as long as its purpose is to provide shelter on a non-transient basis (greater than 30 days); (3) A farm consists of one or more parcels of land owned or leased by one or more persons or entities (including partnerships, corporations, and any legal entity capable of owning farm land except the government as defined in the CLEG) that is used primarily for agriculture; (4) Irrigation/pumping load used for farming and agricultural purposes may receive REP benefits for up to a maximum of 222,000 kilowatt-hours per month per

farm owner; and (5) Two or more parcels of farm land under the same ownership within the utility's service area, whether contiguous or non-contiguous, are treated as a single farm.

6. In 2001, parties in a BPA REP case negotiated a settlement for the allocation of REP benefits covering the period from 2002 through 2008. This settlement was later appealed by a group of northwest public utility districts, ("PUD"), claiming the settlement did not follow BPA's prescribed procedures for calculating the REP credits and that the settlement provided too large a share of the REP benefits to investor-owned utilities ("IOUs"). The court ruled in favor of the PUDs and ordered the parties to recalculate the REP benefits based on BPA's prescribed methodology.

7. During these negotiations, the Company continued to provide a REP credit to customers, ultimately allocating more REP benefits than the Company had received from BPA, which created a liability balance owed to the Company from customers. From 2007 until December 1, 2011, the BPA REP was cancelled for Rocky Mountain Power's customers in Idaho.

8. Pursuant to the court order, the allocation of the BPA's REP credit was recalculated, and the participating IOUs were ordered to pay back the excess benefits they had received. The agreement allowed the IOUs to refund the excess REP credits ("look back payment") by netting the look back payment against future REP benefits through BPA fiscal year 2021 which allowed the IOUs to begin providing a small credit to qualifying customers. 2021 was the last year of the look back payment.

### **BPA REP RATE**

9. Currently Electric Service Schedule No. 34 - Pacific Northwest Electric Power Planning and Conservation Act Residential and Farm Kilowatt-Hour Credit, ("Schedule 34"), is \$0.010133 per kWh. This credit was established in 2021 based on an annual BPA REP credit of \$10.3 million.

10. BPA issued the final Average System Cost, ("ASC"), report for the REP for fiscal year 2024 through 2025 (October 2023 through September 2025). While PacifiCorp's ASC increased, the increase was less than the other investor-owned utilities ("IOUs"). A comparison of the ASC for the six northwest IOUs is provided in Table 1.

Table 1									
Utility	FY2	2024-25	FY	2022-23	Inc	r/(Decr)			
Avista	\$	70.61	\$	62.93	\$	7.68			
Idaho Power	\$	66.03	\$	58.17	\$	7.86			
NorthWestern Energy	\$	83.73	\$	68.34	\$	15.39			
PacifiCorp	\$	84.08	\$	77.61	\$	6.47			
Portland General Electric	\$	80.83	\$	70.09	\$	10.74			
Puget Sound	\$	81.53	\$	67.28	\$	14.25			

11. PacifiCorp's fiscal year 2024 through 2025 allocation of the BPA REP credit decreased approximately \$11.9 million, from \$86.6 million in 2023 to \$74.7 million. Idaho's share of PacifiCorp's REP allocation, prior to any current balance adjustments, also decreased slightly from 11.76 percent to 11.69 percent. The BPA REP credit available to qualifying Idaho customers from October 1, 2023, through September 30, 2025, is \$17.5 million, reduced by a negative REP balance of \$1.6 million in Idaho's REP balancing account for a net amount of \$15.86 million to amortize over the next two years for an annual credit of \$7.93 million per year. The \$7.93 million REP credit was divided by calendar year 2022 usage level of the qualifying customers of approximately 1.07 GWh, to produce the Schedule No. 34 rate of \$0.007376 per kWh.

### **RETAIL RATE DESIGN**

12. Provided with this Application are three attachments for informational purposes: Attachment 1 summarizes the incremental increase to retail revenues associated with the BPA REP credit of approximately \$2,964,000 by rate schedule; Attachment 2 summarizes the calculation of Schedule

No. 34 rate; and Attachment 3 is a summary of the allocation between PacifiCorp states of the BPA REP benefits.

### **COMMUNICATIONS**

13. Included with this application is a copy of the press release which will be issued on August 30,

2023, and a copy of the Customer Notice which will be included with customers' bills beginning

September 5, 2023, and will run for a full billing cycle.

14. Communications regarding this filing should be addressed to:

Mark Alder Idaho Regulatory Affairs Manager Rocky Mountain Power 1407 West North Temple, Suite 330 Salt Lake City, Utah 84116 Telephone: (801) 220-2313 Email: <u>mark.alder@pacificorp.com</u>

Joe Dallas (*ISB# 10330*) 825 NE Multnomah, Suite 2000 Portland, OR 97232 Telephone: (360) 560-1937 Email:joseph.dallas@pacificorp.com

In addition, Rocky Mountain Power requests that all data requests regarding this

Application be sent in Microsoft Word to the following:

By email (preferred): datarequest@pacificorp.com

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

Informal questions may be directed to Mark Alder, Idaho Regulatory Affairs Manager at

(801) 220-2313.

### **MODIFIED PROCEDURE**

15. Rocky Mountain Power believes that a hearing is not necessary to consider the issues presented herein and respectfully requests that this Application be processed under Modified Procedure; i.e., by written submissions rather than by hearing, RP 201. If, however, the Commission determines that a technical hearing is required, the Company stands ready to prepare and present testimony in such hearing.

### **REQUEST FOR RELIEF**

16. The Company respectfully requests that the Commission issue an order approving Schedule 34 credit of \$0.007376 per kWh for rate schedules 1, 6A, 7A, 10, 23A, 35A and 36 effective October 1, 2023, through September 30, 2025.

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission issue an order authorizing that this matter be processed under Modified Procedure and approve the change to Electric Service Schedule No. 34, Pacific Northwest Electric Power Planning and Conservation Act Residential and Farm Kilowatt-Hour Credit, with an October 1, 2023, rate effective date.

DATED this 30<sup>th</sup> day of August 2023.

Respectfully submitted, ROCKY MOUNTAIN POWER

Joe Dallas (*ISB# 10330*) 825 NE Multnomah, Suite 2000 Portland, OR 97232 Telephone: (360) 560-1937 Email:joseph.dallas@pacificorp.com

Attorney for Rocky Mountain Power

## Exhibit 1

### EXHIBIT 1 ROCKY MOUNTAIN POWER ESTIMATED IMPACT OF PROPOSED REVENUES ON FORECAST PRESENT REVENUES FROM ELECTRIC SALES TO ULTIMATE CONSUMERS DISTRIBUTED BY RATE SCHEDULES IN IDAHO HISTORIC 12 MONTHS ENDED DECEMBER 2022

						Sch 3	34		
Line			Average		<b>Revenue (\$000)</b>	Present	Proposed	Net Ch	ange
No.	Description	Sch.	Customers	MWH	Present	(\$000)	(\$000)	(\$000)	%
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
	Residential Sales								
1	Residential Service	1	60,148	596,356	68,127	(\$6,043)	(\$4,399)	\$1,644	2.6%
2	Residential Optional TOD	36	10,371	176,206	17,438	(\$1,785)	(\$1,300)	\$486	3.1%
3	AGA Revenue			2,602	1,219			\$0	0.0%
4	Total Residential		70,519	775,164	\$86,784	(\$7,828)	(\$5,698)	\$2,130	2.7%
5	<u>Commercial &amp; Industrial</u>								
6	General Service - Large Power	6	1,134	313,326	24,875			\$0	0.0%
7	General Svc Lg. Power (R&F)	6A	189	22,495	1,914	(\$228)	(\$166)	\$62	3.7%
8	Subtotal-Schedule 6		1,323	335,821	26,789	(\$228)	(\$166)	\$62	0.2%
9	General Service - High Voltage	9	18	238,732	14,047			\$0	0.0%
10	Irrigation	10	5,267	615,969	55,647	(\$2,431)	(\$1,770)	\$662	1.2%
11	General Service	23	8,455	209,850	19,749			\$0	0.0%
12	General Service (R&F)	23A	2,562	39,844	3,931	(\$404)	(\$294)	\$110	3.1%
13	Subtotal-Schedule 23		11,017	249,694	23,680	(404)	(294)	110	0.5%
14	General Service Optional TOD	35	4	378	41			\$0	0.0%
15	Special Contract 1	400	1	1,396,300	80,614			\$0	0.0%
16	AGA Revenue			(9,369)	\$2,176			\$0	0.0%
17	Total Commercial & Industrial		17,629	2,827,525	\$202,994	(\$3,063)	(\$2,230)	\$833	0.4%
18	Public Street Lighting								
19	Security Area Lighting	7	181	225	45			\$0	0.0%
20	Security Area Lighting (R&F)	7A	121	98	23	(\$1.0)	(\$0.7)	\$0.3	1.2%
21	Street Lighting - Company	11	60	187	80			\$0	0.0%
22	Street Lighting - Customer	12	271	2,459	377			\$0	0.0%
23	AGA Revenue			(26)	(\$6)			\$0	
24	<b>Total Public Street Lighting</b>		632	2,942	\$520	(\$1.0)	(\$0.7)	\$0.3	0.1%
25	Total Sales to Ultimate Customers		88,780	3,605,631	\$290,298	(\$10,892)	(\$7,929)	\$2,964	1.1%

# Exhibit 2

### EXHIBIT 2 ROCKY MOUNTAIN POWER CALCULATION OF PROPOSED BPA CREDIT SCHEDULE 34 IN IDAHO HISTORIC 12 MONTHS ENDED DECEMBER 2022

		Total	BPA	Present Sch 3	4 Credit	Proposed Sch 34 Credit		
Description	Sch.	MWH	MWH	Rev (\$000)	(¢/kWh)	Rev (\$000)	(¢/kWh)	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
<u>Residential</u>								
Residential Service	1	596,356	596,356	(\$6,043)	(1.0133)	(\$4,399)	(0.7376)	
Residential Optional TOD	36	176,206	176,206	(\$1,785)	(1.0133)	(\$1,300)	(0.7376)	
<u>Commercial &amp; Industrial</u>								
General Svc Lg. Power (R&F)	6A	22,495	22,495	(\$228)	(1.0133)	(\$166)	(0.7376)	
Irrigation	10	615,969	239,948	(\$2,431)	(1.0133)	(\$1,770)	(0.7376)	
General Service (R&F)	23A	39,844	39,844	(\$404)	(1.0133)	(\$294)	(0.7376)	
Public Street Lighting								
Security Area Lighting (R&F)	7A	98	98	(\$1)	(1.0133)	(\$1)	(0.7376)	
Total		1,450,967	1,074,946	(\$10,892)	(1.0133)	(\$7,929)	(0.7376)	

# Exhibit 3

# EXHIBIT 3 Allocation of Total PacifiCorp REP Benefits For FY-2024 and FY-2025 By State

			Total Propo	Net REP Benefits			
<u>State</u>	Qualifying kWh <sup>(1)</sup>	Initial Amount \$ <sup>(2)</sup>	REP Credit IOU Allocated ¢/kWh Amount \$		REP Credit ¢/kWh	Current Balance 7-31-23	FY-2024 Amount \$
Oregon	6,475,025,299	\$51,327,067	0.7927	\$51,327,067	0.7927	(\$785,968)	\$50,541,099
Washington	1,842,662,358	\$14,606,654	0.7927	\$14,606,654	0.7927	(\$1,996,937)	\$12,609,712
Idaho	1,101,470,518	\$8,731,279	0.7927	\$8,731,279	0.7927	(\$1,604,039)	\$7,127,240
Total PacifiCorp	9,419,158,175	\$74,665,000	0.7927	\$74,665,000	0.7927	(\$4,386,943)	\$70,278,057
Ch	ieck	\$74,665,000		\$74,665,000			

### For October 1, 2024 - September 30, 2025 (FY-2025)

			Total Propo	Net REP Benefits			
<u>State</u>	Qualifying kWh <sup>(1)</sup>	Amount Amount \$ <sup>(2)</sup>	REP Credit ¢/kWh	Amount Amount \$	REP Credit ¢/kWh	Current Balance 7-31-23	FY-2025 Amount \$
Oregon	6,475,025,29	9 \$51,327,067	0.7927	\$51,327,067	0.7927	\$0	\$51,327,067
Washington	1,842,662,35	\$14,606,654	0.7927	\$14,606,654	0.7927	\$0	\$14,606,654
Idaho	1,101,470,51	8 \$8,731,279	0.7927	\$8,731,279	0.7927	\$0	\$8,731,279
Total PacifiCorp	9,419,158,17		0.7927	\$74,665,000	0.7927	\$0	\$74,665,000
	Check	\$0		\$0			

### For Two-Year Rate Period: October 1, 2023 - September 30, 2025

For Two-Year Rate Period: October 1, 2023 - September 30, 2025										
ANNUAL AVERAGE			Total Propo	sed Benefit	Net REP B	REP				
	Qualifying	Amount	REP Credit	Amount	2-YR Rate Period Total		Benefits			
<u>State</u>	kWh <sup>(1)</sup>	Amount \$ <sup>(2)</sup>	¢/kWh	Amount \$	¢/kWh	Balance 7-31-23	Amount \$	per Year		
Oregon	12,950,050,598	\$102,654,134	0.7927	\$102,654,134	0.7927	(\$785,968)	\$101,868,166	\$50,934,083		
Washington	3,685,324,716	\$29,213,308	0.7927	\$29,213,308	0.7927	(\$1,996,937)	\$27,216,371	\$13,608,186		
Idaho	2,202,941,035	\$17,462,558	0.7927	\$17,462,558	0.7927	(\$1,604,039)	\$15,858,519	\$7,929,260		
Total PacifiCorp	18,838,316,349	\$149,330,000	0.7927	\$149,330,000	0.7927	(\$4,386,943)	\$144,943,057	\$72,471,528		

**Proposed Tariffs** 



I.P.U.C. No. 1

Ninth Eighth Revision of Sheet No. 34.1 Canceling Eighth Seventh Revision of Sheet No. 34.1

### **ROCKY MOUNTAIN POWER**

### **ELECTRIC SERVICE SCHEDULE NO. 34**

### **STATE OF IDAHO**

Pacific Northwest Electric Power Planning and Conservation Act Residential and Farm Kilowatt-Hour Credit

**APPLICATION AND AVAILABILITY:** This Schedule is applicable and available to qualifying Residential and/or Farm Customers of the Company under the jurisdiction of the Idaho Public Utilities Commission.

**MONTHLY RATES**: The monthly charges for service under each of the Electric Service Schedules shown below shall be reduced by the appropriate kilowatt-hour credit for all qualifying kilowatt-hours of residential and/or farm use.

Kilowatt-Hour Credit Adjustments:

Irrigation Customers: Schedule No. 10

Non-Irrigation Customers: Schedule Nos. 1, 6A, 7A, 23A 35A, 36 \$0.0<u>07376</u>10133 per kWh

\$0.0<u>07376</u>10133 per kWh

(continued)

Submitted Under Case No. PAC-E-23-19PAC-E-21-07

ISSUED: <u>August 30, 2023</u>November 8, 2021 October 1, 2023January 1, 2022

EFFECTIVE:



I.P.U.C. No. 1

Ninth Revision of Sheet No. 34.1 Canceling Eighth Revision of Sheet No. 34.1

### **ROCKY MOUNTAIN POWER**

**ELECTRIC SERVICE SCHEDULE NO. 34** 

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Irrigation Customers: Schedule No. 10

Non-Irrigation Customers: Schedule Nos. 1, 6A, 7A, 23A 35A, 36 \$0.007376 per kWh

\$0.007376 per kWh

(continued)

**Customer Notices** 

## BPA Credit Adjustment to Idaho Customer Power Bills Para más información en cómo este cambio impactará su factura, llame al 888-225-2611.

On August 30, 2023, Rocky Mountain Power filed for an adjustment to the Bonneville Power Administration credit in Idaho.

The company was authorized by the Idaho Public Utilities Commission to pass on a federal billing credit to certain residential or farm customers in Idaho. The annual credit authorized for Rocky Mountain Power Idaho customers has decreased from \$10.3 million annually to \$7.93 million annually. The authorized change in the credit increases the annual power bill of a typical residential customer by \$27.34. The credit will be effective from October 1, 2023, through September 30, 2025.

The Bonneville Power Administration's Residential Exchange Program is designed to share the benefits of the Federal Columbia River Power System with residential and small farm customers who receive service from investor-owned electric utilities in Idaho and other Pacific Northwest states. The program began in 1980 through the Bonneville Power Administration, a federal power marketing agency under the U.S. Department of Energy. The BPA benefits have significantly lowered the bills of qualifying residential and small farm customers during the course of the program. The exchange benefits are passed directly to customers by Rocky Mountain Power and have no effect on the utility's revenues.

The following is a summary of the percentage impacts by customer class:

- Residential Schedule 1 2.6% increase
- Residential Schedule 36 3.1% increase
- General Service Schedule 6A 3.7% increase
- Irrigation Service Schedule 10 1.2% increase
- General Service Schedule 23A 3.1% increase
- Public Street Lighting 7A 1.2% increase

We understand the impact that price increases have on our customers and will work to mitigate the impact of the BPA credit change as much as possible. Customers can visit **RockyMountainPower.net/Wattsmart** for tips and information on how to save energy and money.

The commission must approve the proposed changes before they can take effect. A copy of the company's application is available for public review on the commission's website, **www.puc.idaho.gov**, under **Case No. PAC-E-23-19**. Customers may also subscribe to the commission's RSS feed to receive periodic updates via email. The request is required to be available at the company's offices in Rexburg, Preston, Shelley and Montpelier, although the company urges customers to visit our website at **RockyMountainPower.net/Rates** for more information.

Idaho Public Utilities Commission www.puc.idaho.gov 11331 W. Chinden Blvd. Building 8, Suite 201-A Boise, ID 83714

#### **Rocky Mountain Power offices**

Rexburg – 127 East Main Preston – 509 S. 2nd East Shelley – 852 E. 1400 North Montpelier – 24852 U.S. Hwy 89





FOR IMMEDIATE RELEASE Media Hotline: 801-220-5018

August 30, 2023

### BPA credit adjustment to Idaho customer power bills

**BOISE, Idaho**—Rocky Mountain Power was authorized by the Idaho Public Utilities Commission to pass on a federal billing credit to certain residential or farm customers in Idaho. The annual credit authorized for Idaho customers of Rocky Mountain Power has decreased from \$10.3 million annually to \$7.93 million annually. The change to the authorized credit increases the annual power bill of a typical residential customer by about \$27.34 and takes effect beginning October 1, 2023 through September 30, 2025.

The Bonneville Power Administration Residential Exchange Program is designed to share the benefits of the Federal Columbia River Power System with residential and small farm customers of investor-owned electric utilities in Idaho and other Northwest states. The program began in 1980 through the Bonneville Power Administration, a federal power marketing agency under the U.S. Department of Energy. The BPA benefits have significantly lowered the bills of qualifying residential and small farm customers during the course of the program. The exchange benefits are passed directly to customers by Rocky Mountain Power and have no effect on the utility's revenues.

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### Idaho Public Utilities Commission

### **Rocky Mountain Power offices**

www.puc.idaho.gov

11331 W. Chinden Blvd. Building 8, Suite 201-A Boise, ID 83714 Rexburg – 127 East Main Preston – 509 S. 2nd East Shelley – 852 E. 1400 North Montpelier – 24852 U.S. Hwy 89

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### **About Rocky Mountain Power**

Rocky Mountain Power provides safe and reliable electric service to more than 1.2 million customers in Utah, Wyoming and Idaho. The company supplies customers with electricity from a diverse portfolio of generating plants including hydroelectric, thermal, wind, geothermal and solar resources. Rocky Mountain Power is part of PacifiCorp, one of the lowest-cost electricity providers in the United States, with two million customers in six western states. For more information, visit:

www.rockymountainpower.net