

DOCKETED

Docket Number:	21-OIR-01
Project Title:	Rulemaking to Amend Regulations Governing the Power Source Disclosure Program
TN #:	259726
Document Title:	PacifiCorp 10-28-24 Comments
Description:	N/A
Filer:	System
Organization:	Kieran O'Donnell
Submitter Role:	Public
Submission Date:	10/28/2024 1:00:24 PM
Docketed Date:	10/28/2024

*Comment Received From: Kieran O'Donnell
Submitted On: 10/28/2024
Docket Number: 21-OIR-01*

PacifiCorp 10 28 24 Comments

Additional submitted attachment is included below.

October 28, 2024

VIA ELECTRONIC FILING

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 21-OIR-01
715 P Street
Sacramento, CA 95814-5512

Re: Docket 21-OIR-01 — Power Source Disclosure Pre-Rulemaking Amendments

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) respectfully submits the following comments in response to the California Energy Commission's (Commission) May 17, 2024, Notice of Proposed Action, Rulemaking to Amend Regulations Governing the Power Source Disclosure Program.

I. PacifiCorp supports the changes pertaining to multi-jurisdictional electrical corporations.

PacifiCorp supports and appreciates the Commission's addition of Section 1393(j) of Chapter 3, Article 5 of Title 20 in the California Code of Regulations. PacifiCorp's unique multistate service area shares load across six states, including Washington, Oregon and California, and the Company allocates resources and costs based on an agreed-upon cost allocation methodology approved by each of these six state utility commissions. The proposed addition of Section 1393(j) ensures the Company can accurately report the resources its California retail customers pay for.

II. PacifiCorp recommends the Commission allow companies to report transmission loss factors on a system-wide basis.

Sections 1392(a)(8)(A) and (B) direct retail suppliers to apply a default transmission and distribution loss factor, calculated annually by the Commission, *for each specified resource* and to unspecified power. In the alternative, Section 1392(a)(8)(C) allows a retail supplier to calculate and report, with substantiating documentation, an alternative to the default loss factor for any specified resource.

The Company does not have the data internally to calculate transmission losses on a resource-by-resource basis, and transmission and distribution line losses are cost allocated to customers across the six states PacifiCorp serves, much like its generation portfolio and emissions. Further, if the alternative to Section 1392(a)(8)(B) would be to submit losses on a resource-by-resource basis, losses from balancing area interchanges or transformer line losses may not be properly captured in the data submitted to the Commission. PacifiCorp has over 400 resources in its portfolio, an overwhelming majority of which are outside California. If the Commission adopts the current proposed regulation, reporting an alternative to Section

California Energy Commission

October 28, 2024

Page 2

1392(a)(8)(B) becomes extremely burdensome even if the Company reported losses on a cost allocated basis for each resource.

As an alternative, the Company recommends the Commission allow companies to submit a system-wide transmission loss factor, or include modified requirements for multi-jurisdictional electrical corporations.

The Company appreciates all the Commission's work on this docket, including the attention dedicated to small and multi-jurisdictional electrical corporations.

Sincerely,

/s/

Kieran O'Donnell

Director, Energy and Environmental Policy

PacifiCorp

825 NE Multnomah Street, Suite 2000

Portland, OR 97232

Kieran.ODonnell@PacifiCorp.com