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IDAHO PUBLIC
UTILITIES COMMISSION

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

August 30, 2021

VIA ELECTRONIC DELIVERY

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

**Re: CASE NO. PAC-E-21-18
IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN
POWER TO INCREASE THE BPA REP CREDIT EFFECTIVE OCTOBER
2021 THROUGH SEPTEMBER 2023**

Dear Ms. Noriyuki:

Enclosed for electronic filing in the above-mentioned matter is Rocky Mountain Power's Application for approval to increase the BPA REP credit in Electric Service Schedule No. 34 from \$0.008403 per kWh to \$0.010133 per kWh for qualifying customers as described in this Application.

Very truly yours,

Joelle Steward
Vice President, Regulation

Enclosures

Emily L. Wegener (ISB#11614)
Rocky Mountain Power
1407 W. North Temple, Suite 320
Salt Lake City, Utah 84116
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Attorney for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION) CASE NO. PAC-E-21-18
OF ROCKY MOUNTAIN POWER TO)
INCREASE THE BPA REP CREDIT) APPLICATION OF
EFFECTIVE OCTOBER 2021 THROUGH) ROCKY MOUNTAIN POWER
SEPTEMBER 2023)**

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 increase 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 85,600 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 to 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.

BPA REP RATE

9. Currently the rate in Electric Service Schedule No. 34 - Pacific Northwest Electric Power Planning and Conservation Act Residential and Farm Kilowatt-Hour Credit, ("Schedule 34"), is \$0.008403 per kWh. This credit was established in 2017 based on an annual BPA REP credit of \$8.5 million. In 2019, the Company requested authorization to keep Schedule No. 34 rate

at \$0.008403 per kWh, effective October 1, 2019, through September 30, 2021, based on an annual BPA REP credit of \$8.2 million.

10. BPA issued the final Average System Cost, (“ASC”), report for the REP for fiscal year 2022 through 2023 (October 2021 through September 2023). While PacifiCorp’s ASC decreased, the reduction 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	FY2022-23	FY2020-21	Incr/(Decr)
Avista	\$ 62.93	\$ 67.60	\$ (4.67)
Idaho Power	\$ 58.17	\$ 64.41	\$ (6.24)
NorthWestern Energy	\$ 68.34	\$ 82.91	\$ (14.57)
PacifiCorp	\$ 77.61	\$ 79.43	\$ (1.82)
Portland General Electric	\$ 70.09	\$ 77.53	\$ (7.44)
Puget Sound	\$ 67.28	\$ 75.72	\$ (8.44)

11. PacifiCorp’s fiscal year 2022 through 2023 allocation of the BPA REP credit increased approximately \$18.7 million, from \$67.9 million in 2019 to \$86.6 million. In addition, 2021 was the last year of the \$4.3 million look back payment. These changes combined result in a net increase to PacifiCorp’s REP credit of \$23.0 million. Idaho’s share of PacifiCorp’s REP allocation also increased slightly from 11.41 percent to 12.34 percent. The BPA REP credit available to qualifying Idaho customers from October 1, 2021, through September 30, 2023, is \$20.3 million, plus an undistributed balance of \$0.2 million in Idaho’s REP balancing account for a total of \$20.5 million to amortize over the next two years for an annual credit of \$10.3 million per year. The \$10.3 million REP credit was divided by calendar year 2019 usage level of the qualifying customers of approximately 1.1 GWh, to produce the Schedule No. 34 rate of \$0.010133 per kWh.

RETAIL RATE DESIGN

12. Provided with this Application are three exhibits for informational purposes: Exhibit 1 summarizes the incremental decrease to retail revenues associated with the BPA REP credit of approximately \$1,752,000 by rate schedule; Exhibit 2 summarizes the calculation of Schedule No. 34 rate; and Exhibit 3 is a summary of the allocation between PacifiCorp states of the BPA REP benefits.

COMMUNICATIONS

13. Communications regarding this filing should be addressed to:

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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 Ted Weston, Idaho Regulatory Affairs Manager at (801) 220-2963.

MODIFIED PROCEDURE

14. 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

15. The Company respectfully requests that the Commission issue an order approving Schedule 34 credit of \$0.010133 per kWh for rate schedules 1, 6A, 7A, 23A, 35A, 36, and 19 effective October 1, 2021, through September 30, 2023.

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, 2021, rate effective date.

DATED this 30th day of August 2021.

Respectfully submitted,
ROCKY MOUNTAIN POWER

A handwritten signature in blue ink that reads "Emily Wegener". The signature is written in a cursive style and is positioned above a horizontal line.

Emily Wegener
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Attorney for Rocky Mountain Power

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 2019

Description (1)	Sch. (2)	Average Customers (3)	MWH (4)	Revenue (\$000) Present (5)	Sch 34		Net Change	
					Present (\$000) (6)	Proposed (\$000) (7)	(\$000) (8)	% (9)
Residential								
Residential	1	54,475	523,338	\$57,133	(\$4,398)	(\$5,303)	(\$905)	-1.7%
Optional TOD	36	11,462	196,424	\$18,124	(\$1,651)	(\$1,990)	(\$340)	-2.1%
				\$4			\$0	0.0%
Commercial		65,937	719,763	\$75,261	(\$6,048)	(\$7,293)	(\$1,245)	-1.8%
Industrial								
- Large Power	6	1,134	346,008	\$25,711			\$0	0.0%
Large Power (R&F)	6A	203	26,817	\$2,215	(\$225)	(\$272)	(\$46)	-2.3%
Small Power		1,336	372,824	\$27,926	(\$225)	(\$272)	(\$46)	-0.2%
- High Voltage	9	16	118,965	\$7,288			\$0	0.0%
	10	5,844	616,158	\$53,962	(\$1,903)	(\$2,295)	(\$392)	-0.8%
Space Heating	19	87	5,091	\$413			\$0	0.0%
	23	7,483	178,005	\$16,759			\$0	0.0%
(R&F)	23A	2,521	39,728	\$3,864	(\$334)	(\$403)	(\$69)	-1.9%
Small Power		10,004	217,733	\$20,623	(\$334)	(\$403)	(\$69)	-0.3%
Optional TOD	35	2	278	\$22			\$0	0.0%
Rate 1	400	1	1,370,322	\$78,860			\$0	0.0%
Rate 2	401	1	103,832	\$5,821			\$0	0.0%
				\$602			\$0	0.0%
Commercial & Industrial		17,291	2,805,205	\$195,516	(\$2,462)	(\$2,969)	(\$507)	-0.3%
Lighting								
Lighting	7	185	274	\$105			\$0	0.0%
Lighting (R&F)	7A	129	106	\$43	(\$0.9)	(\$1.1)	(\$0.2)	-0.4%
- Company	11	56	154	\$72			\$0	0.0%
- Customer	12	250	2,419	\$419			\$0	0.0%
				\$0			\$0	0.0%
Street Lighting		620	2,952	\$639	(\$0.9)	(\$1.1)	(\$0.2)	0.0%
Ultimate Customers		83,848	3,527,919	\$271,416	(\$8,511)	(\$10,263)	(\$1,752)	-0.7%

EXHIBIT 2
ROCKY MOUNTAIN POWER
CALCULATION OF PROPOSED BPA CREDIT SCHEDULE 34 IN IDAHO
HISTORIC 12 MONTHS ENDED DECEMBER 2019

Sch.	Total MWH	BPA MWH	Present Sch 34 Credit		Proposed Sch 34 Credit	
			Rev (\$000)	(¢/kWh)	Rev (\$000)	(¢/kWh)
(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	523,338	523,338	(\$4,398)	(0.8403)	(\$5,303)	(1.0133)
36	196,424	196,424	(\$1,651)	(0.8403)	(\$1,990)	(1.0133)
F) 6A	26,817	26,817	(\$225)	(0.8403)	(\$272)	(1.0133)
10	616,158	226,439	(\$1,903)	(0.8403)	(\$2,295)	(1.0133)
23A	39,728	39,728	(\$334)	(0.8403)	(\$403)	(1.0133)
7A	106	106	(\$1)	(0.8403)	(\$1)	(1.0133)
	1,402,572	1,012,852	(\$8,511)	(0.8403)	(\$10,263)	(1.0133)

EXHIBIT 3
Allocation of Total PacifiCorp REP Benefits
For FY-2022 and FY-2023
By State

For October 1, 2021 - September 30, 2022

State	Qualifying kWh ⁽¹⁾	Total Proposed Benefit				Net REP Benefits	
		Initial Amount \$ ⁽²⁾	REP Credit ¢/kWh	IOU Allocated Amount \$	REP Credit ¢/kWh	Current Balance 7-31-21	FY-2022 Amount \$
Oregon	6,221,377,730	\$58,916,715	0.9470	\$58,916,715	0.9470	(\$7,514,519)	\$51,402,196
Washington	1,850,060,948	\$17,520,157	0.9470	\$17,520,157	0.9470	\$395,340	\$17,915,497
Idaho	1,075,721,418	\$10,187,128	0.9470	\$10,187,128	0.9470	\$152,590	\$10,339,718
Total PacifiCorp	9,147,160,097	\$86,624,000	0.9470	\$86,624,000	0.9470	(\$6,966,590)	\$79,657,410

For October 1, 2022 - September 30, 2023

State	Qualifying kWh ⁽¹⁾	Total Proposed Benefit				Net REP Benefits	
		Amount \$ ⁽²⁾	REP Credit ¢/kWh	Amount \$	REP Credit ¢/kWh	Current Balance 7-31-22	FY-2023 Amount \$
Oregon	6,221,377,730	\$58,916,715	0.9470	\$58,916,715	0.9470	\$0	\$58,916,715
Washington	1,850,060,948	\$17,520,157	0.9470	\$17,520,157	0.9470	\$0	\$17,520,157
Idaho	1,075,721,418	\$10,187,128	0.9470	\$10,187,128	0.9470	\$0	\$10,187,128
Total PacifiCorp	9,147,160,097	\$86,624,000	0.9470	\$86,624,000	0.9470	\$0	\$86,624,000

For Two-Year Rate Period: October 1, 2021 - September 30, 2023

ANNUAL AVERAGE		Total Proposed Benefit				Net REP Benefits		BP 22
State	Qualifying kWh ⁽¹⁾	Amount \$ ⁽²⁾	REP Credit ¢/kWh	Amount \$	REP Credit ¢/kWh	2-YR Rate Period Total Balance 7-31-21	Amount \$	REP Benefits per Year
Oregon	12,442,755,460	\$117,833,430	0.9470	\$117,833,430	0.9470	(\$7,514,519)	\$110,318,911	\$55,159,455
Washington	3,700,121,896	\$35,040,314	0.9470	\$35,040,314	0.9470	\$395,340	\$35,435,654	\$17,717,827
Idaho	2,151,442,837	\$20,374,256	0.9470	\$20,374,256	0.9470	\$152,590	\$20,526,846	\$10,263,423
Total PacifiCorp	18,294,320,193	\$173,248,000	0.9470	\$173,248,000	0.9470	(\$6,966,590)	\$166,281,410	\$83,140,705

⁽¹⁾ Per Settlement Agreement IOU Section 6. Base period and subsequent period average
⁽²⁾ Total REP Benefits from BP-20 Table 2.4.11
⁽³⁾ Total REP Benefits from BP-20 Table 2.4.11

	ACTUAL BASE YEAR + 12MOS.		TOTAL Rate Period	Average Rate Period	State Share %
	CY-2019(kWh)	CY-2020(kWh)			
Oregon	6,188,380,012	6,254,375,448		6,221,377,730	68.01%
Washington	1,889,171,082	1,810,950,814		1,850,060,948	20.23%
Idaho	1,055,393,824	1,096,049,013		1,075,721,418	11.76%
Total PacifiCorp	9,132,944,918	9,161,375,275		9,147,160,097	100.00%

Proposed Tariffs



I.P.U.C. No. 1

~~Six~~**Seventh** Revision of Sheet No. 34.1
Canceling ~~Sixth~~**Fifth** 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: \$0.0~~1013308403~~ per kWh
Schedule No. 10

Non-Irrigation Customers: \$0.0~~1013308403~~ per kWh
Schedule Nos. 1, 6A, 7A, 23A
35A, 36, 19 with 6A
19 with 23A, 19 with 35A

(continued)

Submitted Under Case No. PAC-E-~~217-180~~

ISSUED: August ~~30~~**18**, 20**21**~~7~~

EFFECTIVE: October 1, 20**21**~~7~~



I.P.U.C. No. 1

Seventh Revision of Sheet No. 34.1
Canceling Sixth 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: \$0.010133 per kWh
Schedule No. 10

Non-Irrigation Customers: \$0.010133 per kWh
Schedule Nos. 1, 6A, 7A, 23A
35A, 36, 19 with 6A
19 with 23A, 19 with 35A

(continued)

Submitted Under Case No. PAC-E-21-18

ISSUED: August 30, 2021

EFFECTIVE: October 1, 2021