



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

FILED
08/07/19
04:59 PM

Order Instituting Rulemaking to Consider
Authorization of a Non-Bypassable Charge to
Support California's Wildfire Fund.

Rulemaking 19-07-017
(Filed July 26, 2019)

**PREHEARING CONFERENCE STATEMENT OF PACIFICORP (U 901 E) ON THE
ORDER INSTITUTING RULEMAKING TO CONSIDER AUTHORIZATION OF A
NON-BYPASSABLE CHARGE TO SUPPORT CALIFORNIA'S WILDFIRE FUND**

Carla Scarsella
Senior Regulatory Attorney
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232
Telephone: (503) 813-6338
Facsimile: (503) 813-7262
Email: carla.scarsella@pacificorp.com

Date: August 7, 2019

Attorney for PacifiCorp

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

Order Instituting Rulemaking to Consider
Authorization of a Non-Bypassable Charge to
Support California's Wildfire Fund

Rulemaking 19-07-017
(Filed July 26, 2019)

**PREHEARING CONFERENCE STATEMENT OF PACIFICORP (U 901 E) ON THE
ORDER INSTITUTING RULEMAKING TO CONSIDER AUTHORIZATION OF A
NON-BYPASSABLE CHARGE TO SUPPORT CALIFORNIA'S WILDFIRE FUND**

In accordance with Rule 6.2 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, PacifiCorp, d/b/a Pacific Power (PacifiCorp or company), hereby submits this Prehearing Conference Statement in response to the July 26, 2019 Order Instituting Rulemaking to Consider Authorization of a Non-Bypassable Charge to Support California's Wildfire Fund (OIR) in the above-captioned proceeding.

I. INTRODUCTION

On July 26, 2019, the Commission issued an OIR to consider whether, pursuant to its authority under Public Utilities Code §701, the Commission should require certain electrical corporations to collect from ratepayers the non-bypassable charge described in Assembly Bill 1054 (Stats. 2019, ch. 79) (AB 1054) to support California's new Wildfire Fund. The OIR directs parties to submit a Prehearing Conference Statement on the draft issues for scope as set forth in ¶2.1 of the OIR including with respect to draft issue #3, an estimated revenue requirement of \$880,000,000. PacifiCorp was named as a respondent to the above captioned proceeding.¹

¹ See ¶5 of the OIR.

PacifiCorp is a multi-jurisdictional utility providing retail electric service to customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. In northern California, PacifiCorp serves approximately 45,000 customers spread over more than 11,000 square miles in portions of Del Norte, Modoc, Shasta, and Siskiyou counties. These customers account for approximately two percent of PacifiCorp's 1.9 million customers in six states. PacifiCorp is uniquely situated in comparison to the other IOUs in California because not only does it have load-service obligations in six states, but PacifiCorp's California customers are geographically-dispersed. PacifiCorp only has approximately four customers per square mile.

II. DISCUSSION

AB 1054 was enacted to address the potential of increased ratepayer costs from liabilities attaching to California's investor-owned utilities (IOUs) due to wildfires resulting from IOU infrastructure. To address this concern, in part, AB 1054 establishes a Wildfire Fund to pay eligible claims from covered wildfires. As required by AB 1054, this proceeding is to consider whether the Commission, under its authority, should require certain IOUs to impose a non-bypassable charge on their ratepayers and use the collected funds to support the Wildfire Fund, including the payment of any bonds issued pursuant to AB 1054 that are allocated to the fund.

Under AB 1054, PacifiCorp is a regional electric corporation, which is defined as an electrical corporation with less than 250,000 customer accounts within California.² For a regional electric corporation, such as PacifiCorp, to participate in the Wildfire Fund, it shall have requested to participate and have established a charge by June 30, 2020.³ Pursuant to AB 1054, PacifiCorp will not be requesting to participate in the Wildfire Fund. As a result, PacifiCorp offers no comments on the issues set forth in in ¶2.1 of the OIR, including issue #3. Because it

² AB 1054, Sec. 16, Part 6, Ch. 1, §3280(m)

³ AB 1054, Sec. 16, Part 6, Ch. 3, §3291(b)(2)

has decided not to participate in the Wildfire Fund, PacifiCorp also respectfully requests that it be removed as a respondent in the above-captioned proceeding.

III. CONCLUSION

Based the foregoing, PacifiCorp, as a regional electric corporation, has opted not to participate in the Wildfire Fund and as such offers no comments on the issues set forth in ¶2.1 of the OIR. Furthermore, PacifiCorp respectfully requests that because it will not be participating, in the Wildfire Fund, the Commission remove PacifiCorp as a respondent to the above-caption proceeding.

Respectfully submitted this August 7, 2019, at San Francisco, California.



By: Carla Scarsella

Carla Scarsella
Senior Regulatory Attorney
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232
Telephone: (503) 813-6338
Facsimile: (503) 813-7262
Email: carla.scarsella@pacificorp.com
Admitted to Practice in Illinois

Attorney for PacifiCorp