



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

**FILED**

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In the Matter of the Application of  
PACIFICORP (U-901-E), for an Order  
Authorizing a General Rate Increase  
Effective January 1, 2023.

A. 22-05-006

**PROTEST OF THE CALIFORNIA FARM BUREAU FEDERATION  
TO THE APPLICATION OF PACIFICORP (U-901-E), FOR AN ORDER  
AUTHORIZING A GENERAL RATE INCREASE EFFECTIVE JANUARY 1,  
2023.**

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Dated: June 10, 2022

## **I. INTRODUCTION**

Pursuant to Rule 2.6 of the Commission's Rules of Practice and Procedure, the California Farm Bureau Federation<sup>1</sup> (Farm Bureau) submits this Protest to PacifiCorp's Application for an Order Authorizing a General Rate Increase Effective January 1, 2023 (Application). This Protest is submitted within 30 days of the date the notice of the filing first appeared in the Daily Calendar, May 11, 2022, as required under Rule 2.6. Farm Bureau has consistently participated in PacifiCorp's general rate case proceedings. The cost implications of PacifiCorp's filing require Farm Bureau to be an active participant in this proceeding, which is requested in conjunction with the submission of this Protest.

The Application has been submitted at a time when agriculture, like many customers of PacifiCorp, are still facing tremendous economic challenges driven by COVID-19, power outages, wildfire impacts, and a severe drought. Farm Bureau has only begun to review the Application and the supporting documentation; however, a 27.9 percent base increase in revenue requirement from the Agricultural class raises significant questions about how best to retain a viable utility infrastructure without unduly penalizing ratepayers in the process. Farm Bureau intends to participate to the extent possible to ensure any proposed increases are scrutinized and ratepayer impacts are minimized.

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<sup>1</sup> The California Farm Bureau Federation is California's largest farm organization, working to protect family farms and ranches on behalf of its nearly 31,000 members statewide and as part of a nationwide network of more than 6 million members. Organized 100 years ago as a voluntary, nongovernmental and nonpartisan organization, it advances its mission throughout the state together with its 53 county Farm Bureaus.

## **II. REASONS FOR PROTEST AND NEED FOR EVIDENTIARY HEARINGS**

Farm Bureau is particularly concerned with the dramatic 25.7 percent net increase requested by PacifiCorp to increase its rate of return. As PacifiCorp points out in its Application, this is compared to a 0.9 percent requested increase in its 2019 General Rate Case. A 24.8 percent increase from the prior Phase 1 request is shocking. Farm Bureau is still in the process of reviewing and analyzing the testimony provided with the Application, but it is clear a 25.7 percent net increase will be untenable. Especially considering cursory review of the Application provides no evidence of a benefit to customers other than propping up a requested rate of return.

Farm Bureau anticipates engaging in discovery to identify both the areas of exorbitant increase and to illustrate the potential impact on Agricultural customers. In addition, it will participate in evidentiary hearings and briefing.

## **III. SCHEDULE**

It is anticipated there will be further discussions regarding the preliminary schedule PacifiCorp presented in its Application. Farm Bureau does not suggest specific adjustments to the schedule at this time; however, Farm Bureau anticipates there may be periods within the proceeding that parties who participate extensively at the Commission may see overlap requiring extensions to minimize impacts on both the parties and the Commission.

#### **IV. COMMUNICATIONS**

All correspondence, pleadings, orders, and notices in this proceeding should be sent to the following for inclusion as party status:

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In addition, the following person should be included as information only status:

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## V. CONCLUSION

Farm Bureau appreciates this opportunity to provide input at the outset of this proceeding in anticipation of identifying proposed costs that should be reduced in order to protect the livelihood of its members and all customers.

Dated: June 10, 2022

Respectfully submitted,

By   
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