



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

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

Application 22-05-006
(Filed May 5, 2022)

FILED

12/15/25
04:59 PM
A2205006

**PETITION OF PACIFICORP (U-901-E) FOR MODIFICATION OF
DECISION 25-06-052**

DOWNEY BRAND LLP
Michael B. Day
Christopher Marellich
455 Market Street, Suite 1500
San Francisco, California 94105
Telephone: 415.848.4800
Facsimile: 415.848.4801
Email: mday@downeybrand.com
cmarellich@downeybrand.com

December 15, 2025

Attorneys for PacifiCorp

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

In the Matter of the Application of
PACIFICORP (U901E) for an Order
Authorizing a General Rate Increase Effective
January 1, 2023

Application 22-05-006
(Filed May 5, 2022)

**PETITION OF PACIFICORP (U-901-E) FOR MODIFICATION
OF DECISION 25-06-052**

In accordance with Rule 16.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), PacifiCorp d/b/a Pacific Power (“PacifiCorp” or “the Company”) submits this Petition for Modification (“Petition”) of Decision (“D.”) 25-06-052 requesting that the Commission:

1. Allow PacifiCorp to file a Tier 2 Advice Letter to implement its 2025 Post-Test Year Adjustment Mechanism (“PTAM”) Attrition Factor as soon as reasonably feasible following the effective date of this decision.

Due to internal administrative issues, PacifiCorp regrettably did not file its 2025 PTAM Attrition Factor Tier 2 Advice Letter by October 15, 2025, as authorized by D.25-06-052. However, PacifiCorp maintains that there is value in allowing the Company to implement the 2025 PTAM Attrition Factor at this time. The PTAM Attrition Factor helps PacifiCorp set accurate customer rates in years between its General Rate Case (“GRC”) Applications and timely recover prudently incurred costs related to the impact of inflation on a wide variety of cost categories required to provide safe, reliable and efficient electric service to its customers. For these reasons, PacifiCorp requests that the Commission modify D.25-06-052 to allow the Company to file the Tier 2 Advice Letter to implement the 2025 PTAM Attrition Factor as soon as reasonably possible. A draft of PacifiCorp’s proposed Tier 2 Advice Letter to implement the

2025 PTAM Attrition Factor, which PacifiCorp is prepared to update and file upon a Commission decision approving this Petition, is attached as “Attachment A” to this Petition. The Company estimates that the PTAM Attrition filing will result in a rate increase of \$2.2 million or 1.2 percent on average.

PacifiCorp’ Petition is timely filed, as less than one year has elapsed since the effective date of D.25-06-052.¹

I. BACKGROUND

On May 5, 2022, PacifiCorp filed its Test Year 2023 General Rate Case (“GRC”) Application requesting authority to increase its rates for electric service in California beginning January 1, 2023. PacifiCorp also sought authorization to continue the PTAM and PTAM Attrition Factor adjustment.²

PacifiCorp’s request for continued authorization of the PTAM and PTAM Attrition Factor adjustment was unopposed by participating parties. The Commission addressed the PTAM and PTAM Attrition Factor in its Track 1 GRC Decision, D.23-12-016. In D.23-12-016, the Commission authorized PacifiCorp to file “[a] PTAM for major capital additions for 2023 as soon as reasonable feasible . . . and . . . on October 15, 2024, and in subsequent years during the rate case period,” and directed PacifiCorp to continue filing its PTAM Attrition Factor on October 15, 2024 as a Tier 2 Advice Letter, with rates effective January 1 of the year following approval of PacifiCorp’s request.³ The Commission specifically instructed PacifiCorp to make a request in its Test Year 2026 GRC Application if it sought to continue its PTAM process after

¹ CPUC Rules of Practice and Procedure, Rule 16.4 (d).

² See A.22-05-006, p. 4 (Filed May 5, 2022).

³ See D.23-12-016, p. 10, Ordering Paragraph 5, p. 55 (Issued December 15, 2023).

2025.⁴

On May 5, 2025, PacifiCorp filed its Petition for Modification of Decision No. 23-12-016.⁵ PacifiCorp requested that the Commission grant a one-year extension on filing its Test Year 2026 GRC Application from May 2025 to May 2026. PacifiCorp made its request because the rates approved in its Test Year 2023 GRC Application were not fully implemented until April 15, 2025,⁶ and because PacifiCorp's anticipated depreciation study to gather new data on plant decommissioning costs could not be completed before May 2025.⁷ In conjunction with its one-year extension request, PacifiCorp sought authorization to: (1) continue the use of the ECAC mechanism in 2025 and 2026; (2) submit PTAM filings in 2025 and 2026 to account for major capital additions and inflation; and (3) to continue the use of its PTAM Attrition Factor in 2025 and 2026.⁸ The Commission approved PacifiCorp's May 5, 2025 Petition for Modification through D.25-06-052. With respect to the PTAM and the PTAM Attrition Factor filing, Ordering Paragraph 1.b of D.25-06-052 amends Ordering Paragraph 5 of D.23-12-016 to state the following:

PacifiCorp, doing business as Pacific Power, may continue the use of the Energy Cost Adjustment Clause and Post-Test Year Adjustment Mechanism (PTAM) for the years 2023-2026, and the PTAM Attrition Factor may continue to be filed for 2025 and 2026 on October 15, as a Tier 2 Advice Letter, with rates effective January 1 of the year following

⁴ See D.23-12-016, p. 11.

⁵ See PacifiCorp's Petition for Modification of Decision No. 23-12-016 (Issued May 5, 2025).

⁶ Track 1 rate changes from PacifiCorp's last GRC took effect on January 12, 2024. Track 2, which approved the costs tracked in the Wildfire Mitigation Memorandum Accounts took effect on April 4, 2025.

⁷ As PacifiCorp noted, the Track 2 Decision (D.25-02-008) resolving the remaining issues of PacifiCorp's Test Year 2023 GRC was issued on February 20, 2025. The rate changes authorized by the Track 2 decision were implemented by Advice Letter on April 15, 2025. See PacifiCorp's Petition for Modification of Decision No. 23-12-016, pp. 4-6 (Issued May 5, 2025).

⁸ See PacifiCorp's Petition for Modification of Decision No. 23-12-016, pp. 5-6 (Issued May 5, 2025).

approval of PacifiCorp's request.⁹

II. PROPOSED MODIFICATIONS

PacifiCorp regrets that it did not file its 2025 PTAM Attrition Factor Tier 2 Advice Letter by October 15, 2025 due to an administrative oversight. However, PacifiCorp's maintains that implementing the PTAM Attrition Factor at this time is appropriate. Consistent with the Commission's finding, the PTAM “[is an] efficient means for setting fair and reasonable rates.”¹⁰ Allowing PacifiCorp to implement its PTAM Attrition Factor enables the Company to set accurate rates and recover costs that PacifiCorp prudently incurred. In particular, the annual use of the PTAM Attrition Factor helps prevent shortfalls in the expenses required to continue to provide safe, reliable, and efficient electric service to PacifiCorp's customers due to the impact of inflation across a wide variety of cost categories.

To allow PacifiCorp to file its 2025 PTAM Attrition Factor Tier 2 Advice Letter filing, PacifiCorp requests that the Commission amend Ordering Paragraph 1.b of D.25-06-052 to read:

b. Ordering Paragraph 5: PacifiCorp, doing business as Pacific Power may continue the use of the Energy Cost Adjustment Clause and Post-Year Adjustment Mechanism (PTAM) for the years 2023-2026, and the PTAM Attrition Factor may continue to be filed for 2025 and 2026 ~~on October 15~~, as a Tier 2 Advice Letter. PacifiCorp may file its 2025 PTAM Attrition Factor Tier 2 Advice Letter as soon as reasonably feasible following the effective date of this decision.¹¹

III. CONCLUSION

PacifiCorp regrets its oversight in not filing its PTAM 2025 Attrition Factor by October 15, 2025. Nevertheless, PacifiCorp maintains that it is reasonable to file its PTAM Attrition Factor at this time to enable the Company to offset the impact of inflation on its cost of service.

⁹ See D.25-06-052, Ordering Paragraph 1.b, p. 8.

¹⁰ D.23-12-016, Finding of Fact No. 5, p. 49.

¹¹ See D.25-06-052, Ordering Paragraph 1.b, p. 8.

For these reasons, PacifiCorp requests that the Commission grant this Petition to modify D.25-06-052 to allow the Company to file the Tier 2 Advice Letter implementing the 2025 PTAM Attrition Factor, for rates effective 30 days after the date it files the Tier 2 Advice Letter.

Respectfully submitted, December 15, 2025, at San Francisco, California

DOWNEY BRAND, LLP

By: */s/ Michael B. Day*
MICHAEL B. DAY
455 Market Street, Suite 1500
San Francisco, California 94105
Telephone: 415.848.4800
Facsimile: 415.848.4801
Email: mday@downeybrand.com

Attorneys for PacifiCorp

Attachment A:

Draft Tier 2 Advice Letter Implementing the Post-Test Year
Attrition Factor Mechanism for 2025

[Date Placeholder]

Via Electronic Filing

Advice Letter [Placeholder] (U 901-E)

California Public Utilities Commission
Energy Division
Tariff Unit, 4th Floor
505 Van Ness Avenue
San Francisco, CA 94102
Email: edtariffunit@cpuc.ca.gov

**RE: PacifiCorp (U 901-E) Advice Letter [Placeholder] in Compliance with Decision
[Placeholder]**

PURPOSE

PacifiCorp d/b/a Pacific Power (“PacifiCorp” or “Company”) submits Advice Letter [Placeholder] in compliance with Application 22-05-006, Decision (“D.”) [Placeholder] that allows PacifiCorp to file its Post-Test Year Attrition Mechanism (“PTAM”) Attrition Factor for 2025¹ as soon as feasible following the issuance of D.[Placeholder]. In D.[Placeholder], the Commission approved PacifiCorp’s Petition for Modification of D.25-06-052 addressing the date of PacifiCorp’s PTAM Attrition Factor filing for 2025.

The affected tariff sheets are attached as Attachment A and include:

Cal. P.U.C. Sheet No.	Title of Sheet No.	Canceling P.U.C. Sheet No.
-----------------------	--------------------	----------------------------

BACKGROUND

On May 5, 2022, PacifiCorp filed its Test Year 2023 General Rate Case (“GRC”) Application requesting authority to increase its rates for electric service in California beginning January 1, 2023, and for authorization to continue the PTAM and PTAM Attrition Factor adjustment.²

On December 15, 2023, the Commission addressed the PTAM and PTAM Attrition Factor in its

¹ Calendar year 2025.

² Use of the PTAM and PTAM Attrition Factor was first approved by the Commission in D.06-12-001, and has been subsequently authorized in D.09-04-017, D.10-09-10, D.12-10-006, D.13-07-026, D.15-06-018, D.15-12-018, D.16-09-046, D.20-02-025, D.21-01-006, and D.23-12-016.

Track 1 GRC Decision, D.23-12-016.³

On May 5, 2025, PacifiCorp filed its Petition for Modification of D.23-12-016, requesting a one-year extension on filing its Test Year 2026 GRC Application from May 2025 to May 2026. In addition to its extension request, PacifiCorp sought authorization to: (1) continue the use of the ECAC mechanism in 2025 and 2026; (2) submit PTAM filings in 2025 and 2026 to account for major capital additions and inflation; and (3) to continue the use of its PTAM Attrition Factor in 2025 and 2026.

On June 26, 2025, the Commission issued D.25-06-052, which approved PacifiCorp's May 5, 2025 Petition for Modification. The Commission authorized PacifiCorp to file its PTAM Attrition Factor for 2025 and 2026 on October 15 of each year, as a Tier 2 Advice Letter, with rates effective January 1 of the year following approval of PacifiCorp's request.

On December 15, 2025, PacifiCorp filed its Petition for Modification of D.25-06-052, requesting that the Commission amend D.25-06-052 as to allow the Company to file its Tier 2 Advice Letter implementing the PTAM Attrition Factor for 2025.

[Placeholder for discussion of Potential Decision approving the Petition for Modification of D.25-06-052]

DISCUSSION

In this advice letter filing, PacifiCorp requests authority to increase rates based on the PTAM Attrition Factor for 2025, effective [Placeholder Date], 2026. D.23.12-016 states "Continued use of the PTAM Attrition Factor is also authorized and must be calculated as the greater of (1) the September Global Insight U.S. Economic Outlook forecast of Consumer Price Index with an offsetting productivity factor of 0.5 percent, or (2) zero."⁴

The S&P Global Market Intelligence (formerly known as IHS Markit) September 2025 forecast of CPI for 2026 is 2.6 percent. Based on the CPI forecast for 2026 of 2.6 percent, less a productivity factor of 0.5 percent, the PTAM Attrition Factor for 2026 is 2.1 percent.

Application of the PTAM Attrition Factor for 2025 to current rates results in a proposed rate increase of approximately \$2.2 million or 1.2 percent overall. Exhibit B provides the effect of the proposed rate change by rate schedule. The proposed PTAM uses the same formula applied to the same rate elements as set forth in D.06-12-011, as amended by D.09-04-017. The proposed rate adjustments are calculated in accordance with the settlement agreement approved in D.06-12-011, section 2.3.2, which provides:

³ See D.23-12-016, Ordering Paragraph 5, p. 59.

⁴ *Id.* at p. 11.

“Any rate change under the PTAM shall be implemented by applying the overall PTAM percentage change as a uniform percentage change to all rate elements adjusted in PacifiCorp’s 2007 test year excluding Schedules S-99, S-100, S-191, and ECAC-94.”

For the rate change associated with the PTAM Attrition Factor for 2025, the overall PTAM percentage change has been applied to all rate element types that were adjusted in PacifiCorp’s last general rate case, A.22-05-006. Rate element types excluded from adjustment are rate elements that reflect external fees or are primarily dependent on changes to other rate elements. They include: generation franchise fees, Federal Energy Regulatory Commission transmission rates, metering and delivery discounts, reactive power charges, and the Energy Cost Adjustment Clause. Exhibit C shows the billing determinants and the present and proposed rates that result from this increase. The proposed increase would result in the following change by customer segment:

Customer Segment	Approx. Increase (\$)	Approx. Increase (%)
Residential Customers	\$1,159,562	1.2%
Commercial and Industrial Customers	\$750,610	1.2%
Irrigation Customers	\$236,412	1.1%
Lighting Customers	\$12,158	1.5%
Total	\$2,158,742	1.2%

The average residential customer using 850 kWh per month would see an increase of \$2.62 per month.

TIER DESIGNATION AND EFFECTIVE DATE

This Advice Letter is submitted as a Tier 2 in accordance with Industry Rule 5.2 (2) of General Order 96-B, which states: “A tariff change that is consistent with authority the Commission previously has granted to the Utility submitting the advice letter, such as a rate change within a price floor and ceiling previously approved by the Commission for that Utility.”

This tariff change seeks to comply with [Placeholder], which allows PacifiCorp to file a Tier 2 Advice Letter to implement the PTAM Attrition Factor for 2025 at any reasonable time after the issuance of [Placeholder]. PacifiCorp respectfully requests that this Advice Letter become effective within 30 days of the date of filing.

PROTEST

Any person wanting to protest this filing may do so by letter sent by U.S. Mail, by facsimile, or

electronically, any of which must be received no later than [Placeholder]. Protests should be mailed to:

CPUC Energy Division
Attention: Tariff Unit, 4th Floor
505 Van Ness Avenue
San Francisco, California 94102
Facsimile: (415) 703-2200
E-mail: edtariffunit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above. The protest should also be sent by U.S. mail (and by facsimile and electronically, if possible) to PacifiCorp at the address shown below on the same date it is mailed or delivered to the Commission.

Pooja Kishore
Regulatory Affairs Manager
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (503) 813-7314
E-mail: californiadockets@pacificorp.com
Pooja.kishore@pacificorp.com

Ajay Kumar
Chief Regulatory Counsel
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (503) 813-5161
E-mail: ajay.kumar@pacificorp.com

There are no restrictions on who may file a protest, but the protest must specifically set forth the grounds upon which it is based and be expeditiously submitted.

Additionally, PacifiCorp respectfully requests that all data requests regarding this matter be addressed to (with a copy to the Company's Counsel):

By E-mail: datarequest@pacificorp.com

NOTICE

In accordance with General Order (GO) 96-B, Section 4, a copy of this Advice Letter will be served electronically or by U.S. mail to parties shown on the GO 96-B service list, a copy of which is attached. A request for a change of address in the GO 96-B service list should be directed by electronic mail to Californiadockets@pacificorp.com. Advice letter filings may also be accessed electronically at: www.pacificpower.net/regulation.

Please direct any informal questions to Pooja Kishore at (503) 813-7314 at the telephone number or e-mail addresses shown above.

Sincerely,

Robert Meredith
Director, Regulation

DRAFT