

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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Application of PacifiCorp d/b/a Pacific  
Power (U 901 E) for Approval of Sale of  
Washington-Based Assets and  
Establishment of a Washington Asset  
Transfer Memorandum Account.

Application 26-04-005

**THE PUBLIC ADVOCATES OFFICE  
MOTION FOR PARTY STATUS**

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May 14, 2026

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Application of PacifiCorp d/b/a Pacific Power (U 901 E) for Approval of Sale of Washington-Based Assets and Establishment of a Washington Asset Transfer Memorandum Account.

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**I. INTRODUCTION**

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this motion for party status in the above-captioned proceeding pursuant to Rules 1.4(a)(4) and 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure.

**II. INTEREST IN THE PROCEEDING**

Cal Advocates has a statutory mandate to represent and advocate on behalf of the interests of public utility customers before the Commission.<sup>1</sup> Our mission is to obtain the lowest possible rates for service consistent with reliable and safe service levels, and the state's environmental goals.

In this proceeding PacifiCorp is asking the Commission to approve the sale of its Washington state based assets and its Washington service area to Gem Sub LLC, an operating affiliate of Portland General Electric Company (Service Area Transfer).<sup>2</sup> The Service Area Transfer involves the sale of generation assets, including the 477 MW Chehalis power plant, (2) 94 MW Goodnoe Hills Wind Farm, (3) 234 MW Marengo I

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<sup>1</sup> Public Utilities Code § 309.5.

<sup>2</sup> Application of PacifiCorp d/b/a Pacific Power (U 901 E) for Approval of Sale of Washington-Based Assets and Establishment of a Washington Asset Transfer Memorandum Account (Application), p. 2.

and II Wind Farms; transmission assets of (4) 393 miles of transmission lines, (5) 10 substations, (6) 6, 220 structures<sup>3</sup>; distribution assets of (7) 4,100 miles of distribution lines, (8) 34 substations, and (9) 100,480 poles.<sup>4</sup> PacifiCorp will also include the entire Washington service area, comprising 137,000 customers.<sup>5</sup>

The physical assets in the Service Area Transfer are necessary or useful in the performance of PacifiCorp's duties to the California public and the California allocated portions of the sale exceed \$5 million.<sup>6</sup> Pursuant to PUC §851, PacifiCorp is obligated to receive the Commission's approval prior to the sale. The Service Area Transfer is also subject to regulatory approvals from the Public Utility Commission of Oregon, the Washington Utilities and Transportation Commission, the Idaho Public Utilities Commission, the Public Service Commission of Utah, the Wyoming Public Service Commission, and the Federal Energy Regulatory Commission.<sup>7</sup>

The Service Area Transfer is valued at \$1.9 billion. The net book value is approximately \$1.36 billion, with \$504 million in goodwill value<sup>8</sup>, before closing costs.<sup>9</sup> PacifiCorp has designated California-allocated goodwill value for distribution to its California customers over a period of three years. PacifiCorp proposes a distribution regime of 68 percent to California ratepayers and 32 percent retained by PacifiCorp. This results in a \$1.6 million credit to PacifiCorp's California customers.<sup>10</sup> The company will implement these credits in a subsequent general rate case.<sup>11</sup>

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<sup>3</sup> Application, p. 3.

<sup>4</sup> Application, p. 3, 4.

<sup>5</sup> Application, p. 3.

<sup>6</sup> Application, p. 9.

<sup>7</sup> Application, p. 7, 8.

<sup>8</sup> Application, p. 5: The goodwill value is the amount received in excess of the fair market value of the assets sold in this transaction.

<sup>9</sup> Application, p. 5.

<sup>10</sup> Application, p. 5.

<sup>11</sup> Application, p. 12.

PacifiCorp asserts that the Service Area Transfer will not increase rates for its California customers.<sup>12</sup> The company also claims that the Service Area Transfer will help its ability to meet California’s climate goals. However, PacifiCorp admits that the sale of Goodnoe Hills and Marengo I and II Wind Farms may impact its renewables portfolio and its ability to address California’s climate goals. According to PacifiCorp however, it will allocate a larger portion of its renewable resources to meet California’s climate policies because the company will no longer be required to comply with Washington’s climate policies.<sup>13</sup>

Cal Advocates’ request for party status is consistent with its statutory mission, to obtain the lowest possible rates for service consistent with reliable and safe service levels.<sup>14</sup> The projected goodwill value, distribution regime, and PacifiCorp’s capacity to meet California’s climate policies will have an impact on utility customers that Cal Advocates represents. Cal Advocates intends to participate in this proceeding and will assess and comment on PacifiCorp’s requests.

### III. NOTICE

Service of notices, orders, pleadings, and correspondence should be directed to:

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<sup>12</sup> Application, p. 10.

<sup>13</sup> Application, p. 11, 12.

<sup>14</sup> Public Utilities Code § 309.5.

#### IV. CONCLUSION

For the reasons stated above, Cal Advocates respectfully requests that the Commission grant its motion for party status.

Respectfully submitted,

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