BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of PacifiCorp (U901E) for Approval of its 2027 Energy Cost Adjustment Clause and Greenhouse Gas-Related Forecast and Reconciliation of Costs and Revenue.	Application 26-08-001

PROTEST OF THE PUBLIC ADVOCATES OFFICE

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September 2, 2026

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Application of PacifiCorp (U901E) for Approval of its 2027 Energy Cost Adjustment Clause and Greenhouse Gas-Related Forecast and Reconciliation of Costs and Revenue.	Application 26-08-001

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I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby files its protest to the *Application of PacifiCorp for Approval of its 2027 Energy Cost Adjustment Clause (ECAC) and Greenhouse Gas (GHG) Related Forecast and Reconciliation of Costs and Revenue*, Application (A.) 26-08-001[1] in accordance with Rule 2.6(a)[2] of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure.

PacifiCorp requests that the Commission approve new rates and credits for the Company's (1) Schedule ECAC-94 Tariff Rate Rider; (2) Schedule GHG-92 Surcharge to Recover GHG Carbon Pollution Permit Costs; and (3) Schedule GHG-93 California Climate Credit (California Climate Credit). In addition, PacifiCorp discontinues allocations to the Solar Multifamily Affordable Housing (SOMAH) Program after June 2026. PacifiCorp proposes to return unused SOMAH funds to California customers through the 2027 California Climate Credit. Lastly, PacifiCorp proposes to set aside five percent of allowance revenue to be deposited in the State Transmission Accelerator Fund beginning July 1, 2026.

[1] A.26-08-001, *Application of PacifiCorp (U 901 E) for Approval of Its 2027 ECAC and GHG—Related Forecast and Reconciliation of Costs and Revenue* (Application) (August 3, 2026).

[2] Rule 2.6(a) provides that a protest to an application must be filed within 30 days of the date the notice of the filing of the application first appears in the Commission's Daily Calendar.

PacifiCorp requests a rate decrease of $27.2 million based on combined ECAC and GHG surcharge for rate effective January 1, 2027.

II. BACKGROUND

PacifiCorp seeks Commission approval to (1) decrease the Balancing Rate, (2) decrease the Offset Rate under its ECAC, (3) decrease the surcharge that recovers the costs for the procurement of GHG allowances for its retail compliance obligation (under California's Cap and Trade Program), and (4) update the California Climate Credit that returns revenue from the sale of GHG allowances to eligible customer classes.[3] PacifiCorp requests that these changes be effective January 1, 2027.[4] In addition, PacifiCorp will discontinue the set aside for SOMAH programs, refund amounts set aside in 2025 and 2026 for SOMAH programs, and begin set aside funds for the State Transmission Accelerator Program in 2026.[5]

PacifiCorp proposes an overall annual rate decrease of $27.2 million for the combined effect of the proposed changes in its ECAC rates and GHG cost recovery rates.[6] This decrease is due to a decrease in the ECAC Balancing Rate of approximately $14.2 million compared to current rates, a decrease to the ECAC Offset Rate of $8.2 million currently in rates, and a decrease in the GHG surcharge of approximately $4.8 million.[7]

III. ISSUES TO BE CONSIDERED

PacifiCorp's Application raises several issues that merit further investigation by the Commission. Accordingly, Cal Advocates is reviewing the application and conducting discovery to verify and assess PacifiCorp's request for approval to update its rates pursuant to its ECAC and GHG 2027 cost and revenue forecasts and to reconcile

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[3] Application at 2.

[4] Application at 2.

[5] Application at 2.

[6] Application at 2.

[7] Application at 2.

and set its California Climate Credit rates. Cal Advocates will also assess the potential impact of PacifiCorp's ECAC and GHG forecasts on the company's 47,000 electric customers in Del Norte, Modoc, Shasta, and Siskiyou counties in Northern California. In addition to PacifiCorp's proposed issues to be considered within the scope of this proceeding, as described in the Application, Part III (for "Description of PacifiCorp's Request"),[8] Cal Advocates has identified the following additional issues:

1) The reasonableness of the proposed annual overall revenue decrease of $27.2 million;[9]

2) The reasonableness of PacifiCorp's request to discontinue SOMAH after June 2026 and refund unused SOMAH program funds to California customers through the 2027 California Climate Credit;[10] and

3) The reasonableness of PacifiCorp's request to set aside funds for the State Transmission Accelerator Program.

4) The reasonableness of measuring the claimed $27.2 million rate decrease against the still-effective 2025 ECAC rates while the 2026 Balancing and Offset Rates remain pending, and whether the 2027 rates and rate-impact tables should be updated immediately upon a final decision in A.25-08-001;

5) The reasonableness of the underlying net power cost forecast inputs (including forward price curves, coal supply agreements, WRAP costs, and related modeling assumptions) and the prudency of the coal contracts supporting those forecasts;

6) The accuracy and compliance of the calculated unused SOMAH funds ($1,833,301.60) and the five-percent Transmission Accelerator Fund set-aside with the requirements of D.26-08-029 and D.26-04-036; and

7) The equitable allocation of the proposed rate decreases across customer classes and the specific impact on PacifiCorp's approximately 47,000 electric customers in Del Norte, Modoc, Shasta, and Siskiyou counties.

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[8] See, e.g., Application, Part III, "Description of PacifiCorp's Request," at 6-12.

[9] Application at 2.

[10] Application at 10-12.

This list is non-exhaustive; Cal Advocates reserves the right to raise other issues as more information becomes available.

IV. PROCEDURAL SCHEDULE AND NEED FOR HEARINGS

Cal Advocates is currently reviewing PacifiCorp's Application and conducting discovery. Although PacifiCorp's proposed schedule does not include a placeholder for evidentiary hearings, it is premature to conclude that evidentiary hearings will not be necessary.[11] Cal Advocates will be prepared to discuss the schedule for this proceeding at the pre-hearing conference (PHC).

V. CATEGORIZATION OF PROCEEDING

Cal Advocates agrees that this proceeding should be categorized as ratesetting.[12]

VI. CONCLUSION

Cal Advocates respectfully requests that this proceeding be categorized as ratesetting and that the scope of this proceeding includes the issues identified in this protest.

Respectfully submitted,

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[11] See Application at 14.

[12] See Application at 13.