



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: PacifiCorp (U 901-E)

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person: Pooja Kishore

Phone #: (503) 813-7314

E-mail: californiadockets@pacificorp.com

E-mail Disposition Notice to: Pooja.Kishore@pacificorp.com

EXPLANATION OF UTILITY TYPE

ELC = Electric
PLC = Pipeline

GAS = Gas
HEAT = Heat

WATER = Water

(Date Submitted / Received Stamp by CPUC)

January 16, 2026

Advice Letter (AL) #: 779-E

Tier Designation: 3

Subject of AL: Joint Small and Multi-Jurisdictional Investor-Owned Utilities (SMJUs) Advice Letter to Propose Heat Risk Protections

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
Decision 25-06-012

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/access to confidential information:

Resolution required? Yes No

Requested effective date: No. of tariff sheets:

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: Proposed adjustment to disconnection temperature threshold.

Pending advice letters that revise the same tariff sheets: N/A

Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Pooja Kishore
Title: Regulatory Affairs Manager
Utility/Entity Name: PacifiCorp

Telephone (xxx) xxx-xxxx: (503) 813-7314
Facsimile (xxx) xxx-xxxx:
Email: californiadockets@pacificorp.com

Contact Name: Jedediah Gibson
Title: Outside Counsel
Utility/Entity Name: Downey Brand LLP

Telephone (xxx) xxx-xxxx: (916) 520-5280
Facsimile (xxx) xxx-xxxx:
Email: jgibson@downeybrand.com

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

January 16, 2026

VIA EMAIL ONLY

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 No. 779-E
Alpine Natural Gas Operating Company No. 1, LLC (U 909-G) Advice Letter No 81-G
Bear Valley Electric Service, Inc. (U 913 E) Advice Letter No. 536-E
Liberty Utilities (CalPeco Electric) LLC (U 933 E) Advice Letter No. 282-E
Southwest Gas Corporation (U 905 G) Advice Letter No. 1363-G
West Coast Gas Company, Inc. (U 910 G) Advice Letter No. 709-G**

**Joint Small and Multi-Jurisdictional Investor-Owned Utilities (SMJUs) Advice
Letter to Propose Heat Risk Protections**

PURPOSE

Pursuant to Ordering Paragraph No. (OP) 5 of Decision (D.) 25-06-012, PacifiCorp d/b/a Pacific Power (PacifiCorp), on behalf of itself, Alpine Natural Gas Operating Company No. 1, LLC (Alpine), Bear Valley Electric Service, Inc. (BVES), Liberty Utilities (CalPeco Electric) LLC (Liberty), Southwest Gas Corporation (Southwest Gas), and West Coast Gas Company, Inc. (West Coast Gas) (collectively, the Small and Multi-Jurisdictional Utilities or SMJUs)¹ submits

¹ Although OP 5 of D.25-06-012 also names Alpine, Southwest Gas, and West Coast Gas (collectively, the Gas SMJUs), as gas utilities, the Gas SMJUs are effectively only subject to the current 32 ° Fahrenheit (F) cold weather protection threshold consistent with Conclusion of Law 8 of D.20-06-003. As recognized in D.20-06-003, given the nature of service provided by gas utilities, Large IOU gas utilities were only restricted from disconnecting residential customers based on minimum temperatures, when temperatures are expected to be below 32 degrees based on a 72-hour look-ahead period. (D.20-06-003, Conclusion of Law 8.) While gas is typically used for residential heating, it is not utilized for residential cooling.

this Tier 3 Advice Letter (AL) to propose an approach for adjusting the temperature thresholds that require halting disconnections, taking into account relative heat risks.

BACKGROUND

In Phase 1 of Rulemaking (R.) 18-07-005, the California Public Utilities Commission (CPUC or Commission) adopted statewide extreme weather disconnection protections. On June 16, 2020, the Commission issued D.20-06-003, which established certain disconnection protections for Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas) (collectively, the Large IOUs). When considering whether to extend similar protections to the SMJUs in D.22-08-037, the Commission noted that:

In light of the smaller ratepayer bases of SMJUs and limited staff resources dedicated to California operations, we are concerned that the administrative costs and burdens of [Large IOU disconnection] requirements may outweigh the direct benefits to customers at risk of disconnection.²

Given differences between the SMJUs and Large IOUs, many disconnection requirements adopted for the Large IOUs were not extended to the SMJUs. The Commission did, however, determine that certain temperature-based protections applicable to the Large IOUs should be extended to the SMJUs. Specifically, D.22-08-037 adopted disconnection protections specifying that residential electric customers may not be disconnected for non-payment when local temperatures above 100 °F or below 32 °F are forecast within a 72-hour look-ahead period.³ In adopting these protections, the Commission permitted each utility to use its own internal weather monitoring systems to meet the requirement.⁴

² D.22-08-037, p. 23.

³ *Id.*, Ordering Paragraph 3(e).

⁴ *Ibid.*

On August 14, 2024, in light of increasing heat waves, The Utility Reform Network (TURN) filed an emergency motion in R.18-07-005, urging the Commission to strengthen disconnection protections during “extreme heat” events. TURN argued that the existing 100 °F statewide threshold was too high and not tailored to local climate norms, leaving many customers unprotected during dangerous heat conditions.⁵ On October 14, 2024, the Commission issued a ruling denying TURN’s emergency motion. The ruling acknowledged TURN’s concerns but found that no emergency warranting immediate rule changes had been demonstrated.

On October 30, 2024, the Assigned Commissioner issued an Amended Phase 2 Scoping Memo and Ruling in R.18-07-005, expanding the proceeding’s scope to include “disconnection protections under extreme weather conditions.”⁶ The Amended Scoping Memo formally added TURN’s extreme heat issues to Phase 2 and set forth a process to develop the record.

On June 12, 2025, the Commission issued D.25-06-012, addressing, among other topics, the extreme heat protection proposals. In D.25-06-012, rather than immediately adopting specific temperature thresholds or specific heat risk measures, the Commission set in motion a collaborative process to refine the protections. The decision acknowledged that additional disconnection safeguards are needed for extreme heat events and directed the Large IOUs to develop those measures in coordination with interested parties. In accordance with OP 4 of D.25-06-012, on December 17, 2025, the Large IOUs jointly submitted a Tier 3 Advice Letter proposing adjusted “heat-triggered” disconnection thresholds.

⁵ Emergency Motion of the Utility Reform Network to Modify Weather-Related Disconnection Protections to Better Address “Extreme Heat” Health and Safety Risks, pp. 6-10 (Filed August 14, 2024).

⁶ Assigned Commissioner’s Amended Phase 2 Scoping Memo, p. 4 (Filed October 30, 2024).

OP 5 of D.25-06-012 directs the SMJUs to “jointly file a Tier 3 Advice Letter either adopting the Large IOUs’ proposal, proposing a modified version, or presenting an alternative proposal.” Based on that directive, the SMJUs hereby submit this Tier 3 Advice Letter proposing an alternative to the Large IOU proposal to most effectively safeguard SMJU customers from extreme heat events.

DISCUSSION

I. Current Extreme Weather Protections

D.22-08-037 prohibits the SMJUs from disconnecting residential customers when temperatures are forecasted to exceed 100 °F or drop below 32 °F based on a 72-hour look-ahead period.⁷ Utilities are permitted to rely on their own internal weather prediction systems for this determination. Each of the SMJUs implemented these weather protections according to their respective operational requirements and based on their own internal weather forecast systems and methodologies.

II. Evaluation of Large IOU Proposal

The SMJUs carefully considered the Large IOU proposal and concluded that the proposal is inappropriate and unworkable for the SMJUs. As described in greater detail below, the Large IOU proposal does not account for the small sizes and unique characteristics of the SMJUs and will not effectively protect SMJU customers from extreme heat events.

⁷ D.22-08-037, O 3(e).

A. The Large IOU Proposal Will be Challenging and Costly for the SMJUs to Implement.

1. Differences Between the SMJUs and Large IOUs Justify Different Proposals.

(a) Given the Small Sizes of the SMJUs, Their Customers Face Disproportionate Administrative Costs Compared to the Large IOUs.

Although the SMJUs are investor-owned utilities, they differ significantly from the Large IOUs. The SMJUs are substantially smaller than the Large IOUs, and administrative costs are a more significant and disproportionate burden for the SMJUs' smaller number of customers.

Indeed, with the exception of Southwest Gas which has approximately 206,000 customers, all of the SMJUs have 50,000 or fewer customers. Utility planning efforts, program implementation and administration, customer service, and customer connection and disconnection are conducted and handled by significantly smaller staff for the SMJUs than for the Large IOUs. For example, BVES currently has approximately 50 employees and approximately 24,900 customers, and Liberty has approximately 137 employees and approximately 50,000 customers. Compared to PG&E's approximately 28,000 employees for its 16 million customers,⁸ BVES and Liberty, respectively, have approximately 0.18% and 0.49% of the workforce to implement and administer any new disconnection requirements and 0.16% and 0.31% of the customer base from which to recover administrative costs associated with new disconnection requirements. While PacifiCorp has more employees, generally, its customers in California represent about two percent of its total customers from all six states PacifiCorp serves, and PacifiCorp employees dedicated to California are a similarly small percentage of PacifiCorp's workforce. PacifiCorp, with about 46,000 California customers, has approximately 0.29% of PG&E's customer base

⁸ These numbers are based on PG&E's 2025 Joint Proxy Statement, available at https://s1.q4cdn.com/880135780/files/doc_financials/2025/ar/2025-PG-E-Proxy-Statement.pdf.

from which to recover administrative costs. Imposing new or more onerous requirements for disconnection on PacifiCorp's very limited staff would be acutely challenging and costly for customers. With 1,272 customers, West Coast Gas has approximately 0.01% of PG&E's customer base from which to recover administrative costs.

The SMJUs provide cost-effective rates for their limited number of customers. However, in light of the limited number of SMJU staff and customers, any new disconnection requirements will disproportionately impact SMJU customer rates in comparison to the rate impacts for Large IOU customers. The SMJUs have, therefore, proposed an alternative to the Large IOU heat protection proposal that will be more simple to implement and administer, and that will minimize costs for the limited number of SMJU customers while providing effective protections from extreme heat events.

2. The Large IOU Proposal Is Inappropriate for the SMJUs.

(a) Given the Comparatively Small Service Territories of the SMJUs, There Is No Need to Incorporate Regional Differences.

Unlike the Large IOUs operating very large service territories that include significantly different climate zones, the SMJUs operate within much smaller regions of California with relatively uniform climatology.⁹ For example, BVES and Liberty operate at high elevations with relatively cooler temperatures and PacifiCorp's California service territory does not have differentiable "hot" climate zones. West Coast Gas' residential service territory is encapsulated in the decommissioned Mather Field Airforce Base boundaries with no differentiable climate zones. These distinctions obviate the need to establish different temperature thresholds for different regions within SMJU territories. Instead, and to simplify implementation and

⁹ For example, BVES' service territory is only approximately 32-square miles and West Coast Gas' service territory is only 0.53 square miles.

administration of SMJU disconnection protections, a uniform threshold should be applied to the SMJUs.

(b) The Large IOU Proposal Utilizes Inputs That Are Not Well Established and Will Be Costly and Challenging for the SMJUs to Implement.

The Large IOU Proposal utilizes the California-specific CalHeatScore, which is still in early stages of development. As noted by the Large IOUs, “the CalHeatScore tool, having launched only in May 2025, does not have historical data available for assessment and has not yet developed a system for automated data exchange, complicating its near-term integration into IOU billing systems.”¹⁰ The SMJUs have serious concerns about the CalHeatScore tool given that a fully-deployed data interchange system does not exist at this time and that the earliest one is not expected to be developed until the summer of 2026.¹¹ Even when a fully-deployed data interchange system is available, it will be challenging and costly for the SMJUs to update existing weather monitoring processes to incorporate CalHeatScore metrics. As noted by the Large IOUs:

[Even] [o]nce the [Application Programming Interface (API) for the CalHeatScore tool] is fully available and ready for production, the development and integration of CalHeatScore into utility operations necessitates additional time for billing system updates deployment, validation and testing, and staff training to promote accurate and consistent application.¹²

While these efforts “will take variable amounts of time” for the Large IOUs,¹³ for many of the same reasons, they will certainly take longer and be more burdensome for the more limited staff

¹⁰ SCE AL 5707-E, et al., p. 5.

¹¹ See SCE AL 5707-E, et al., pp. 7–8.

¹² SCE AL 5707-E, et al., p. 8.

¹³ *Id.*

of the SMJUs. Additionally, given the small customers bases of the SMJUs, the costs associated with these efforts will disproportionately impact SMJU customers compared to Large IOU customers.

Moreover, as described above, there is no need for the CalHeatScore's heat risk scores at the zip code aggregation level given the small sizes and more uniform climates of the SMJUs. Accordingly, the SMJUs have concluded that the costs to utilize CalHeatScore metrics will outweigh the benefits.

(c) Other Potential Inputs are Also Problematic.

Alternative inputs, like the National Weather Service (NWS) HeatRisk index that was recommended by TURN in its emergency motion,¹⁴ are also problematic. The HeatRisk index is based on a data source that is disclaimed on the NWS webpage as “experimental.”¹⁵ As noted by the Large IOUs, “original concerns about HeatRisk’s availability and reliability have not been resolved.”¹⁶ Indeed, the NWS caveats that “HeatRisk is an experimental product, which means that there is no guarantee of timely availability and changes may occur without advance notice.”¹⁷ NWS also notes that HeatRisk is not an official product, as “[t]he NWS’s heat watches, advisories, and warnings remain the official heat products from the NWS.”¹⁸ The SMJUs do not believe it is appropriate to utilize an unofficial experimental product that is subject to change without warning.

¹⁴ TURN Emergency Motion, pp. 10–12.

¹⁵ A banner on the NWS page states “**Experimental:** This page is experimental to provide a period of time for customers to provide feedback to NWS.” NWS HeatRisk, available at <https://www.wpc.ncep.noaa.gov/heatrisk/>.

¹⁶ SCE AL 5707-E et al., p. 5.

¹⁷ See “Overview” section of NWS HeatRisk webpage, available at <https://www.wpc.ncep.noaa.gov/heatrisk/>.

¹⁸ *Id.*

III. SMJU Proposal

For the reasons outlined above, the Large IOU proposal is unnecessarily complex and overly granular, challenging and costly to implement, and will not cost-effectively protect SMJU customers from extreme heat events. Accordingly, the SMJUs propose to adopt a simple and easily-implementable temperature threshold for use in restricting residential customer disconnections. Specifically, the SMJUs propose to modify the existing temperature-based disconnection protections established in D.22-08-037 by lowering the 100 °F threshold to 95 °F.

The SMJU proposal is consistent with California’s Division of Occupational Safety and Health (Cal/OSHA) thresholds. Cal/OSHA regulations identify 95 °F as an outdoor temperature to trigger “high heat procedures.”¹⁹ It is also consistent with Arizona requirements that restrict disconnecting customers when forecasted temperature exceeds 95 °F.²⁰ Furthermore, the SMJUs’ proposed 95 °F threshold is consistent with party recommendations from TURN,²¹ the Utility Consumers’ Action Network (UCAN),²² and the Center for Accessible Technology (CforAT) and National Consumer Law Center (NCLC).²³ Perhaps more importantly, however, the SMJU proposal to lower the existing temperature threshold can be easily implemented by

¹⁹ Cal. Code Regs., tit. 8, § 3395(e) outlines “high-heat procedures” and provides that “The employer shall implement high-heat procedures when the temperature equals or exceeds 95 degrees Fahrenheit.” and extends additional protections to employees employed in agriculture when “temperatures reach 95 degrees or above.”

²⁰ See Ariz. Admin. Code, § 14-2-2111 , available at https://apps.azsos.gov/public_services/Title_14/14-02.pdf.

²¹ See Attachment B-3 of SCE AL 5707-E, et al., October 20, 2025 Informal Feedback of TURN on IOU Proposal for Extreme Heat Disconnections Protections, pp. 1-2.

²² See Attachment B-4 of SCE AL 5707-E, et al., October 20, 2025 Informal Response of UCAN on Modifying Existing Temperature Thresholds for Disconnections Including the IOUs’ and TURN’s Proposals, p. 2.

²³ See Attachment C-1 of SCE AL 5707-E, et al., November 17, 2025 CforAT & NCLC Feedback on Extreme Heat Proposals from Extreme Weather Protections Working Group Meeting #3, pp. 1-2

leveraging processes already in place, minimizing costs for the limited number of SMJU customers. Moreover, adopting this lower threshold will increase customer protections without introducing unnecessary complexity or costs for the more limited number of SMJU customers.

COST RECOVERY

In accordance with D.25-06-012, Conclusion of Law 9, the SMJUs may record the incremental costs incurred to implement this decision in their disconnection memorandum accounts.

TIER DESIGNATION

In accordance with General Order 96-B and OP 5 of D.25-06-012, PacifiCorp submits this advice letter with a Tier 3 designation.

PROTESTS

To protest this filing, send a letter by U.S. mail, by facsimile, or electronically. Protests must be received by February 5, 2026, which is 20 days after the date of this filing. Protests should be sent to:

California Public Utilities Commission
Energy Division
Tariff Unit, 4th Floor
Email: edtariffunit@cpuc.ca.gov

The protest should also be sent by electronic mail to the SMJUs at the addresses shown below on the same date it is mailed or delivered to the Commission.

For PacifiCorp:
Pooja Kishore
Regulatory Affairs Manager
E-mail: californiadockets@pacificorp.com
Pooja.Kishore@pacificorp.com

For Alpine:
Michael Lamond
Administrator/CFO

Mike@alpinenaturalgas.com

For BVES:

Jenny Chen
Regulatory Affairs Manager
Jenny.Chen@gswater.com

For Liberty:

Elly O'Doherty
Manager, Rates and Regulatory Affairs
Elly.ODoherty@libertyutilities.com

For Southwest Gas:

Laurie Brown
Regulatory Manager/California
laurie.brown@swgas.com

For West Coast Gas:

Cynthia Morris
Administrator
westgas@aol.com

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

In addition, PacifiCorp respectfully requests that all data requests regarding this matter be addressed to:

By email (**preferred**): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

EFFECTIVE DATE

In accordance with General Order 96-B, this Tier 3 advice letter will become effective upon Commission Resolution.

NOTICE

In accordance with General Order 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 and the R.18-07-005 service list, a copy of which is attached. A request for 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, Regulatory Affairs Manager, at (503) 813-7314.

Sincerely,

/s/

Robert Meredith
Director, Regulation
PacifiCorp

cc: PacifiCorp General Order 96-B Service List
Alpine General Order 96-B Service List
BVES General Order 96-B Service List
Liberty General Order 96-B Service List
Southwest Gas General Order 96-B Service List
West Coast Gas General Order 96-B Service List
R.18-07-005 Service List