PACIFIC POWER
A DIVISION OF PACIFICORP

2025 Demand Response Annual Report Oregon

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TABLE OF CONTENTS

EXECUTIVE SUMMARY 4

DEMAND RESPONSE PORTFOLIO SUMMARY 4

- **Curtailment Events** 5
- **Customer Participation** 5
- **NEEA End Use Load Flex Project** 6

PACIFICORP DEMAND RESPONSE PROGRAMS 7

REGULATORY ACTIVITY 7

OREGON STAKEHOLDER ENGAGEMENT 8

IRRIGATION LOAD CONTROL 9

- **Program Description** 9
- **Participation** 10
- **Curtailment Events** 10
- **Customer Satisfaction** 10
- **Program Costs** 10
- **Cost Effectiveness** 11
- **Key Findings and Future Changes** 12

WATTSMART BUSINESS DEMAND RESPONSE 12

- **Program Description** 12
- **Participation** 13
- **Curtailment Events** 14
- **Customer Satisfaction** 15
- **Program Costs** 16
- **Cost Effectiveness** 16
- **Key Findings and Future Changes** 17

COOL KEEPER 18

- **Program Description** 18
- **Participation Targets** 18
- **Participant Experience** 18
- **Program Activity** 19
- **Cool Keeper Load Events** 19
- **Program Costs** 20
- **Cost Effectiveness** 20
- **Key Findings and Future Changes** 20

WATTSMART BATTERY PROGRAM 21

Program Description **21**
2025 Participation Targets and Enrollment **21**
Battery Program Events **22**
Program Costs **22**
Cost Effectiveness **22**
Key Findings and Future Changes **23**
COMMUNITY-BASED RENEWABLE ENERGY RESILIENCE HUB (CBRE-RH) PILOT 23
Pilot Description **23**
Program Costs **24**
Key Findings and Future Considerations **24**

EXECUTIVE SUMMARY

PacifiCorp's Oregon demand response (DR) portfolio is a core component of PacifiCorp's integrated resource strategy, designed to provide cost-effective, flexible capacity, enhance grid reliability, and support Oregon's clean energy and decarbonization goals. Authorized under Schedule 106 by the Oregon Public Utility Commission (OPUC), the portfolio currently includes residential, commercial and industrial (C&I), and agricultural (irrigation) programs, with continued expansion planned through the 2020s. Collectively, these programs enable customers to reduce or shift electricity usage during peak or system-constrained periods in exchange for financial incentives, avoiding higher-cost supply-side investments and reducing peak demand.

DEMAND RESPONSE PORTFOLIO SUMMARY

PacifiCorp Oregon DR offerings are structured to address different customer segments and operational needs:

Cool Keeper[1]: Cool Keeper is a direct load control program for residential-scale central cooling equipment. The Program installs load control switches on the compressor unit of residential and small commercial-size air-conditioning and heat pump systems, to enable aggregated use of this load for grid management.

Wattsmart Business Demand Response (WSB DR)[2]: PacifiCorp partners with third-party aggregators (notably Enel North America) to deliver Wattsmart Business Demand Response products that provide both economic and reliability value. These products offer multiple dispatch options (e.g., 60-minute, 7-minute, and real-time products), allowing large customers to earn performance-based incentive payments for curtailing load during system stress events. This segment represents a significant and highly dispatchable source of flexible capacity in the utility's Oregon service territory.

Irrigation Load Control[3]: Targeting agricultural customers, this long-standing program uses direct load control technologies to temporarily reduce irrigation pumping during peak periods. The irrigation program continues to deliver dependable summer peak reductions and remains an important seasonal resource for managing system constraints in rural areas.

Wattsmart Battery[4]: Wattsmart Battery is a customer-facing, incentive-based energy storage demand response program. The program enables PacifiCorp to aggregate customer-owned battery systems into a distributed energy resource (DER) network, functioning as a virtual power plant (VPP) that can be dispatched to address grid needs.

Community-Based Renewable Energy Resilience Hub (CBRE-RH) Pilot[5]: This pilot program supports Community-Based Renewable Energy (CBRE) projects in the State of Oregon through ongoing technical assistance to communities seeking to increase resiliency at facilities critical to community emergency management and disaster response. The pilot also provides support for the integration of battery storage systems of certain planned and existing CBRE projects, and matching funds for communities seeking external grant awards.

Demand response is a preferred resource in PacifiCorp's Oregon planning framework due to its low cost, fast deployment, and operational flexibility. DR helps defer or avoid new generation and transmission investments,

[1] https://www.pacificpower.net/savings-energy-choices/home/cool-keeper.html
[2] https://www.pacificpower.net/savings-energy-choices/business/CIDR.html
[3] https://www.pacificpower.net/savings-energy-choices/business/wattsmart-efficiency-incentives-oregon/oregon-agriculture/irrigation-load-control.html
[4] https://www.pacificpower.net/savings-energy-choices/wattsmart-battery-program.html
[5] https://www.pacificpower.net/community/oregon-clean-energy-plan/community-based-renewable-energy.html

reduces reliance on high-cost peaking resources, and enhances system resilience during extreme weather and high-load conditions.

PacifiCorp's DR portfolio directly supports Oregon's clean energy policies, including HB 2021, by enabling flexible load that complements variable renewable generation. PacifiCorp's long-term planning anticipates continued expansion of demand response capacity in Oregon, with DR playing a growing role alongside energy efficiency, storage, and renewable resources. Future program refinements are expected to focus on greater automation, equity-focused participation, and increased MW scale, positioning demand response as a foundational element of PacifiCorp's least-cost, least-risk resource mix.

By the end of 2025, PacifiCorp's Oregon demand response programs provided a total of 22.0 MW of available capacity at generation.

Table 1: 2025 Available Demand Response Capacity[6]

Program	MW at Site	MW at Generation
Irrigation Load Control	7.80	8.42
WSB DR	6.94	7.42
Cool Keeper	5.20	5.60
Wattsmart Battery	0.512	0.553
Total Portfolio	**20.45**	**22.00**

Curtailment Events

PacifiCorp utilized resources from all active demand response programs to support grid management operations throughout 2025.

Table 2: 2025 Demand Response Curtailment Activity by Program

Program	Number of Events	Average Duration of Events (Hour)	Average Curtailed Load per Event (MW at Site)
Irrigation Load Control	11	3.45	5.75
WSB DR	30	0.60	2.104
Cool Keeper	98	0.13	0.04
Wattsmart Battery	174	0.083	0.276
Total Portfolio[7]	**313**	**0.27**	**0.57**

Customer Participation

PacifiCorp's 2025 demand response portfolio provided participation opportunities across all major customer classes, including residential, commercial, industrial, and irrigation. Many participating customers enrolled in multiple meters or controllable devices within their respective programs.

[6] Total available demand response capacity is calculated as the aggregate of the curtailable capacity contributed by each program participant, based on the specific requirements and operating parameters of each program at year-end. Because these contributions vary by participant and program conditions, not all capacity is always available.

[7] The total portfolio average duration of events and the total average curtailed load per event are weighted based on the number of events within each program.

Table 3: 2025 Year-End Participation by Program

Program	Number of Customers	Number of Controlled Loads Enrolled[8]
Irrigation Load Control	141	457
WSB DR	23	50
*Real Time**	*1*	*1*
*60 Minute**	*20*	*47*
*7 Minute**	*2*	*2*
Cool Keeper	2,593	2,639
Wattsmart Battery	45	45
Total Portfolio	**2,802**	**3,191**

**Italicized line-items are individual product offerings of the Wattsmart Business Demand Response (WSB DR) program*

Table 4: 2025 Demand Response Program Costs

Program	Incentives	Delivery	Internal Costs	Marketing Costs	Total Annual Program Cost
Irrigation Load Control	$271,797	$614,903	$22,616	$0	$909,316
WSB DR	$64,668 [9]	$9,671	$33,709	$0	$108,048
Cool Keeper	$1,672	$1,239,165	$49,290	$0	$1,290,278
Wattsmart Battery	$207,000	$16,551	$45,006	$6,830	$275,387
NEEA EULF	$0	$182,350	$59	$0	$182,409
Optimal Time Rewards[10]	$76,625	$0	$146,521	$0	$223,146
Total Portfolio	**$621,762**	**$2,062,640**	**$297,201**	**$6,830**	**$2,988,584**

NEEA End Use Load Flex Project

PacifiCorp was one of 10 utility funders and a member of the steering committee for the NEEA End Use Load Flex (EULF) project. NEEA is a utility alliance that supports market development for energy efficiency and demand response-capable technology. The EULF is a NEEA initiative to organize regional utilities, identify common obstacles to the growth of demand response resources, and explore opportunities for NEEA to support accelerated growth of demand response in the Pacific Northwest.

2025 marked the second and final year of the project. In 2025, NEEA completed the following tasks:

- Completed several studies related to using domestic hot water heaters for demand response, including a pilot study of a self-install program design for CTA-2045 modules and lab study of demand response capability of different make and models of water heaters using CTA-2045 modules.
- Completed lab studies on the demand response capability of multi-family baseboard thermostats, multifamily central hot water, and variable speed heat pumps.
- Assess cybersecurity risk of different connection pathways.

[8] In the ILC and Cool Keeper programs, a unique controlled load refers to a single load control device. In the WSB DR program, each meter site is considered a unique controlled load. In the Wattsmart Battery program, each battery is a unique controlled load.

[9] Enel X may pay customers more in incentives than Pacific Power reimburses because Enel X bears performance and portfolio risk under the program design. Pacific Power reimburses only for verified, eligible demand response performance, while Enel X may voluntarily pay customers above that amount to support recruitment, retention, or contractual commitments. In 2025 Enel X paid customers ~$100,000 in incentives, PacifiCorp only reimbursed $34k.

[10] Optimal Time Rewards was cancelled on Nov. 15, 2024. 2025 costs for this program were related to program close-out, which included fulfilling a backlog of enrollment incentives from the previous year. There was no capacity associated with the Optimal Time Rewards program in 2025.

- Developed strategic and business plan for a follow-on four-year plan.

PACIFICORP DEMAND RESPONSE PROGRAMS

PacifiCorp launched a portfolio of demand response resources, beginning in 2022, in accordance with the findings of the Company's 2021 IRP, and in anticipation of PacifiCorp's initial Clean Energy Plan, filed in 2023.[11] Through 2025, the Company has launched the following programs under Schedule 106:

- **Irrigation Load Control (ILC):** Filed on March 28, 2022, in Docket ADV 1383, and became effective May 5, 2022.[12] The program began recruiting participants in January 2023.
- **Wattsmart Business Demand Response (WSB DR):** Filed on October 14, 2022, in Docket ADV 1436, and was approved November 15, 2022.[13] The program began recruiting participants in February 2023. The program was originally called the Commercial & Industrial Demand Response program but has since been rebranded as the Wattsmart Business Demand Response program (WSB DR). The 20-minute product was cancelled in December of 2024.
- **Cool Keeper:** Filed on February 18, 2025, in Docket ADV 1708. The program began recruiting customers for a limited/soft outreach in early July 2025, active recruitment for the program began September 2025, with expanded recruitment in mid-to-late September 2025.[14]
- **Wattsmart Battery:** Filed on December 20, 2024, in Docket ADV 1691. The program began recruiting customers in mid-June 2025.[15]

REGULATORY ACTIVITY

In 2025, PacifiCorp's Oregon demand response regulatory activity was primarily focused on the approval of new programs for the portfolio but also included compliance reporting and contributions to the Company's Clean Energy Plan (CEP).

- **December 20, 2024 –** PacifiCorp filed for approval of the Company's proposed Wattsmart Battery program, using the provisions of its existing demand response tariff (Schedule 106). Joint public comments were filed by Sierra Club, the Oregon Citizen's Utility Board (CUB), and the Oregon Solar + Storage Industries Association (OSSIA) on January 30, 2025, in support of the proposal with recommendations for program implementation. PacifiCorp's proposal was approved by the Commission on February 18, 2025, via the consent agenda (Docket ADV 1691).[16]
- **February 18, 2025 –** PacifiCorp filed for approval of the Company's proposed Cool Keeper (residential air conditioning demand response) program, using the provisions of its existing demand response tariff (Schedule 106). On March 20, 2025, the Oregon Public Utility Commission (OPUC) approved the Cool Keeper program, finding the program to be consistent with prior demand response program approval criteria related to cost recovery, rate impacts, reporting, and system benefits (Docket ADV 1708).[17]
- **March 28, 2025 –** PacifiCorp filed its 2024 Demand Response Annual Report, providing updates on the demand response programs authorized under Schedule 106, including: Irrigation Load Control Program,

[11] https://www.pacificpower.net/community/oregon-clean-energy-plan.html
[12] https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23237
[13] https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23503
[14] https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=24446
[15] https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=24367
[16] https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=24367
[17] https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=24446

Commercial and Industrial Demand Response Program, and Residential Demand Response Program (Docket ADV 1383).[18]

- **June 30, 2025 –** PacifiCorp filed its 2025 Oregon Clean Energy Plan (CEP) with the OPUC. CEP identified demand response as a key clean energy and grid reliability resource and included Oregon-specific demand response capacity targets for the near- and long-term planning horizons. The Commission acknowledged these targets on February 24, 2026, in Order 26-054 (Docket LC 85).[19]

OREGON STAKEHOLDER ENGAGEMENT

- **January 16, 2025 – Community Benefits and Impacts Advisory Group (CBIAG):** PacifiCorp convened for a dedicated Demand Response Workshop during this CBIAG meeting, which included a review of the Company's demand response portfolio of programs, 2025 program changes, analysis of 2024 post-meeting survey results, a 2025 forecast, and an engagement and filing roadmap.[20]
- **January 31, 2025 – Tribal Nations Community Benefits and Impacts Advisory Group (TN-CBIAG):** PacifiCorp presented Demand Response Workshop during this TN-CBIAG meeting, providing a general overview of demand response, the PacifiCorp portfolio of demand response programs and program changes for 2025, a 2025 forecast, and upcoming engagement opportunities.[21]
- **March 20, 2025 – Community Benefits and Impacts Advisory Group (CBIAG):** PacifiCorp presented on the Company's Community-Based Renewable Energy Resiliency Hub (CBRE-RH) pilot program, providing an overview of community-based renewable energy, components and aims of the CBRE-RH pilot, CBRE-RH pilot outreach updates, and a discussion of received stakeholder feedback.[22]
- **March 28, 2025 – Tribal Nations Community Benefits and Impacts Advisory Group (TN-CBIAG):** PacifiCorp presented on the Company's Community-Based Renewable Energy Resiliency Hub (CBRE-RH) pilot program, providing an overview of community-based renewable energy, components and aims of the CBRE-RH pilot, CBRE-RH pilot outreach updates, and a discussion of received stakeholder feedback.[23]
- **July 17, 2025 – Community Benefits and Impacts Advisory Group (CBIAG):** PacifiCorp provided updates on the demand response forecast for 2025-2027 included in the CEP filed June 30, 2025, in Docket LC 85, as well as updates on the program launches of Cool Keeper and Wattsmart Battery.[24]
- **December 18, 2025 – Community Benefits and Impacts Advisory Group (CBIAG):** PacifiCorp presented a review of the demand response portfolio results for 2024, proposed program changes for 2025 for discussion with stakeholders, and reviewed upcoming opportunities for review and stakeholder input.[25]
- **December 19, 2025 – Tribal Nations Community Benefits and Impacts Advisory Group (TN-CBIAG):** PacifiCorp presented a review of the demand response portfolio results for 2024, proposed program

[18] https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23237
[19] https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=24492
[20] https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/or-cbiag/CBIAG_Meeting_2025-01_January_Slides.pdf
[21] https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/tribal-relations/Oregon_CEP_Tribal_2025-01_January_Slides.pdf
[22] https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/or-cbiag/OR_CBIAG_Meeting_2025-03_March_Slides.pdf
[23] https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/tribal-relations/Oregon_CEP_Tribal_2025-03_March_Slides.pdf
[24] https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/or-cbiag/OR_CBIAG_Meeting_2025-07_July_Slides.pdf
[25] https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/or-cbiag/OR_CBIAG_Meeting_2025-12_December_Slides.pdf

changes for 2025 for discussion with stakeholders, and reviewed upcoming opportunities for review and stakeholder input.[26]

In addition to the specific stakeholder engagement meetings listed above, PacifiCorp also regularly met with Staff from the Oregon Public Utilities Commission (OPUC) throughout 2025 to discuss demand response program developments and to receive feedback and insights in adaptively managing the Company's demand response portfolio of programs.

IRRIGATION LOAD CONTROL

Program Description

PacifiCorp's Irrigation Load Control (ILC) Program is a demand response initiative designed to reduce peak electricity demand during critical summer periods while providing meaningful bill credits to participating agricultural customers in Oregon. The program enables the utility to maintain system reliability and avoid higher-cost capacity investments, while offering irrigators a flexible, incentive-based opportunity to lower operating costs.[27]

The ILC Program supports PacifiCorp's broader demand response portfolio authorized under Schedule 106 and aligns with the company's Integrated Resource Plan (IRP) by delivering dispatchable peak-load reductions from the agricultural sector. By temporarily curtailing irrigation pumping during periods of high system demand, the program helps mitigate peak stress on the grid, reduce reliance on expensive peaking resources, and improve overall system reliability in Oregon.

Eligible participants, including PacifiCorp's agricultural customers, served under Schedule 41 or Schedule 48 with irrigation pumps generally twenty-five horsepower or greater. During the irrigation season—typically June through mid-August for mandatory events, with voluntary events extending later into September—PacifiCorp may dispatch load control events on weekdays between 2:00 p.m. and 9:00 p.m. Pacific Time. Events are limited in frequency and duration, with advance notification provided to allow customers to plan operations.[28]

Load reductions are automated through control and monitoring equipment installed and operated by PacifiCorp's implementation partner, Connected Energy®, minimizing operational burden on customers. Participants retain the ability to opt out of individual events if operational conditions require continued irrigation.

Participants earn seasonal bill credits based on the average kilowatt load they can reliably curtail during program hours and their level of participation in dispatched events. Incentive rates can reach approximately $45 per kilowatt, with additional bonus incentives available for customers who participate in all mandatory events during a season. These credits are applied directly to customers' electric bills, providing predictable and transparent financial benefits.

The Oregon Irrigation Load Control Program represents a practical, collaborative approach to peak demand management in a state with significant agricultural load. It balances grid reliability, customer choice, and economic incentives, while supporting Oregon's broader energy planning and demand-side management objectives. As PacifiCorp continues to expand and refine its demand response portfolio, the ILC Program remains a key agricultural resource contributing to system flexibility and customer value.

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[26] https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/tribal-relations/OR_CEP_Tribal_2025-12_December_Slides.pdf

[27] https://www.pacificpower.net/savings-energy-choices/business/wattsmart-efficiency-incentives-oregon/oregon-agriculture/irrigation-load-control.html

[28] See Appendix 1 for detailed Irrigation Load Control Administration Report

Participation

During the 2025 operating season, 141 customers, representing 457 pumps, were actively enrolled in the program. Over the course of the season, the maximum load available for curtailment was 9.6 MW, with an average available curtailment capacity of 7.8 MW. The average curtailed load achieved during curtailment events was 5.75 MW.

Table 5: 2025 ILC Enrollment (Year-End)

Advanced Notice Period	Participating Devices at End of Season	Capacity (MW @ site)[29]
4 Hours	457	7.8

Curtailment Events

Table 6: 2025 ILC Curtailment Events

Date	Event Start	Event Length (Hours)	Baseline Load (MW at site)	Curtailed Load (MW at site)	Performance
7/11/25	17:00	3	7.2	6.4	90%
7/14/25	15:00	4	8.3	7.2	87%
7/15/25	15:00	4	8.7	6.7	76%
7/17/25	15:00	3	8.1	6.9	85%
7/28/25	17:00	4	7.0	5.8	82%
7/30/25	16:00	4	6.6	5.9	89%
8/5/25	17:00	3	6.2	5.2	85%
8/11/25	17:00	3	6.3	5.4	86%
8/12/25	17:00	3	6.4	5.5	86%
8/13/25	18:00	3	5.5	4.6	84%
9/2/25	16:00	4	6.5	3.7	56%

Customer Satisfaction

Overall, program participants indicated throughout the 2025 season that while pumping curtailment was acceptable, program participation remained secondary to meeting crop irrigation needs and complying with irrigation district requirements. PacifiCorp will continue to coordinate with Connected Energy and participating customers to further evaluate participant irrigation needs, irrigation district constraints, and opportunities to improve the ease of participation and opt-out processes associated with ILC events.

Program Costs

These costs include participant incentives, program delivery costs, and PacifiCorp internal costs. Participant incentives were provided to customers in the form of bill credits. Program delivery costs encompassed control of equipment and installation, administrative fees paid to Connected Energy, and marketing expenses. PacifiCorp internal costs consisted of labor and material expenses directly attributable to program operations.

[29] Capacity is calculated using the seasonal average of daily max loads available.

Table 7: 2025 ILC Program Costs

Category	Cost
Incentives	$271,797
Delivery	$614,903
PacifiCorp Internal Costs	$22,616
Total	**$909,316**

Connected Energy, the program administrator, is responsible for the procurement, installation, and ongoing maintenance of load control devices**.** In 2025, the total cost to procure and install these devices was $258,369, representing approximately 28% of total program costs for the year. The full cost of each device and its installation is incurred in the year of installation; however, the associated capacity benefits continue to accrue in subsequent years.

Cost Effectiveness

PacifiCorp applied the discount factors specified in the California Public Utilities Commission Demand Response Cost-Effectiveness Framework ("Framework") in evaluating program cost effectiveness. Cost-effectiveness was assessed at the program level. Program benefits were calculated using a 10-year levelized estimate of avoided costs by benefit category. Capacity values per dispatch were based on the maximum load reduction achieved across all 2025 events for each program tier and were adjusted to account for line losses.

Consistent with the 2024 Annual Report and following an evaluation of the applicable business rules and administrative complexity associated with registering demand response resources in the California Independent System Operator (CAISO) Energy Imbalance Market (EIM), PacifiCorp elected not to pursue EIM registration in 2023. Accordingly, CAISO EIM reserve value benefits remain excluded from the 2025 cost-effectiveness analysis for both the hour-ahead and day-ahead product offerings.

Participant costs reflect the value of foregone service, transaction costs, incremental management effort, and other costs participants may incur as a result of program enrollment and participation. These costs vary across participants and are not directly observable or readily quantifiable. However, participant willingness to enroll in the program provides evidence that such costs are less than the direct benefits received. Consistent with the Framework and with assumptions adopted by the Northwest Power Planning and Conservation Council, PacifiCorp modeled participant costs as 75 percent of participant incentives, as reflected in the PacifiCorp Total Resource Cost (PTRC) Test. The PTRC Test, but not the Utility Cost Test (UCT), incorporates the 10 percent Northwest Power Act conservation adder applied to avoided costs.

Program cost effectiveness is expected to improve over time, as the primary capital and labor costs associated with load control device installation are incurred on a one-time basis for each device. In future program years, PacifiCorp expects that a substantial portion of participating devices will have been installed in prior years, such that capacity benefits will continue to accrue without incurring corresponding installation costs.

Table 8: 2025 ILC Retrospective Cost Effectiveness for 2025 Program Year[30]

Parameter	2025
Curtailed Load (MW)[31]	7.2
Per-Unit Avoided Cost Rate ($/kW)	$101.25
Program Costs (excluding incentives)	$637,519
Participant Costs for PTRC	$841,366
Utility Cost Test (UCT)[32]	**0.93**
Total Resource Cost Test (TRC) (1)	**1.11**
Total Resource Cost Test (TRC) (2)[33]	**1.10**

Key Findings and Future Changes

1. **Program Scale and Grid Value**
   - The Oregon ILC program provided 7.8 MW of available load reduction at the customer site and 8.4 MW at generation by the end of the 2025 season, making It one of PacifiCorp's most impactful demand response resources in Oregon.
   - ILC represented over one-third of total demand response capacity in PacifiCorp's Oregon portfolio in 2025, underscoring irrigation load as a critical summer peak resource.
2. **Event Performance and Reliability**
   - 11 curtailment events were dispatched to irrigation participants during the 2025 season, with:
     - Average event duration: 3.45 hours
     - Average curtailment per event: 5.75 MW at site
   - Event frequency and duration remained within program design limits, supporting high operational reliability while minimizing disruption to agricultural operations.

No modifications to the program are anticipated for the 2026 season.

WATTSMART BUSINESS DEMAND RESPONSE

Program Description

The Wattsmart Business Demand Response (WSB DR) program provided incentives to participating commercial and industrial customers who agreed to curtail electrical load at PacifiCorp's request under defined dispatch parameters. PacifiCorp contracted with Enel X to administer the program, including customer enrollment, dispatch notifications, and event activation on PacifiCorp's behalf.

Participants could choose from three program products, each differentiated by the amount of advance notice provided prior to a dispatch event. Table 9 summarizes the features of these three product offerings.[34]

[30] See Appendix 3 for detailed cost-effectiveness results.
[31] Maximum achieved load reduction across all events in 2025 at site.
[32] The program passes the PTRC due to inclusion of broader system benefits but fails the UCT as utility-incurred costs exceed utility-quantified avoided cost benefits.

[33] TRC (2) Removes the value of lost service.
[34] For a more detailed description of the program activities and events in 2025, see the Wattsmart Business Demand Response Program – Administrator Report, in Appendix 2.

Table 9: WSB DR Product Offers Available in 2025

Dispatch Parameter	Products		
	60 Minute	7 Minute	Real Time
Eligible Period	May 1 – Sept 30	Jan 1 – Dec 31	Jan 1 – Dec 31
Eligible Days	Weekdays, non-holidays	7 days a week	7 days a week
Eligible Hours	3:00 pm to 9:00 pm	24 hours/day	24 hours/day
Max Dispatch Hours/Yr	40 hours	60 hours	5 hours
Max Dispatch Events	1 event/day	25 events/year	50 events/year
Max Durations	~ 3 hours	~4 hours	~15 minutes
Min Advance Notification to Cust	60 minutes	7 minutes	None
Incentive Rate ($/kW-yr)	$30	$75	$85

Participation

As of 2025 season, 23 customers with 50 sites representing approximately 8 MW of average capacity were fully enrolled and available for dispatch. Program enrollment during the reporting period included customers across a diverse range of industries, including Manufacturing (19), Education (6), Government (1), Energy and Utilities (5), Retail (3), Grocery Wholesale (3), Transportation and Storage (1), Business and Consumer Services (1), Wholesale and Distribution (3), Real Estate and Construction (1) and Other Industries (7).

Table 10: Participation by Customers and Capacity

	PAC 60M	PAC 7M	PAC RT	Total
Number of Customers[35]	20	2	1	**23**
Number of Sites	47	2	1	**50**
MWs Capacity[36]	5.87	0.177	2.10	**8.15**

[35] Several customers had multiple sites enrolled.

[36] The total average duration of events and the total average curtailed load per event are weighted based on the number of events within the program.

Curtailment Events

Table 11: 2025 WSB Curtailment Events, 60 Minute Product[37]

Date	Event Start	Event Length (Hours)	Nominated Load (MW @ site)	Curtailed Load (MW @ site)	Performance
5/27/25	17:00	1	5.565	2.569	46%
6/25/25	19:00	1	5.915	4.395	74%
7/14/25	17:00	3	10.969	5.893	54%
7/16/25	16:00	2	11.869	9.044	76%
8/5/25	18:00	3	11.874	6.282	53%
8/11/25	17:00	3	10.974	7.379	67%
8/12/25	17:00	3	11.874	7.760	65%
8/13/25	18:00	3	11.874	4.975	42%
08/22/25	18:00	3	11.874	6.917	58%
09/02/25	17:00	3	5.850	3.488	60%

Table 12: 2025 WSB Curtailment Events, 7 Minute Product

Date	Event Start	Event Length (Hours)	Nominated Load (MW @ site)	Curtailed Load (MW @ site)	Performance
1/21/25	09:00	0.33	0.39	0.247	63%
5/27/25	13:07	0.33	0.35	0.023	7%
6/25/25	12:57	0.33	0.35	0.15	43%
7/14/25	18:00	0.75	0.1	0.011	11%
7/15/25	18:00	0.75	0.1	0.071	71%
7/24/25	00:24	0.33	0.1	0.058	58%
9/04/25	06:42	0.33	0.07	0.079	113%
10/27/25	07:40	0.33	0.17	0.468	275%
11/21/25	0:02	0.33	0.17	0.474	279%
12/22/25	06:14	0.33	0.07	0.187	267%

During the 2025 season, a single customer participating in real-time events also dual-enrolled in the PAC 7M product -time events.

[37] For a more detailed description of the program activities and events in 2025, see the 2025 Wattsmart Business Demand Response Program Administrator report in Appendix 2.

Table 13: 2025 WSB DR Curtailment Events, Real Time

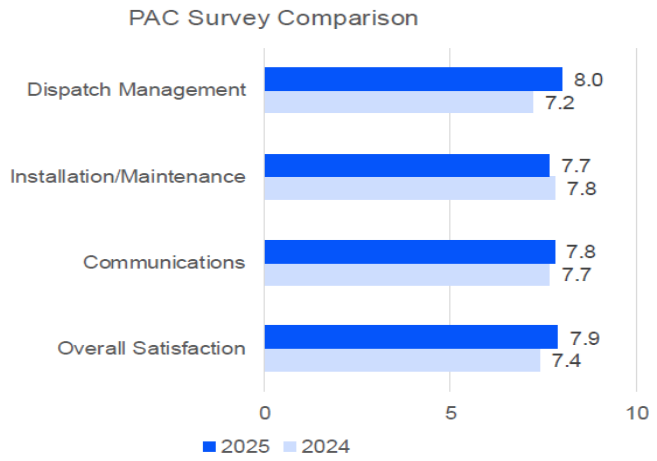
Date	Event Start	Event Length (Hours)	Nominated Load (MW @ site)	Curtailed Load (MW @ site)	Performance
1/7/2025	13:54	0.083	0.39	0.34	87%
1/12/2025	18:57	0.083	0.39	0.324	83%
1/22/2025	11:52	0.083	0.39	0.324	83%
1/30/2025	20:15	0.083	0.39	0.371	95%
2/2/2025	09:01	0.083	0.39	0.209	54%
2/3/2025	21:13	0.083	0.39	0.247	63%
2/4/2025	15:48	0.083	0.39	0.17	44%
2/5/2025	11:55	0.083	0.39	0.209	54%
2/6/2025	23:23	0.083	0.39	0.232	59%
2/7/2025	11:00	0.083	0.39	0.224	57%
12/2/2025	09:15	0.083			
12/3/2025	09:12	0.083			
12/4/2025	21:00	0.083			
12/6/2025	17:05	0.083			
12/11/2025	01:13	0.083			
12/11/2025	07:43	0.083			
12/11/2025	10:23	0.083			
12/12/2025	10:00	0.083			
12/13/2025	10:25	0.083			
12/16/2025	11:52	0.083			
12/17/2025	07:00	0.083			
12/17/2025	14:38	0.083			
12/19/2025	18:18	0.083			
12/20/2025	07:35	0.083			
12/22/2025	06:47	0.083			
12/23/2025	02:18	0.083			
12/31/2025	13:39	0.083			

**The one real time customer was unenrolled after February due to site construction affecting metering.*

Customer Satisfaction

The program administrator surveyed all active customers in October and November 2025, Satisfaction ratings across all categories are presented in Figure 1. Due to the limited number of respondents, results reflect combined feedback from both Oregon and Washington participants. Overall program satisfaction was rated at 7.9 out of 10.

Figure 1: Customer Survey Results for both Oregon and Washington



Program Costs

Table 14: 2025 WSB DR 2025 Program Costs

Category	Amount
Incentives[38]	$64,668
Delivery	$9,671
PacifiCorp Internal Costs	$33,709
Total Cost	**$108,048**

As designed, incentives represented the largest cost category in 2025. Because the program is currently focused on enrolling new customers, metering costs remain higher during growth years. In future years, the proportion of total costs attributable to meter upgrades is expected to decline, while incentive and delivery costs are projected to increase as overall program capacity expands.

Cost Effectiveness

For the retrospective cost-effectiveness analysis of the 2025 program year, PacifiCorp evaluated the cost effectiveness of each product with enrolled capacity in 2025, as well as the program in aggregate. Consistent with its approach for other demand response programs, PacifiCorp applied the California Standard Practice Manual framework as a guide in conducting the retrospective analysis.

Capacity values per dispatch were based on the 2025 maximum event load reduction by program category and were adjusted for line losses. Program benefits were calculated using a 10-year levelized benefit stream. A discussion of the cost components and the two cost-effectiveness tests applied is provided above in the Irrigation Load Control: Cost Effectiveness section.

The value of reserve capacity was excluded from the analysis for the peak shaving and real-time product offerings over the 10-year period, as well as for the 7-Minute product in the near term. In addition, there was no participation in the real-time product offering in Washington in 2025.

[38] Enel X may pay customers more in incentives than Pacific Power reimburses because Enel X bears performance and portfolio risk under the program design. Pacific Power reimburses only for verified, eligible demand response performance, while Enel X may voluntarily pay customers above that amount to support recruitment, retention, or contractual commitments. In 2025 Enel X paid customers ~$100,000 in incentives, PacifiCorp only reimbursed $34k.

Detailed cost-effectiveness results for the 2025 program year are presented in Table 15.

Table 15: 2025 WSB DR Retrospective Cost Effectiveness[39]

Parameter	2025
Curtailed Load (MW)[40]	9.89
Per-Unit Avoided Cost Rate ($/kW)	$84.16
Incentives	$64,668
Delivery and Meter Upgrades	$9,671
PacifiCorp Internal Costs	$33,709
Participant Costs for TRC (Test 1)	$91,881
Participant Costs for TRC (Test 2)[41]	$75,714
Utility Cost Test (UCT)	**5.78**
Total Resource Cost Test (TRC) (1)	**7.48**
Total Resource Cost Test (TRC) (2)	**8.25**

Key Findings and Future Changes

Key Findings

2025 was a year of mixed results for the Pacific Power Wattsmart Business Demand Response program. The highlight was the PAC 7M and PAC RT programs maturing into reliable, consistent products to support the Pacific Power service territory. This year of experience resulted in a strong next step to building demand response capacity in the C&I sector.

Customer feedback collected through the 2025 satisfaction survey indicates the overall satisfaction with the program was 7.9 out of 10. Satisfactions ratings improved in three of the four categories, with the biggest improvement being in Dispatch Management, which is due to the removal of the PAC 20M product. The PAC 60M, PAC 7M and PAC RT product uses are more distinct, and PacifiCorp's activation of these products is consistent.

Future Changes for 2026

Based on 2025 performance results and customer feedback, PacifiCorp will implement several changes to improve program effectiveness in 2026:

1. **Leverage high performing customers in all three products to accelerate program growth.** The existing customers are reliable and after two full years of the program, can serve as the portfolio foundation and can be used to create repeated success with new customers.
2. **Grow the PAC 7M program enrollment and improve existing customer performance.** Reinvigorate customer communications.
3. **Continuing to strengthen communication channels with customers**. Use platform engagement, customer support, and account management; the more interactions with customers early in their demand response experience the better.

[39] See Appendix 3 for detailed cost-effectiveness results.
[40] Maximum achieved load reduction across all events in 2025, at site.
[41] Removes the estimated value of lost service.

3. **Portfolio Growth and Targeted Recruitment.** Efforts will continue to focus on expanding participation among customers with automation capabilities and operational flexibility to increase portfolio size and overall program impact.
4. **Customer Engagement and Program Clarity.** Program communications and outreach will be refined to improve customer understanding of expectations, performance requirements, and program benefits, with the goal of improving participation and satisfaction.

These changes are intended to strengthen program performance, improve cost-effectiveness, and ensure the Oregon Wattsmart Business Demand Response program continues to provide meaningful value to both customers and the electric system.

COOL KEEPER

Program Description

The Cool Keeper program aggregates residential and small commercial air conditioning load for use as a grid management resource. Through the program, PacifiCorp installs a small control device at no cost on a customer's central air conditioner or central heat pump.

In exchange for participating, customers receive an annual bill credit of approximately $30, distributed in monthly credits on their PacifiCorp bill during the cooling season (May through September), even if no events occur each year. (Participants with systems 5.5 tons or larger receive a monthly bill credit of $12, for a maximum annual incentive of $60).

Cool Keeper is primarily used as contingency reserve capacity, and as a frequency response resource. The remote-control cellular switches are capable of instant response, which is necessary for both contingency and frequency events. In addition, these types of grid management never exceed 30-minute duration, making them highly compatible with customer air-conditioning needs.

The program is approved by the Oregon Public Utility Commission and operates under PacifiCorp's demand response tariff (Schedule 106). It supports the company's broader clean energy and resource planning goals by freeing up generation resources to serve load (reducing the need for expensive power purchases) and supporting grid reliability as renewable energy resources continue to grow.

Cool Keeper is currently available in select areas of Oregon, with plans for broader expansion as the program grows. Participation is optional, and customers may un-enroll at any time. In addition, customers may opt out of events for a 24-hour period twice per year.

Participation Targets

- **Targeted participants:** PacifiCorp projected approximately 6,000 residential customers enrolled in Oregon during the 2025 program year.[42]
- **Estimated demand response capacity:** These participants were expected to provide about 12 MW of summer peak load reduction statewide.

Participant Experience

- In 2025, the program relied primarily on localized email campaigns in eligible areas. Customers enrolled via a portal on the PacifiCorp website.

[42] https://edocs.puc.state.or.us/efdocs/HAU/adv1708hau335613026.pdf

- Technicians from PacifiCorp's implementation contractor, Franklin Energy, examined each applicant's system to confirm compatibility, and then installed a program-provided Cool Keeper device on the outdoor compressor unit.
- Approximately 100 devices were enrolled in time to start receiving the bill credit in August. Another 550 devices were enrolled before the end of September and earned the September credit. Participants that enrolled on October 1 or later will begin receiving bill credits in May 2026.
- In 2025, 97 of 98 events were for frequency response, and lasted just 5 minutes. There was one contingency event, which lasted 30 minutes.

Program Activity

Start-up and Launch: After the cancellation of the Optimal Time Rewards program in 2024, PacifiCorp prioritized the rapid launch of Cool Keeper as a replacement approach to capture air conditioning load. The Company leveraged program design in place for over 20 years in its Utah territory, as well as that program's DERMS platform, and other administrative structures and practices. PacifiCorp filed the Cool Keeper program in February, and it was approved in March. By June, start-up activities had begun, and the first customers were enrolled by August.

Geographic Expansion: Cool Keeper relies on trained technicians to install and maintain the load control switch devices. The program expanded gradually in 2025, as additional technicians were hired and trained.

August 2025	Rogue Valley (Medford, Grants Pass, Central Point, and surrounding areas)
September 2025	Central Willamette Valley (Albany and Corvallis areas)
October 2025	Central Oregon (Bend, Madras, Prineville, and Redmond areas)
	Umpqua Valley (Roseburg, Myrtle Creek, Sutherlin, and Winston areas)

Reliability: The average device communication rate for the Cool Keeper switches was 98.6% from August through September.

Cool Keeper Load Events

Cool Keeper events occurred from August, when the first participants were enrolled, through the end of October.

Table 16: Cool Keeper Load Control Events

Month	Number of Events	Max of Estimated Load Reduction at Gen (MW)	Average Estimated Load Reduction at Gen (MW)
August	11	0.12	0.05
September	51	0.41	0.08
October	36	0.02	0.00

Table 17: Program Performance for Cool Keeper

Maximum Potential MW (at Site, year-end)	5.2
Maximum Potential MW (at Gen, year-end)	5.6
Average Realized Load MW (at Gen)	0.05
Maximum Realized MW (at Gen)	0.41
Total Participating Customers (year-end)	2,593

Program Costs

Table 18: 2025 Cool Keeper Program Costs

Category	Amount
Incentives	$1,672
Delivery	$1,239,165
PacifiCorp Internal Costs	$49,290
Marketing Costs	$151
Total Cost	**$1,290,278**

Cost Effectiveness

Table 19: 2025 Cool Keeper Cost Effectiveness[43]

Parameter	2025
Per-Unit Avoided Cost Rate ($/kW)	$153.38
Incentives	$1,672
Delivery and Meter Upgrades	$1,239,165
PacifiCorp Internal Costs	$49,290
Participant Costs for TRC (Test 1)	$1,340,822
Participant Costs for TRC (Test 2)[44]	$1,340,404
Utility Cost Test (UCT)[45]	**0.67**
Total Resource Cost Test (TRC) (1)[46]	**0.73**
Total Resource Cost Test (TRC) (2)	**0.67**

Key Findings and Future Changes

1. Although start-up was rapid compared to a typical program launch, the process to file the program and some delays during start-up pushed the start of customer enrollments forward by about 4 months. As a result, PacifiCorp was only able to enroll 2,639 of the targeted 6,000 devices in 2025. The company does expect to meet its original forecast of 8,000 incremental units installed in 2026.
2. The Cool Keeper program offer proved popular with customers. In just over 4 months, the program was able to recruit over 2,500 customers, equivalent to the number of smart thermostat participants that had enrolled in the Optimal Time Rewards program in 2024 over a 10-month time frame.[47]
3. Targeted emails served as the primary marketing channel in 2025, accounting for all enrollments. In 2026, the program implementer, Franklin Energy, expects to email productivity to taper off as the early

[43] See Appendix 3 for detailed cost-effectiveness results.
[44] Removes the estimated value of lost service.
[45] The Cool Keeper Program did not meet the Utility Cost Test (UCT) primarily because utility-incurred costs—driven by delivery, metering, and infrastructure investments—exceeded the value of avoided energy and capacity benefits in the reporting period. These elevated implementation and system enablement costs were not offset by near-term benefits, resulting in a below-threshold UCT outcome.
[46] The Cool Keeper Program did not meet the Program Total Resource Cost Test (PTRC) due to total resource costs outweighing the associated benefits. While the PTRC includes both utility and participant cost impacts, the level of overall program investment, particularly for delivery and infrastructure, exceeded the incremental avoided costs, leading to a failure to achieve cost-effectiveness under this test.
[47] *Pacific Power 2024 Demand Response Report*, filed March 28, 2025, in Docket ADV 1383 (https://edocs.puc.state.or.us/efdocs/HAH/adv1383hah335742042.pdf).

adopters are enrolled in the program. As email becomes less effective, the program will shift to rely more on door-to-door canvassing and other outreach channels.

4. The cellular connection from the LCR devices proved extremely reliable in 2025, with 98.6% communicating on average.
5. The Cool Keeper Program is a newly implemented demand response program (approved in 2025 and launched in late 2025) the program is in its early ramp-up phase, with phased geographic expansion, increasing enrollment targets, and significant upfront infrastructure and delivery investments intended to support long-term resource growth.

WATTSMART BATTERY PROGRAM

Program Description

PacifiCorp's Wattsmart Battery Program is a customer-facing, incentive-based energy storage demand response program in Oregon designed to enhance grid reliability, reduce system costs, and support the state's clean energy and decarbonization goals. The program enables PacifiCorp to aggregate customer-owned battery systems into a distributed energy resource (DER) network, functioning as a virtual power plant (VPP) that can be dispatched to address grid needs.[48]

The program is a key component of PacifiCorp's broader Oregon Clean Energy Plan (CEP) and Integrated Resource Plan (IRP) strategy. By leveraging behind-the-meter battery storage, PacifiCorp can defer or avoid investments in traditional peaking resources, reduce reliance on higher-cost and higher-emission generation, and improve system flexibility as renewable penetration increases. The program also supports Oregon's policy objectives under HB 2021, which requires deep greenhouse gas reductions culminating in a 100% clean electricity supply by 2040.

Eligible residential and nonresidential customers who install qualifying battery storage systems may enroll in the program and agree to allow PacifiCorp to dispatch a portion of their battery capacity during grid events. Dispatches are typically short-duration, and customers retain backup power functionality for outages based on their system configuration.

2025 Participation Targets and Enrollment

The program offers a strong upfront financial incentive to drive adoption:

- $600 per kilowatt (kW) of eligible battery capacity, capped at $3,000 per battery for residential customers (two-battery limit per home)
- Ongoing annual bill credits of $15 per kW, beginning in year two
- A four-year participation commitment is required to retain the upfront incentive.
- Commercial customers installing battery systems larger than 30 kW work with the utility to customize participation based on the specifics of the project.

These incentives can be stacked with other programs, including Energy Trust of Oregon incentives[49] and federal tax credits,[50] significantly reducing net customer costs and improving accessibility.

[48] https://www.pacificpower.net/savings-energy-choices/wattsmart-battery-program.html
[49] The Energy Trust of Oregon did not allow the stacking of incentives until December 12, 2025.
[50] Federal tax credits ended December 31, 2025.

Battery Program Events

Table 20: Wattsmart Battery Program Events

Month	Number of Events	Estimated Average Performance at Site (MW)
July	16	0.048
August	25	0.128
September	61	0.224
October	38	0.368
November	17	0.456
December	17	0.512

Table 21: Program Performance for Wattsmart Batteries

Maximum Potential MW (at Site)	0.512
Total Participating Batteries	64

Program Costs

Table 22: 2025 Wattsmart Battery Program Costs

Category	Amount
Customer Incentives	$207,000
Delivery	$16,551
Internal Administrative Costs	$45,006
Marketing Costs	$6,830
Total Cost	**$275,387**

Cost Effectiveness

Table 23: 2025 Battery Cost Effectiveness[51]

Parameter	2025
Per-Unit Avoided Cost Rate ($/kW)	$216.26
Incentives	$207,000
Delivery and Meter Upgrades	$16,551
Marketing Costs	$6,830
PacifiCorp Internal Costs	$45,006
Participant Costs for TRC (Test 1)	$275,387
Participant Costs for TRC (Test 2)[52]	$275,387
Utility Cost Test (UCT)[53]	**0.20**
Total Resource Cost Test (TRC) (1)	**0.20**
Total Resource Cost Test (TRC) (2)	**0.20**

[51] See Appendix 3 for detailed cost-effectiveness results.

[52] Removes the estimated value of lost service.

[53] The Wattsmart Battery Program in Oregon was approved in early 2025 and remains in the initial stages of implementation and customer adoption. As a newly introduced demand response resource requiring significant upfront participant investment and enabling infrastructure, the program is in a ramp-up phase where participation levels and dispatchable capacity are still developing. Consistent with early-stage distributed energy resource programs, near-term costs may exceed realized benefits, with cost-effectiveness expected to improve as enrollment increases and system benefits scale over time.

Key Findings and Future Changes

1. **Customer-sited batteries are a cost-effective grid resource**

Early program design and regulatory review concluded that aggregated, customer-owned batteries can provide local grid support at lower cost than traditional generation, particularly when used for short-duration dispatch events (minutes rather than hours).

2. **Strong customer uptake is driven by upfront incentives.**

Stakeholder comments and market response showed that meaningful upfront incentives are essential to drive participation, especially given the high capital cost of battery storage.

- The approved $600/kW upfront incentive (up to $3,000 per battery) was viewed as sufficient to stimulate early adoption.
- Stacking with Energy Trust of Oregon incentives and federal tax credits materially improves affordability.

3. **Program aligns with HB 2021 and Clean Energy Plan needs.**

The Oregon PUC and stakeholders recognized the Wattsmart Battery Program as a practical implementation tool that also supports emissions reductions.

- Distributed storage supports renewable integration.
- Batteries could help manage hourly clean energy requirements anticipated under HB 2021.

4. **Expansion will be implemented gradually over time.**

The Program will continue to scale up, with an anticipated increase in both participant enrollment and battery system eligibility.

5. **Enhanced integration with Clean Energy Plan and IRP**

As an expansive VPP inclusive of battery systems throughout PacifiCorp service area, the Wattsmart Battery Program may evolve over time into a program treated as an operational resource.

- Battery enrollment could inform distribution system planning.
- Participating battery storage systems could be coordinated with broader IRP storage targets.

6. **Other rebates and incentives fall short of prioritizing battery storage systems capable of addressing prioritized grid needs.**

PacifiCorp sees an opportunity in aligning with other funding sources, particularly those from the Energy Trust of Oregon and ODOE, with the goals of the Wattsmart Battery Program. Incentivizing battery storage systems able to be dispatched by the utility stacks the benefits to the larger grid community atop those of the individual customer.

Key findings confirm that customer-sited batteries provide real system value, align with HB 2021 decarbonization goals, and offer a cost-effective alternative to traditional utility response to grid needs. The next phase focuses on scaling enrollment and expanding the list of eligible battery systems.

COMMUNITY-BASED RENEWABLE ENERGY RESILIENCE HUB (CBRE-RH)

Pilot Description

The Community-Based Renewable Energy Resilience Hub Pilot (Pilot) was first proposed in the Company's inaugural Clean Energy Plan (CEP) and was approved in late 2024. PacifiCorp received authorization to spend up to a total of $4 million through 2027 in support of Community-Based Renewable Energy (CBRE) projects in the State

of Oregon. The Pilot allows PacifiCorp to continue to focus on resilience within critical facilities in Oregon communities and:

- Extends the Company's ability to provide ongoing technical assistance to communities seeking to increase resiliency at facilities critical to community emergency management and disaster response.
- Allows PacifiCorp to support the integration of battery storage systems of certain planned and existing CBRE projects so that they can provide both grid services and community energy resilience. This will also provide valuable learning related to nonresidential battery energy storage systems in Oregon; and,
- Provides communities seeking external grant awards an opportunity to apply for "matching funds" that would meet the requirements of those grants.

The Pilot enables PacifiCorp to build on previous work to advance community resilience, which has offered both technical assistance to critical facility customers and provided funding support for battery storage systems since 2019. Importantly, the CBRE-RH Pilot has advanced the Company's capability to partner with communities at various stages of solar + storage CBRE project development to see that system-wide benefits can be maximized alongside the local resilience benefits unique to these projects. This Pilot seeks to answer questions pertinent to the Company's development of a more comprehensive approach to battery energy storage systems.

Program Costs

Table 24: 2025 CBRE-RH Pilot Costs

Category	Amount
Technical Support	$165,515
Direct Project Support	$2,349
Grant Match Funding	$0
General Administrative Costs	$167,658
Total Cost	**$335,522**

Key Findings and Future Considerations

1. **Communities require a great deal of support when considering CBRE projects.**
   - Most communities are at the beginning stages of project consideration and pre-planning. Many lack bandwidth to even take advantage of the pathways of support that exist for CBRE projects.
   - Technical support does not necessarily result in project advancement. Many recipients of C-REP planning grants have opted not to move forward with construction.
2. **As state and federal grant opportunities continue to dry up, community resilience projects will grow even more challenging.**
3. **PacifiCorp will continue to work with communities to prepare grant funding from the Oregon Department of Energy (ODOE).**
4. **The CBRE-RH Pilot will leverage relationships with project managers to compile a final report.**
   - Learning outcomes from partner projects will be instrumental in informing future utility planning and actions related to CBRE projects.