

November 25, 2015

***VIA ELECTRONIC FILING  
AND COURIER DELIVERY***

Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

**RE: Advice 15-06—Pacific Power & Light Company Petition for a Rate Increase Based on a Modified Commission Basis Report, Two-Year Rate Plan, and Decoupling Mechanism**

Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits for filing and approval by the Washington Utilities and Transportation Commission (Commission) proposed new tariff sheets applicable to electric service supplied by the Company in the state of Washington, effective 30 days after this filing. Pacific Power agrees to a suspension of the tariffs, but requests that the Commission expeditiously adjudicate the petition, so that new rates will become effective on May 1, 2016. The proposed new tariff sheets are included in Exhibit No. JRS-8 to this filing. Under WAC 480-07-510(2), three copies of the proposed new tariff sheets are provided in legislative format.

By the enclosed tariff sheets, Pacific Power proposes a first-year overall price change of \$10.0 million, or 2.99 percent, with a requested rate effective date of May 1, 2016. The filing is based on a historical test period of the 12 months ended June 30, 2015, adjusted for known and measurable changes. This filing also proposes a two-year rate plan that includes a second-step rate increase, with a requested effective date of May 1, 2017. Pacific Power will file new tariffs to implement the second-step rate change as directed by the Commission in compliance with the final order on the petition.

A summary of the relief requested, the reasons Pacific Power is seeking this relief, and an overview of the topics covered by each of Pacific Power's witnesses is provided in the pre-filed direct testimony of Mr. R. Bryce Dalley, Exhibit No. RBD-1T. The Company has enclosed nineteen paper copies of Pacific Power's pre-filed direct testimony and exhibits supporting this filing. Also enclosed is one copy of the testimony and exhibits in electronic format.

Pacific Power has marked certain pages of its filing "CONFIDENTIAL." These documents are protected from any further disclosure by the Commission or the Office of the Attorney General, including their outside experts, under RCW 80.04.095 and WAC 480-07-160. Pacific Power's filing includes a motion requesting that the Commission issue a protective order to govern disclosure of confidential information for use in this case.

Pacific Power requests that the documents contained in the envelopes identified with the cover page marked "CONFIDENTIAL PER WAC 480-07-160," as well as the files marked "CONFIDENTIAL" or "CONF" on the versions of the CDs containing confidential materials, be treated as confidential under the provisions of WAC 480-07-160 because they contain sensitive commercial information. In accordance with WAC 480-07-160(3)(c), Pacific Power has enclosed redacted versions of the documents containing confidential information along with the non-confidential documents in its filing, and has placed unredacted versions of the documents containing confidential information in separate envelopes with corresponding "CONFIDENTIAL PER WAC 480-07-160" labels on the envelopes. Each page of the unredacted version containing confidential information is printed on yellow paper.

The petition is not a general rate case as defined in WAC 480-07-505(1). Nevertheless, to facilitate expeditious review of the petition, the Company has enclosed three paper copies of supporting workpapers, defined under WAC 480-07-510(3), as well as providing the workpapers in electronic format on the enclosed CDs. Where feasible, paper copies have been provided; however, due to the considerable size and format of the documents, many documents are provided only in electronic format. Certain workpapers and models are being provided as confidential under WAC 480-07-160(3).

In addition, as outlined in WAC 480-07-510(7), the Company has also enclosed one copy of the following: the Company's most recent FERC Form 1; the Company's Form 10Ks and Form 10Qs; the Company's most recent bond issuance prospectus; and the 2014 Affiliated Interest Report. There are no annual or quarterly reports to shareholders.

Because Pacific Power agrees to suspend the proposed tariff filing, it is not required to publish notice immediately before or coincident with the date of this letter and filing. Accordingly, the Company will provide notice to the public under WAC 480-100-197. In compliance with WAC 480-100-193(1), Pacific Power will also post the proposed changes to its tariff sheets for public inspection and review on its website.

Attachment A to this letter is the Summary Document, described in WAC 480-07-510(4). Under WAC 480-07-510(5), Pacific Power is serving copies of the Summary Document on the persons listed on the attached Certificate of Service. Attachment B to this letter is a listing of the tariff sheets proposed to be revised. Attachment C is the Printed Index for all electronic files included with this filing.

Please direct all service and correspondence related to this filing to:

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PacifiCorp Washington Dockets  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[WashingtonDockets@PacifiCorp.com](mailto:WashingtonDockets@PacifiCorp.com)

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

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
Pacific Power & Light Company  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232

Please direct any informal inquiries regarding this filing to Ariel Son at (503) 813-5410.

Sincerely,



R. Bryce Dalley  
Vice President, Regulation

Enclosures