

December 20, 2013

VIA ELECTRONIC FILING

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: Docket A-130355—Rulemaking to Consider Possible Corrections and Changes in Procedural Rules in WAC 480-07

Dear Mr. King:

In response to the Notice of Opportunity to File Written Comments issued by the Washington Utilities and Transportation Commission (Commission) on November 14, 2013, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp) submits the following written comments on the draft rules for Part I of WAC Chapter 480-07 (WAC 480-07-010 through 480-07-180).

PacifiCorp understands that the proposed revisions to Part I will be discussed at the workshop scheduled for January 15, 2013. PacifiCorp plans to participate in that workshop and would specifically like to discuss the following recommendations:

- **WAC 480-07-140(5)(c), File Naming Conventions:** PacifiCorp recommends shortening the required file names for electronic documents. Long document titles inhibit the copying of files correctly from the computer to CD/DVD. A shorter file name will allow the documents to copy correctly and open on any computer. This issue is related to other provisions of the procedural rules, including requirements related to submission of work papers and exhibit marking, and PacifiCorp will have a specific proposal for file names once those provisions have been addressed.
- **WAC 480-07-160:**
 - PacifiCorp recommends that the rules governing the distribution of confidential information electronically allow for the encryption or password protection of confidential information e-mailed to the parties to Commission proceedings, including responses to data requests. Confidential information includes commercially sensitive information that could harm the utility and its customers if publicly released. Confidential information may also include information protected by the North American Electric Reliability Corporation's Critical Infrastructure Protection Standards. To meet these standards, certain information must be encrypted if sent to non-company e-mail addresses or stored to an electronic medium, such as a CD or DVD.

- PacifiCorp recommends revisiting the requirements for marking confidential documents. It is administratively burdensome to mark each individual page of a document containing confidential information with a long legend, particularly when the document is a large Excel file or working Excel model. PacifiCorp welcomes the opportunity to discuss alternatives at the January 15 workshop.

PacifiCorp appreciates the Commission's efforts to update and clarify its procedural rules, as well as the opportunity to participate in the process. Please direct inquiries to Bryce Dalley, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6389.

Sincerely,

A handwritten signature in black ink that reads "William R. Griffith / P80". The signature is written in a cursive, flowing style.

William R. Griffith
Vice President, Regulation