

April 10, 2023

Received  
Records Management  
Apr 10, 2023***VIA ELECTRONIC FILING***

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**RE: Docket UE-230172—PacifiCorp’s Revised Tariff Sheets – DO NOT REDOCKET**

On March 17, 2023, PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) submitted its 2023 general rate case with the Washington Utilities and Transportation Commission (Commission). The Company’s tariff sheets reflected an effective date of May 1, 2023, a date beyond the 30-day period required under Commission rules. On March 23, 2023, PacifiCorp was contacted by Staff regarding issues with certain URLs in testimony and broken links in supporting workpapers. The Company and Staff worked collaboratively to resolve these non-substantive issues and the Company had scheduled meetings with Staff on rate case topics as Staff began their review of the Company’s case. The Company had planned to make an errata filing to address these non-substantive testimony and workpaper issues.

On March 31, 2023, the Company was informed that under WAC 480-07-141(2)(c), the Commission was rejecting the filing and the Company would have to file the errata and resubmit revised tariff sheets with a new effective date (30 days from the submission of the errata). Even though no party had requested that the filing be rejected, the Company was denied the opportunity to cure the filing despite working with Staff and the non-substantive nature of the errata.

On April 4, 2023, the Company filed the errata testimony and supplemental exhibits that did not alter the Company's rate case in any substantive way. The errata sheets are simply to provide URL citations for publicly available documents that can otherwise be easily found on the internet. The supplemental exhibits for Ryan D. McGraw, Rick T. Link, and Thomas R. Burns do not change the content of initial testimony in a substantive manner, some of which were initially provided as workpapers instead. Further, the Company re-filed workpapers correcting the broken links within those documents, and, at the request of the Commission, renamed the workpapers to include the docket number. Finally, the Company filed revised tariff sheets with an effective date of May 4, 2023, which was 30 days from the date of the errata filing. The Commission notified PacifiCorp on April 6, 2023, that the documents were all in order and Commission accepted its filing.

However, on April 7, 2023, the Company received an email from the Commission’s Public Record Officer that the revised tariff sheets still reflected the issue date of March 17, 2023, the original date of filing and informing the Company that the tariff sheets must be refiled because they did not update the issuance date and that the effective date must be further revised, effectively rejecting the April 4, 2023 filing solely based on the issue date in the tariffs.

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PacifiCorp contacted the Public Record Officer to determine the basis for the determination that the issue date could not be corrected, but has not received any clarification as to how the issue date has precluded evaluation of the filing. The issue date is a non-substantive modification as the tariffs are likely to be suspended and reissued following the completion of a fully litigated proceeding.

In compliance with this directive, and to avoid further delay, the Company is filing revised tariff sheets, which are contained in Exhibit No. RMM-11r accompanying this filing. In accordance with WAC 480-07-510(2), the proposed new tariff sheets are also provided in legislative format. PacifiCorp's proposed tariff schedules reflect an issuance date of April 10, 2023 and an effective date of May 10, 2023.

This inadvertent and non-substantive issue has not impaired or hampered the Commission's ability to timely review, analyze, or act on the merits of the Company's filing, nor has the Company identified another rule that would require rejection of the filing. The Company continues to meet with Staff to discuss substantive topics in its filing.

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

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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)

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Please direct any questions to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

          /s/          

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Enclosures

230172-PAC-Exh-RMM-11r-4-10-23.pdf