



**VIA ELECTRONIC MAIL**

<records@wutc.wa.gov>

July 11, 2003

Ms. Carole J. Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

**Re: Rulemaking Docket No. A-010648  
WAC 480-09 – Procedure**

Dear Ms. Washburn:

In response to the Commission's June 30 Notice of Opportunity to Comment, PacifiCorp dba Pacific Power & Light Company ("PacifiCorp") hereby submits written comments on the second discussion draft of the proposed new procedural rules. PacifiCorp appreciates the Commission's efforts in revising the rules to reflecting the parties' written comments and the discussions at the June 9 workshop. These comments will focus on the few issues that remain after taking into account the revisions incorporated in the second discussion draft.

**Comments on Specific Proposed Rules**

**480-07-470(12) Hearing guidelines.** The second discussion draft includes a provision relating to redirect examination that appears to define the scope or redirect too narrowly. PacifiCorp suggests that the provision be revised as follows:

**(12) Redirect examination.** A party whose witness has been cross-examined may conduct redirect examination of the witness on those issues raised during cross-examination of such witness~~that responds to the questions asked on cross.~~

**480-07-510 General rate cases.** As discussed in our initial comments of April 30, section 3(f) imposes as a new requirement that workpapers be included which contain




“[i]nformation about every transaction with an affiliated interest or subsidiary that *directly or indirectly affects* the proposed rates,” including “a full description of the relationship, terms and amounts of the transaction, the length of time the relationship has been ongoing, and an income statement and balance sheet for every affiliated entity.” (emphasis added.) Although the second discussion draft includes additional language that recognizes this information may be duplicative of the filing requirements under consideration by the Commission in Docket No. A-021178, the provision remains unnecessarily broad and burdensome. Inclusion of the terms “*directly or indirectly affects* the proposed rates” incorporates a standard that is not precise enough to enable compliance. The scope of this provision (if included at all) should be limited to correspond to the scope of the periodic reports that will be required under the rules being developed in the Docket No. A-021178 rulemaking. Given the information that will be required to be filed under those rules, the only additional requirement that should be imposed upon the filing of a general rate case is supplementing that information to cover the period through the end of the test period. PacifiCorp proposes that subsection 3(f) be replaced in its entirety with the following language:

(f) Supplementation of the annual subsidiary transaction report and annual affiliated interest transactions report required under WAC 480-100-208 [for electric utilities], as necessary, to include all transactions during the test period.

PacifiCorp appreciates the opportunity to provide these supplemental comments on the second discussion draft. PacifiCorp looks forward to continued participation as the rulemaking process moves forward. Please direct any questions to either the undersigned at (503) 813-6092 or Jeff Payne at (503) 813-6032.

Very truly yours,

**PacifiCorp**

By   
Christy Omahundro  
Director, Regulation