

December 13, 2019

AND OVERNIGHT DELIVERY

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

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COMMISSION

**RE: Advice No. 19-08
PacifiCorp dba Pacific Power and Light Company – 2021 General Rate Case**

PacifiCorp dba Pacific Power and Light Company (PacifiCorp or the Company), 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 to become effective on January 1, 2021. The proposed new tariff sheets are contained in Exhibit No. RMM-18 accompanying this filing. In accordance with WAC 480-07-510(2), the proposed new tariff sheets are also provided in legislative format.

By the enclosed tariff sheets, PacifiCorp requests an increase in revenues of approximately \$3.1 million from Washington operations, offset by the approximately \$7.1 million proposed amortization of certain tax reform benefits, resulting in an overall price reduction of approximately 1.1 percent, or \$4.0 million. The filing is based on a historical test period of the 12 months ended June 30, 2019, adjusted for known and measurable changes. Consistent with Commission precedent, the Company's net power costs are based on the pro forma period of the calendar year 2021, which corresponds to the rate effective period.

A summary of the relief requested, the reasons Pacific Power is seeking this relief, and an overview of the topics covered by each of PacifiCorp's witnesses is provided in the pre-filed direct testimonies of Mr. Stefan A. Bird, Exhibit No. SAB-1T, and Ms. Etta Lockey, Exhibit No. EL-1T, which are included in this filing. In compliance with WAC 480-07-510(1), the Company has enclosed and original and five paper copies of Pacific Power's pre-filed direct testimony and exhibits supporting this general rate case filing. One copy of the testimony and exhibits in electronic format is also included.

PacifiCorp has marked certain pages of its filing "DESIGNATED INFORMATION IS CONFIDENTIAL PER WAC 480-07-160." 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. PacifiCorp's filing includes a motion requesting that the Commission issue a protective order to govern disclosure of confidential information for use in this case.

PacifiCorp requests that the documents contained in the envelopes identified with the cover page marked “DESIGNATED INFORMATION IS CONFIDENTIAL PER WAC 480-07-160,” as well as the files marked “CONFIDENTIAL” or “CONF” on the versions of the USB drives 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(5), PacifiCorp 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 “DESIGNATED INFORMATION IS CONFIDENTIAL PER WAC 480-07-160” labels on the envelopes. Each page of the unredacted version containing confidential information is printed on yellow paper.

As required by WAC 480-07-510(4), the Company is providing the supporting workpapers in electronic format on the enclosed USB drives. Certain workpapers and models are being provided as confidential under WAC 480-07-160(3).

As required by WAC 480-07-510(7), the Company has also provided uniform resource locators (URLs) to the following additional documents: 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 2018 Affiliated Interest Report. There are no annual or quarterly reports to shareholders. Please see Attachment D.

In compliance with WAC 480-100-194, PacifiCorp agrees to suspend the proposed tariff filing and thus is not required to publish notice immediately before or coincident with the date of this letter and filing. PacifiCorp agrees to waive the suspension hearing and requests that the Commission issue an order suspending these proposed changes for investigation, and that a hearing to take testimony from the public be scheduled at the prehearing conference. Accordingly, the Company will provide notice to the public under WAC 480-100-197(2). In compliance with WAC 480-100-193(1), PacifiCorp will also post the proposed changes to its tariff sheets for public inspection and review on its website.

PacifiCorp’s proposed tariff schedules are dated March 1, 2020. Given the ten-month suspension period, PacifiCorp respectfully requests a rate effective date of January 1, 2021.

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

Washington Dockets
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Email: washingtondockets@pacificorp.com

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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

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232

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

Attachment A to this letter is the Summary Document prepared in compliance with WAC 480-07-510(5). In compliance with WAC 480-07-510(5)(b), PacifiCorp is serving copies of the Summary Document on the persons listed on the attached Certificate of Service. The Company's pre-filed testimony, exhibits and work papers are available from the Company on request. 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. Attachment D contains URLs to the documents required by WAC 480-07-510(7). Attachment E is a Supplement to the Company's 2018 Affiliated Interest Report.

Sincerely,

_____/s/
Etta Lockey
Vice President, Regulation
PacifiCorp
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Portland, OR 97232
(503) 813-5701
etta.lockey@pacificorp.com

Enclosures

Attachment A: Summary Document
Attachment B: List of Proposed Tariff Sheets
Attachment C: Index of Electronic Files
Attachment D: Supplemental Documentation
Attachment E: Supplement to PacifiCorp's 2018 Affiliated Interest Report