

October 23, 2014

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 September 22, 2014, Pacific Power & Light Company, a division of PacifiCorp (PacifiCorp or Company), 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 provides the following recommendations:

- **WAC 480-07-140(4)(d), Identification of Documents:** PacifiCorp recommends eliminating the requirement that cover letters include identification of all submitted documents. This requirement is overly burdensome for larger filings and filings that include numerous supporting workpapers.
- **WAC 480-07-140(6)(b), File Naming Conventions:** PacifiCorp recommends allowing exhibit numbers be used in lieu of document name and witness name in adjudicative proceedings. This will allow further abbreviation and prevent overly long document titles. Long document titles inhibit the copying of files correctly from the computer to CD/DVD. Shorter file names will allow the documents to copy correctly and open on any computer.
- **WAC 480-07-160, Confidential Information:**
 - PacifiCorp recommends that the rules governing the electronic distribution of confidential information 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 excluding workpapers from the requirements for marking confidential documents. It is administratively burdensome to mark each individual page of a workpaper containing confidential information with a long legend, particularly when the document is a large Excel file or working Excel model, or never intended to be printed.

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 Natasha Soares, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6583.

Sincerely,

A handwritten signature in black ink that reads "R Bryce Dalley /w/s". The signature is written in a cursive, slightly slanted style.

R. Bryce Dalley
Vice President, Regulation