

June 19, 2014

***VIA ELECTRONIC FILING***

Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

Attention: Steven V. King  
Executive Director and Secretary

RE: Docket UE-140761 REVISED Schedule 191 – System Benefits Charge Adjustment

Mr. King:

On May 1, 2014, in accordance with RCW 80.28.050, RCW 80.28.060, WAC 480-80-121(1), and Order 01 in Docket UE-132047, Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submitted for filing in electronic format a proposed tariff sheet revision to Schedule 191—System Benefits Charge Adjustment (SBC) with an effective date of July 1, 2014. The filing proposed an annual increase to Washington customers of approximately \$60,000 to align the Company's SBC balancing account revenues with projected expenses. The filing was docketed as UE-140761.

On June 17, 2014, Washington Utilities and Transportation Commission staff notified the Company that the customer notice that was submitted in the Company's tariff filing did not meet the requirements under WAC 480-100-194. Specifically, it did not provide the impact on the average monthly residential bill and would need to be modified to include that information. Such a modification would necessitate an extension of the tariff effective date, in order to provide the customer notice required by rule.

As a result, the Company reassessed the need for the adjustment in relation to the cost of re-noticing customers and, given the small magnitude of the originally proposed rate change, is now requesting that no change be made to current rates. This is similar to the Company's April 29, 2011 filing (Docket UE-100170), in which the Company submitted a compliance filing and recommended no adjustment to Schedule 191.

Accordingly, the Company has amended the tariff sheet filed on May 1, 2014, to show no change to the currently approved rates, with an effective date of July 1, 2014:

Third Revision of Sheet No. 191.1

Schedule 191 - System Benefits Charge Adjustment

The current SBC collection rate is approximately \$10.2 million on an annual basis and was approved in Docket UE-130668 with an effective date of July 1, 2013. As of March 31, 2014, the SBC collection rate represents approximately 3.2 percent of Washington electric revenues.

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The forecast for June 30, 2015, shows the balance is projected to be under-collected by approximately \$60,000, including approved programs only. Due to the relatively small magnitude of the increase, the Company believes it is appropriate to leave the rates unchanged and avoid the additional costs to prepare another notice to customers. If the current tariff leads to an underfunded or overfunded balance at the end of the next twelve month period, the Company will request an appropriate rate revision in its May 1, 2015 filing.

Informal questions regarding this filing should be directed to Natasha Siores, Director, Regulatory Affairs and Revenue Requirement at (503) 813-6583.

Sincerely,

A handwritten signature in cursive script that reads "R Bryce Dalley / wcs".

R. Bryce Dalley  
Vice President, Regulation

Enclosures