

U-210590

September 26, 2022

**VIA ELECTRONIC FILING**

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop S.E.  
Lacey, Washington 98503

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COMMISSION

**RE: Docket U-210590—PacifiCorp’s Response Comments****I. Introduction**

On August 5, 2022, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Opportunity to Provide Written Comments providing the opportunity to respond to comments filed in this docket on September 6, 2022. PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) provides some additional comments based on a review of the proposed metrics filed by other parties.

PacifiCorp continues to support performance metrics that are simple, effective, and flexible enough to be tailored to the individual circumstances of each utility. As discussed in previous comments filed on June 13 and September 6, 2022, PacifiCorp recommends that any metrics developed through this process work to complement each other and work to create better cohesion and reduce administrative burdens with regards to this process and other existing reporting and metrics that are already collected and provided to the Commission.

PacifiCorp is committed to safeguarding the privacy of customers with respect to nonpublic, personal, and financial information. PacifiCorp further complies with applicable Washington law that provides for the protection of customer information.<sup>1</sup> To the extent that any proposed metric filed to this docket requires the accumulation and distribution of sensitive customer information, PacifiCorp requests that the Commission carefully consider the privacy interests of our customers before significantly increasing the type and amount of customer information that should be collected to support these metrics. PacifiCorp also requests the Commission to consider circumstances where customers choose not to provide the Company with the personal information necessary to comply with a given metric.

PacifiCorp is additionally concerned that some of the proposed metrics may provide for the different treatment of customers within the same customer class. Such policies have been traditionally inconsistent with law and ratemaking policy, and therefore PacifiCorp would request the Commission carefully consider the adoption of metrics that address these issues.

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<sup>1</sup> RCW 19.29A.100 (Electric Utilities – Customer information); WAC 480-100-153 (Protection and disclosure of customer information).

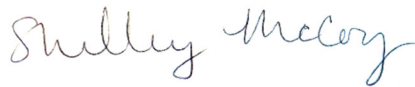
PacifiCorp also has specific concerns regarding the metric proposed by Public Counsel that could require regulated utilities to speculate as to the cause(s) of wildfires. PacifiCorp is unique among Washington electric utilities for the vast multistate nature of PacifiCorp's service territory. PacifiCorp has been heavily involved in the development of wildfire mitigation plans in Oregon and California, and is acutely aware of the risks of wildfires in our service territory. However, requiring regulated utilities to make a conclusion as to the cause(s) of a wildfire in proceedings that are addressing ratemaking issues may not be feasible. Determining the cause of a wildfire can be a heavily contested issue that could take many years. PacifiCorp would suggest that a better metric would be to track the wildfire prevention activities of utilities like vegetation management and system hardening.

## II. Conclusion

PacifiCorp has continually supported the core principle of providing safe and reliable service with affordable rates. PacifiCorp supports the use of new regulatory mechanisms to the extent they help the Company meet these goals.

PacifiCorp remains committed to extensively participating in this proceeding and working with the Commission and stakeholders through this process. PacifiCorp further appreciates the continued opportunity to provide written comments as this proceeding continues.

Sincerely,

A handwritten signature in cursive script that reads "Shelley McCoy".

Shelley McCoy,  
Director, Regulation