



**VIA ELECTRONIC MAIL**

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September 28, 2005

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: Docket No. UE-030311  
Rulemaking for Integrated Resource Planning Requirements**

Dear Ms. Washburn:

In response to the Commission's September 9 Notice of Opportunity to File Written Comments, PacifiCorp dba Pacific Power & Light Company ("PacifiCorp") hereby submits written comments on the Commission's proposed changes to WAC 480-100-238, the current "least-cost planning" rule. These comments are in addition to the comments filed by PacifiCorp in May 2005 in this docket. The draft rule included with the September 9 Notice is referred to herein as the "Proposed Rule."

**Comments on Specific Provisions in the Proposed Rule**

**Proposed WAC 480-100-238(1).** PacifiCorp supports replacing the term "load" with "system demand," as suggested in the Proposed Rule. In PacifiCorp's case, the planning it undertakes in its IRP goes beyond its retail load to include all obligations imposed on its system.

For similar reasons, the Commission may want to consider replacing "generating resources" with "energy supply resources." As noted in Puget Sound Energy's comments, "generating resources" may be narrowly read to exclude consideration of power purchase agreements and other supply-side measures. Reference to "energy supply resources" would more accurately capture the scope of the IRP process.

The Proposed Rule's use of the term "conservation" to replace the previous reference to "improvements in the efficient use of electricity" improves the readability of the Proposed Rule and better reflects the scope of the IRP process.

**Proposed WAC 480-100-238(2)(b).** The Proposed Rule includes a reference to “public policies regarding resource preference adopted by Washington state or the federal government.” As a multi-state utility, an important issue for PacifiCorp is preserving the consistency that currently exists among the states with respect to IRP rules. It is important to PacifiCorp that it be able to continue pursuing the IRP process in a manner that largely fulfills the requirements of each of the six states in which it operates. Imposing an explicit requirement that PacifiCorp include consideration of Washington-specific policies would considerably complicate its IRP process, and would make compliance more difficult. PacifiCorp attempts to take account of state-specific policies implicitly in its current IRP process. This has been found by the Commission to be sufficient in the past, notwithstanding Commission Staff’s critical comments on this issue with respect to the PacifiCorp’s previous IRPs. PacifiCorp urges the Commission to retain its existing policy on this point, which preserves necessary flexibility for PacifiCorp.

PacifiCorp supports the inclusion in the Proposed Rule of explicit consideration of future potential externalities. PacifiCorp’s current IRP includes considerable discussion of these issues, and such consideration is integral to the IRP process.

**Proposed WAC 480-100-238(3)(d).** PacifiCorp supports the inclusion in the Proposed Rule of a required assessment of “transmission system capability.” The Proposed Rule refers to both transmission capability *and reliability*, however, and PacifiCorp does not agree that transmission reliability should be assessed as part of the IRP process.

**Proposed WAC 480-100-238(3)(g).** PacifiCorp agrees with PSE’s comment that “will” should be replaced with “is designed to,” which better reflects the uncertainties of energy planning and acknowledges that plans may occasionally need to be refined or modified in light of changing circumstances.

**Proposed WAC 480-100-238(4).** In PacifiCorp’s view, it is not necessary to be overly prescriptive with respect to the development of the work plan. While the proposed twelve-month due date is preferable to the 16-month due date proposed in the previous draft, it is not clear that such a deadline is appropriate. The existing rule seems to be working fine in this regard, and the flexibility afforded by the current rule should be retained.

**Proposed WAC 480-100-238(5).** PacifiCorp supports the inclusion in the Proposed Rule of a reference to the process for comment on each utility’s IRP at a public hearing, which codifies the existing process.

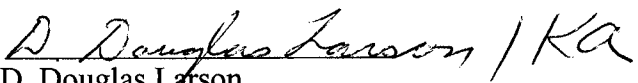
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### **Conclusion**

PacifiCorp appreciates the opportunity to provide written comments and looks forward to participating in the workshop on June 9. Please direct any questions regarding these comments to either the undersigned at (801) 220-2190 or Melissa Seymour at (503) 813-6711.

Very truly yours,

**PacifiCorp**

By  / KA  
D. Douglas Larson  
Vice President, Regulation