PACIFIC POWER
A DIVISION OF PACIFICORP

825 NE Multnomah, Suite 2000
Portland, Oregon 97232

March 30, 2018

VIA ELECTRONIC FILING

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

RE: Docket UE-170002—Staff Investigation into Generic Cost of Service

Pacific Power and Light Company (Pacific Power), a division of PacifiCorp, appreciates the Staff of the Washington Utilities and Transportation Commission (Commission) reaching out and involving all the parties in their efforts to create a Generic Cost of Service. For these particular issues, Pacific Power believes a consensus-based approach to addressing Staff's concerns will produce the best outcome.

Pacific Power is not raising any concerns at this time about Staff's proposed delineation between the issues appropriate for rulemaking and for a policy statement as outlined in the spreadsheet that was sent out to stakeholders. Pacific Power supports Staff's separation of procedural and cost of service format issues from cost of service methodology concerns, and the placement of the methodology concerns in a policy statement. Pacific Power believes that requiring a specific methodology through a rulemaking may not provide adequate flexibility for the utilities to properly address the needs of their different service territories or the changes in industry circumstances that may occur over time. Pacific Power remains committed to meaningful participation and continued involvement in this process.

Please direct inquiries to me at (503) 813-5410.

Sincerely,

/s/

Ariel Son
Regulatory Affairs Manager
Pacific Power & Light Company
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
(503) 813-5410
ariel.son@pacificorp.com