

March 27, 2020

**VIA ELECTRONIC FILING**

Mark L. Johnson  
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 UE-170002—PacifiCorp's Comments**

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03/27/20 14:06  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

On February 12, 2020, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Opportunity to File Written Comments on Proposed Rules in the rulemaking to address electric and natural gas cost of service. PacifiCorp dba Pacific Power & Light Company (PacifiCorp) appreciates the discussions with Staff and stakeholders over the last few years that have led to the proposed cost of service rules. The thoughtfulness and diligence of everyone involved has produced a robust and comprehensive outcome that will benefit Washington utility customers. Staff's leadership throughout this process has been exemplary, navigating a subject that can often be contentious and technically challenging.

PacifiCorp fully supports the proposed rules as they are currently written. Additionally, PacifiCorp has experienced a smooth transition in implementing these rules with the cost of service study it filed in its current general rate case.

The rules strike a reasonable balance between the interests of disparate customer groups while appropriately reflecting the drivers of cost. While different stakeholders likely do not agree with all aspects of the methodology selected, there are parts of it that appeal to everyone, which is the mark of a good compromise. Further, PacifiCorp believes that the rules will enhance the efficiency with which cost of service issues are dealt with in ratemaking proceedings.

PacifiCorp appreciates the incredible effort that have been put into this rulemaking, and looks forward to the rule adoption hearing on April 16, 2020.

Sincerely,

\_\_\_\_\_/s/  
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