

September 8, 2016

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

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

**RE: Docket UE-152253—Pacific Power & Light Company’s Expedited Motion to Revise
Compliance Filing Timelines in Order 12**

Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits for filing this Expedited Motion to Revise Compliance Filing Timelines in Order 12.

If you have any informal inquiries regarding this matter, please contact Ariel Son, Regulatory Projects Manager, at (503) 813-5410.

Sincerely,



R. Bryce Dalley
Vice President, Regulation

Enclosures

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT COMPANY,

Respondent.

DOCKET UE-152253

EXPEDITED MOTION TO REVISE
COMPLIANCE FILING TIMELINES IN
ORDER 12

1 In accordance with WAC §§ 480-07-385 and 480-07-883, Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, files this motion for a limited revision of the compliance filing timelines set forth in paragraph 329 of Washington Utilities and Transportation Commission’s (Commission) Order 12 in this case (Motion). Paragraph 329 requires the Company to submit its compliance tariffs “at least five full business days before their stated effective date, which shall be no sooner than September 15, 2016.” To ensure a rate effective date of Thursday, September 15, 2016, the Company must file its compliance filing by Thursday, September 8, 2016.

2 Pacific Power respectfully requests a two-business day extension to submit its compliance filing, to no later than 10:00 a.m., Monday, September 12, 2016, while allowing the Company to maintain an effective date of September 15, 2016, in the tariff sheets. The Motion thus requests a reduction in the Commission’s examination period for the Company’s compliance filing from five business days, as provided in Order 12, to three business days.

3 Pacific Power seeks this change in compliance timelines to allow it to continue to review Order 12, confer with Staff and other parties on revised tariff sheets, and prepare a compliance filing that meets the requirements of WAC 480-07-880 and 480-07-883. Order 12 identifies the total revenue deficiency (to the dollar) for each year of the rate plan in paragraphs 323 and 329, but does not include an adjustment-specific summary necessary for the preparation of tariffs and workpapers. The Company needs a short extension of time to complete its reconciliation and continue to work with Staff to confirm its accuracy.

4 If the Company is unable to replicate the Commission's revenue deficiency calculation, it will move for clarification by Monday, September 12, 2016. Allowing the Company to make its compliance filing on this same date, September 12, ensures alignment between the compliance filing (which will seek to implement all aspects of Order 12 that are clear) and any potential motion for clarification.

5 While the Motion reduces the examination period for the compliance filing, the Company believes that the Motion will result in a compliance filing that is more clear and accurate, obviating the need for a longer examination period. The Motion seeks an orderly compliance process, without delaying the effective date of the Company's needed revenue increase.

6 Pacific Power has conferred with all parties regarding a two-business day extension of time. No party objected to the request.

7 To ensure the accurate implementation of Order 12 and procedural fairness, Pacific Power respectfully requests that the Commission revise the compliance timelines in Order 12 as set forth in this Motion.

Respectfully submitted this 8th day of September, 2016.



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