

May 1, 2015

VIA ELECTRONIC FILING

Steven V. King
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 U-140621—Reply Comments of Pacific Power & Light Company

Dear Mr. King:

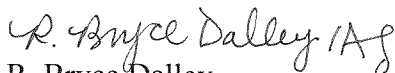
In accordance with the Notice of Opportunity to Respond to Written Comments (Notice) issued by the Washington Utilities and Transportation Commission (Commission) on March 24, 2015, Pacific Power & Light Company, a division of PacifiCorp (Pacific Power or Company), provides reply comments responsive to the comments submitted by April 17, 2015 (April 17 Comments).

Nine parties submitted comments in accordance with the Notice. Parties offered comments on the third draft of proposed rules to implement RCW Ch. 80-54 and provided responses to the list of issues raised in the Notice. The April 17 Comments largely reiterate positions and arguments previously presented through comments and workshops in this proceeding. Pacific Power stands by its comments previously submitted in this proceeding.

Additionally, Pacific Power observes that some parties, including Pacific Power, provided facts and empirical data to support responses to the list of issues contained in the Notice. Some parties offered general statements without evidentiary support. Pacific Power encourages the Commission to focus on the factual information presented as it deliberates on potential additional revisions to the proposed rules.

Pacific Power is available to provide additional information as needed to assist the Commission in finalizing rules that balance the interests of all parties. Informal questions concerning this filing may be directed to Natasha Soares, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6583.

Sincerely,


R. Bryce Dalley
Vice President, Regulation