



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

Public Counsel

800 Fifth Ave • Suite 2000 • MS TB-14 • Seattle, WA 98104-3188 • (206) 464-7744

September 7, 2020

SENT VIA WEB PORTAL

Mr. Mark Johnson
Executive Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: *PacifiCorp's Petition to Modify and Extend the Decoupling Mechanism;
Schedule 93—Decoupling Revenue Adjustment*
Docket UE-152253
Comments of Public Counsel

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in advance of the September 9, 2020 Open Meeting. These comments are in response to PacifiCorp's ("Company") Petition to Modify and Extend the Decoupling Mechanism ("Petition"). Public Counsel recommends rescheduling this agenda item to an open meeting later in 2021 or early 2022 and extending the current decoupling mechanism past its September 14, 2021, expiration date at least through the end of the year to provide sufficient time for parties to review the filing and submit comments.

Public Counsel's Recommendation:

Public Counsel recommends that the Commission remove this agenda item from the September 9, 2021, Open Meeting and reschedule it for an open meeting date in late 2021 or early 2022. Public Counsel also recommends that the Commission extend the current decoupling mechanism at least through the end of the year to allow sufficient time for review and submission of comments.

In its Petition,¹ the Company proposes a number of changes to its decoupling mechanism, including an adjustment to the decoupling deferral period and timing of the annual decoupling filings, removal of large general service and agricultural pumping service from the mechanism, tracking and true-up for all decoupled customers as one class, and adjustment of the earnings test. Although PacifiCorp's Petition describes various changes that would affect revenue and rates, it is unclear and vague about what the customer impacts would be. PacifiCorp filed several

¹ PacifiCorp's Petition to Modify and Extend the Decoupling Mechanism (Aug. 10, 2021).

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To: Mr. Mark Johnson, Executive Secretary
Re: Docket UE-152253, PacifiCorp's Petition to Modify and Extend the Decoupling Mechanism;
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workpapers in connection with the Petition, which will take time to review to better understand what impacts customers would experience under the requested decoupling mechanism changes.

In addition, PacifiCorp's request to remove large general service and agricultural pumping service from the mechanism will undoubtedly impact rates on other customer classes remaining in the mechanism. Rescheduling the open meeting item for this Petition and extending the current mechanism in the interim will allow parties to ascertain with greater specificity the rate impacts the Petition would have on customers.

With regard to PacifiCorp's requested timeline for the deferral period, except for the initial deferral period from September 15, 2021 to December 31, 2022, PacifiCorp requests that all other deferral periods thereafter begin on January 1st of each year. Therefore, rescheduling this matter for a later open meeting date in December 2021 or later would align with the annual deferral periods PacifiCorp requests in the Petition.

Public Counsel believes that it will be unduly prejudiced without additional time to review this Petition and multiple accompanying exhibits and workpapers as well as the other written comments in this Docket. Consideration of and ruling on the Petition at the September 9, 2021, Open Meeting based solely on PacifiCorp's evidentiary filing would represent an unfair and unbalanced process. Such an approach does not afford Public Counsel or others sufficient time to participate in the review process for the bill impacts that would result from the changes requested in this Petition. Rescheduling the open meeting date for this agenda item until the end of 2021 or beginning of 2022 and extending the existing mechanism in the interim will allow Public Counsel the necessary amount of time to review and offer comments in this docket on behalf of residential customers. This would allow a more detailed record for the Commission to consider the Company's request.

Public Counsel appreciates the opportunity to submit these comments. We will be present at the September 9, 2021, Open Meeting and will be available to answer any questions the Commission may have regarding these comments. Thank you.

Sincerely,

/s/ *Ann Paisner*
ANN N.H. PAISNER, WSBA No. 50202
Assistant Attorney General
Public Counsel Unit
(206) 573-1127
Ann.Paisner@ATG.WA.GOV