

May 17, 2013

VIA ELECTRONIC FILING

Steven V. King
Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
13000 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

RE: Docket A-130355—Rulemaking to Consider Possible Corrections and Changes in Procedural Rules in WAC 480-07

Dear Mr. King:

In response to the Washington Utilities and Transportation Commission's (Commission) March 22, 2013, Notice of Opportunity to File Written Comments and April 16, 2013, Notice Extending Time to File Written Comments, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp) submits the following written comments on correcting, changing, or clarifying the procedural rules in Chapter 480-07 WAC.

PacifiCorp supports the Commission's proposed review and revision to the Commission's procedural rules in Chapter 480-07 WAC. Given the extensive scope of this rulemaking proceeding, however, PacifiCorp proposes that the topics in the rulemaking be grouped by category to allow proposed rule changes to be addressed efficiently and consistently by all parties and the Commission. PacifiCorp proposes the rulemaking be grouped into the following categories:

Category I: Adjudicative Proceedings: Filing Requirements and Docket Management

- Revisions to rate case filing requirements.
- Filing and distribution of cross-examination exhibits.
- Exhibit identification/numbering in adjudicative proceedings.
- Possible new requirements for pre-filed responses to standard data requests.
- Creation and maintenance of official service list in adjudications (including courtesy e-mail distribution).

Category II: Settlement

- Procedures for Commission review of settlement agreements in cases involving suspended tariffs.
- Possible new or revised rules for settlements, including use of a qualified settlement judge for major cases.

Category III: Preliminary or Expedited Relief; Procedures for Administrative Review

- Procedures for Commission consideration of expedited rate filings.
- Procedures for requesting preliminary relief in adjudicative proceedings.
- Clarification or revision of initial orders before seeking administrative review.

Category IV: Complaints, Penalties, and Fees

- Procedures for initial evaluation of complaints filed against regulated companies.
- Procedures for penalty assessments.
- Procedures for enforcing annual report filing and regulatory fee payment.

Category V: Other Procedures

- Interested party access to confidential documents in non-adjudicative cases.
- Procedures for Commission consideration of dockets at Open Public Meetings, including filing deadlines.
- Procedures for Commission review of company Integrated Resource Plans, Requests for Proposals, Conservation Plans, and other I-937 filings.

PacifiCorp appreciates the opportunity to provide these preliminary comments and looks forward to participating in this rulemaking proceeding.

Please direct inquiries to Bryce Dalley, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6389.

Sincerely,



William R. Griffith
Vice President, Regulation