

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER &
LIGHT COMPANY,

Petition for an Order Approving Deferral
of Costs Related to Wildfire Claims.

Docket No. UE-230495

PacifiCorp’s Motion for Leave to File a
Reply

1 In accordance with WAC 480-07-370(5), PacifiCorp d/b/a Pacific Power & Light
Company (PacifiCorp or the Company) submits this Motion for Leave to File a Reply,
with the proposed reply included as Attachment 1.

I. BACKGROUND

2 On June 21, 2023, PacifiCorp filed its Petition for Accounting Order (Petition)
seeking an order authorizing the Company to defer the costs associated with third-party
claims due to wildfires in the Company’s service area. In the Petition, PacifiCorp
requested that the Washington Utilities and Transportation Commission (Commission)
delay consideration of the approval of its deferral application until the costs and the
impact on the financial stability of the Company are more fully known.

3 On March 4, 2024, Commission Staff submitted its Response To Petition For
Accounting Deferral Order (Response), requesting that the Commission deny the Petition.

II. ARGUMENT

4 Pursuant to WAC 480-07-370(5)(a), the Commission may grant a party leave to
file a reply upon a showing of good cause. When requesting leave to grant a reply, the
party must file a motion requesting permission to reply and explaining why a reply is

necessary including, but not necessarily limited to, how another party's answer raises new legal arguments.¹

5 WAC 480-07-370(4)(b) requires that any response to a petition be filed within 20 days. However, Staff filed its Response more than seven months after PacifiCorp filed its Petition. While Staff's initial decision to forgo responding to the Petition may have been reasonable given the Company's request that the Commission refrain from immediately ruling on the Petition, Staff has provided no explanation as to why Staff now seeks denial of the Petition without further information or proceedings. Staff's decision to seek denial of the Company's Petition months after the deadline for responding to the Petition provides good cause to grant the Company an opportunity to reply, particularly considering that Staff's previous lack of response was consistent with the Company's request to postpone consideration of the Petition.

6 In its untimely Response, Staff raises several new arguments that are outside the scope of the relief that PacifiCorp requested in the Petition. The Company requests leave to file a reply to respond to these new arguments and clarify the relief the Company is seeking at this time.

Dated: March 11, 2024.



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¹ WAC 480-07-370(5)(b).