

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

THE WALLA WALLA COUNTRY CLUB,

Complainant,

vs.

PACIFIC POWER & LIGHT COMPANY,

Respondent.

Docket UE-143932

**DECLARATION OF R. BRYCE  
DALLEY IN SUPPORT OF  
PACIFIC POWER & LIGHT  
COMPANY'S RESPONSE TO THE  
WALLA WALLA COUNTRY  
CLUB'S MOTION TO REJECT  
PETITION**

1 I am over 18 years of age and otherwise competent to testify.

2 I make this declaration based on personal knowledge as well as the business  
records of Pacific Power & Light Company (Pacific Power or Company), a division of  
PacifiCorp.

3 I am the Vice President, Regulation for Pacific Power. I am responsible for all  
regulatory activities in Washington, Oregon, and California.

4 PacifiCorp serves customers in six states. Pacific Power is one of three divisions  
of PacifiCorp and serves customers in Washington, Oregon, and California.

5 PacifiCorp maintains a department of Regulatory Operations, which includes  
what is internally referred to as the "document center." Almost all filings with the  
regulatory entities in the six states of operation, including the Washington Utilities and  
Transportation Commission, are completed by Company personnel in the document  
center.

6 Company personnel in the document center and regulatory affairs stay apprised of  
all procedural rules of the regulatory entities in the six states of operation.

7           Upon receipt of a prehearing conference order or the equivalent in other  
jurisdictions, Company personnel take note of the deadlines reflected in the order.

8           Upon receipt of the Prehearing Conference Order issued on January 21, 2015  
(Order 01), Company personnel interpreted the language of paragraph 15 regarding  
electronic submission of documents to modify the general or default time of day  
specification found at WAC 480-07-145(6)(a)(i).

9           Paragraphs 8, 9, 10, and 15 of the Prehearing Conference Order all include time  
of day specifications for various acts.

10          Company personnel interpreted the absence of any reference to 3:00 p.m. in  
paragraph 15, which addresses electronic submission of documents, to be a modification  
allowing filing and service up to 5:00 p.m. on the calendar day deadline.

11          All of Pacific Power's filings, following issuance of the Prehearing Conference  
Order, were completed after 3:00 p.m., but before 5:00 p.m., reflecting the Company's  
interpretation.

12          At no time before filing its Motion to Reject Petition did the Walla Walla Country  
Club raise an issue with the timing of Pacific Power's filings.

Dated this 18<sup>th</sup> day of February, 2016.

  
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R. Bryce Dalley  
Vice President, Regulation  
Pacific Power