**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 18th day of February, 2016.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  
 R. Bryce Dalley

Vice President, Regulation

Pacific Power