

**A-130355 Procedural Rules**  
**Summary of Initial Comments on Proposed Revisions to GRC Rules**  
**June 12, 2017**

480-07-	Energy Companies	ICNU	Solid Waste	WITA	Staff Response
500(4)	<p>Avista, PPL: Allow revisions to correct incidental errors or omissions without extending the tariff effective date</p> <p>PSE: Allow ALJ discretion to determine whether tariff effective date should be based on revised filing</p>		<p>WRRRA, SLG: Use same process in 141 for determining the effective date of submissions that must be corrected.</p>		<p>Staff's intent is to use the procedures in 141 for determining whether the effective date of the tariff needs to reflect the date on which the company submits a corrected version of the original submission. Staff will clarify the language accordingly.</p>
505(1)(b)	<p>PSE: Retain "on common equity" because an update to cost of debt alone should not trigger a full GRC.</p>				<p>Staff will be prepared to discuss this with stakeholders at the workshop.</p>
505(2)(a)	<p>AU: Expand proceedings that are not GRCs to include tracking mechanisms</p>				<p>Staff will be prepared to discuss this with stakeholders at the workshop.</p>
505(2)(d)	<p>PSE: Allow a company to withdraw if UTC converts limited rate case to GRC</p>				<p>Staff will be prepared to discuss this with stakeholders at the workshop.</p>

**A-130355 Procedural Rules**  
**Summary of Initial Comments on GRC Rules**  
**June 12, 2017**

480-07-	Energy Companies	ICNU	Solid Waste	WITA	Staff Response
505(3)	PSE: Substitute “will” for “do”		<p>WRRRA, SLG: In subsection (b), add recycling, yard waste, and processing fees to disposal fees as cost increases that a company can recover without initiating a GRC</p> <p>SLG: Expand subsection (e) to include company-specific adjustment mechanisms</p>	Modify to state, “Submissions for rate changes designed to recover only the costs a company incurs to comply with government actions that directly impact the company’s costs to provide regulated service (e.g., changes to state or local taxes or fees) or to comply with federal or state rules concerning the level of rates”	<p>PSE: Staff will make the suggested change.</p> <p>WRRRA, SLG: Staff will be prepared to discuss this with stakeholders at the workshop.</p> <p>WITA: Staff will be prepared to discuss this with stakeholders at the workshop.</p>
505(4)	PSE: Revised language gives UTC too much discretion to initiate a GRC		WRRRA: Requests general guidelines on when the Commission will declare a submission to be a GRC		Staff will be prepared to discuss this with stakeholders at the workshop.
505(5)	PPL: Clarify whether UTC will grant interventions before PHC; allowing discovery before PHC may be inefficient and inconsistent with scope and timelines established at the PHC		SLG: Interested in learning more about this provision		This subsection codifies current practice for most energy company GRC filings in which (a) the company agrees to immediate suspension and setting for hearing, rather than having the Commission take that action at an open meeting prior to suspension; and (b) the Commission does not grant interventions prior to the PHC but authorizes use of discovery for Staff and Public Counsel.

**A-130355 Procedural Rules**  
**Summary of Initial Comments on GRC Rules**  
**June 12, 2017**

480-07-	Energy Companies	ICNU	Solid Waste	WITA	Staff Response
510				Level of detail required is not applicable to Class B Telecommunications Companies, which should be authorized to file according to the requirements in 530	Staff will consider a propose revision to 530 to expand its applicability to Class B Telecommunications Companies.
510(1)	<p>AU: Allow hard copy filings the day after the electronic copies are submitted; providing the revenue requirement impact of each adjustment would be more useful than the impact on rate of return</p> <p>PSE: Delete “if the commission suspends the tariff changes and commences an adjudication” as confusing and unnecessary</p>	Add provision requiring responsive testimony to address the testimony to which it responds unless UTC approves more expansive testimony			<p>AU: Staff will revise the proposed rule to allow receipt of hard copies the next business day. Staff will be prepared to discuss the other issue with stakeholders at the workshop.</p> <p>PSE: Staff will substitute “in the event that” for “if” to clarify that the phrase modifies “direct case,” rather than creates a condition on the need to provide the documents.</p> <p>ICNU: Staff will be prepared to discuss this with stakeholders at the workshop.</p>
510(3)(a)	<p>AU: Clarify that work papers are not part of the record unless introduced into evidence</p> <p>PSE: Include a definition of “work paper” and do not require work papers to be filed</p>				Staff will be prepared to discuss this with stakeholders at the workshop.
510(3)(b)	PSE: Do not require voluminous or copyrighted materials to be filed				Staff will consider modifying the submission requirement to require only links to publicly available documents.

**A-130355 Procedural Rules**  
**Summary of Initial Comments on GRC Rules**  
**June 12, 2017**

480-07-	Energy Companies	ICNU	Solid Waste	WITA	Staff Response
510(3)(c)	AU: Requests clarification and guidance on cross-referencing methodology				Staff will be prepared to discuss this with stakeholders at the workshop.
510(3)(d)	PSE: Confidential information in certain tabs in models submitted as work papers cannot be marked as required in UTC rules	To avoid gamesmanship, add “Spreadsheet files may not include hard-coded numbers, except where the source of the hard-coded number is plainly identified and the source has been made available to parties.”			<p>PSE: WAC 480-07-160 requires confidential information in all documents, including workpapers, to be marked whether submitted for filing or provided informally to Staff. Accordingly, the filing requirement has no impact on a company’s obligation to mark the confidential information in workpapers.</p> <p>ICNU: Staff will be prepared to discuss this with stakeholders at the workshop.</p>
510(3)(e)	PSE: Work papers should not be filed, but if they are, all parties should be required to file them				Staff intends the rule to require all parties to file any work papers they prepare in support of their testimony and will clarify the draft revisions to make that clear, if necessary.
510(3)(f)	PSE: In subsection (i)(F)(ii), delete “Pro forma adjustments must be calculated based on the restated operating results” as overly burdensome and increasing the potential for errors				Staff will be prepared to discuss this with stakeholders at the workshop.

**A-130355 Procedural Rules**  
**Summary of Initial Comments on GRC Rules**  
**June 12, 2017**

480-07-	Energy Companies	ICNU	Solid Waste	WITA	Staff Response
510(3)(h)	<p>PPL: Explanations of company actions or inaction should be in testimony, not work papers</p> <p>PSE: For clarity, amend the last sentence to state, “If the company has not taken any such actions, the company must explain why it has not.”</p>				<p>PPL: Staff will be prepared to discuss this with stakeholders at the workshop.</p> <p>PSE: Staff will make that change.</p>
510(3)(j)	<p>PSE: Amend the last sentence to state, “The company must submit work papers for filing that must support the allocation method the company used to distribute common costs between regulated and nonregulated affiliated entities and the dollar amount of those costs.”</p>				<p>Staff will be prepared to discuss this with stakeholders at the workshop.</p>
510(4)	<p>PSE: Define “typical residential customers”</p>				<p>Staff will be prepared to discuss this with stakeholders at the workshop.</p>
510(5)	<p>PSE: Clarify the meaning of “cost studies” if they are not cost of service studies</p>				<p>Staff will be prepared to discuss this with stakeholders at the workshop.</p>
510(6)	<p>PSE: FERC, 10K, and 10Q forms are publicly available and should not be required to be filed</p>				<p>Staff will consider revising its proposal to require only a link to these documents.</p>

**A-130355 Procedural Rules  
Summary of Initial Comments on GRC Rules  
June 12, 2017**

480-07-	Energy Companies	ICNU	Solid Waste	WITA	Staff Response
515	PPL: UTC should allow itself more flexibility to address utility rates in an expedited manner	Opposes this rule as exacerbating the problem of frequently recurring rate case filings, not providing sufficient opportunity to review rate filings, and presenting the possibility of single issue ratemaking			Staff will be prepared to discuss this with stakeholders at the workshop.
515(1)(b)	AU: Requests clarification of the types of data to be provided  PSE: The company should provide data through the end of the last quarter, rather than month				Staff will be prepared to discuss this with stakeholders at the workshop.
515(1)(c)	PSE: Revise to state, "The company must maintain, and must not propose to change, its authorized rate of return on equity and capital structure from its most recent general rate proceeding."				Staff will be prepared to discuss this with stakeholders at the workshop.
515(1)(d)	PSE: Without PSE's proposed change in 515(1)(c), the requirement to update debt costs for known changes in this subsection is inconsistent with that subsection				Staff will be prepared to discuss this with stakeholders at the workshop.

**A-130355 Procedural Rules**  
**Summary of Initial Comments on GRC Rules**  
**June 12, 2017**

480-07-	Energy Companies	ICNU	Solid Waste	WITA	Staff Response
515(1)(f)	<p>AU: Recognize that power cost mechanism could be different for each company</p> <p>PPL: Allow certain production costs to avoid a GRC to update smaller fixed costs</p>				<p>AU: Staff will make that change.</p> <p>PPL: Staff will be prepared to discuss this with stakeholders at the workshop.</p>
515(3)(a)	<p>AU: Issue a final order within 120 days, rather than six months</p> <p>PSE: Issue a final order within 90 days, otherwise companies will be unlikely to pursue this option</p>				<p>Staff will be prepared to discuss this with stakeholders at the workshop.</p>
515(3)(b)	<p>PSE: Delete this subsection as providing the UTC with too much discretion to treat a limited rate case as a GRC</p>				<p>Staff will be prepared to discuss this with stakeholders at the workshop.</p>
520			<p>WRRRA: Add clarifying language that hard-coded cells are sometimes necessary and appropriate but that the underlying source of the data must be made available upon request</p>		<p>Staff will be prepared to discuss this with stakeholders at the workshop.</p>
520(1)			<p>WRRRA, SLG: Requiring legislative format for tariff changes would be confusing, complex, and time consuming and conflicts with rules specific to solid waste company tariff submissions</p>		<p>Staff is investigating this issue and will be prepared to discuss this with stakeholders at the workshop.</p>

**A-130355 Procedural Rules**  
**Summary of Initial Comments on GRC Rules**  
**June 12, 2017**

<b>480-07-</b>	<b>Energy Companies</b>	<b>ICNU</b>	<b>Solid Waste</b>	<b>WITA</b>	<b>Staff Response</b>
520(4)(a)			WRRR, SLG: Define “customer class” if it is substituted for “service type”		Staff will be prepared to discuss this with stakeholders at the workshop.
520(4)(d)			WRRR: Increase the threshold of percentage between regulated and nonregulated revenue to 20 percent to reduce the burden on smaller companies		Staff will be prepared to discuss this with stakeholders at the workshop.
520(4)(e)			WRRR, SLG: Companies should only be required to present nonregulated revenues in a consolidated fashion.		Staff will be prepared to discuss this with stakeholders at the workshop.
520(4)(g)			WRRR, SLG: Eliminate or limit the requirement to provide leases to real estate leases implicated by the filing and only upon request		Staff will be prepared to discuss this with stakeholders at the workshop.
520(4)(h)			WRRR: Requests guidance on required calculation of net investment  SLG: Modify to require figures as of the end of the period immediately preceding the submission, rather than end of test period		Staff will be prepared to discuss this with stakeholders at the workshop.
520(4)(i)			WRRR: Limit requirement for a detailed depreciation schedule to the entity making the tariff filing		Staff will be prepared to discuss this with stakeholders at the workshop.



**A-130355 Procedural Rules**  
**Summary of Initial Comments on GRC Rules**  
**June 12, 2017**

<b>480-07-</b>	<b>Energy Companies</b>	<b>ICNU</b>	<b>Solid Waste</b>	<b>WITA</b>	<b>Staff Response</b>
520(4)(j)			WRRRA: Delete this subsection as superfluous SLG: Opposes provision as written but open to discussion		Staff will be prepared to discuss this with stakeholders at the workshop.
General			WRRRA: Authorize companies to request temporary rate increases subject to refund 45 days from filing date		Staff will be prepared to discuss this with stakeholders at the workshop.
General			WRRRA: Allow companies to recover costs and fees for accounting and legal experts		Staff will be prepared to discuss this with stakeholders at the workshop.
General			WRRRA: Work with Staff to develop a timeline that enables all concerned ample opportunity to review and evaluate GRC submissions		Staff will be prepared to discuss this with stakeholders at the workshop.
Commenter Acronyms	AU – Avista Corporation d/b/a Avista Utilities PSE – Puget Sound Energy PPL – Pacific Power and Light Company	ICNU – Industrial Customers of Northwest Utilities	SLG – Summit Law Group WRRRA – Washington Refuse & Recycling Association	WITA – Washington Independent Telecommunications Association	