

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PACIFICORP DBA PACIFIC POWER &  
LIGHT COMPANY,

2019 Commission Basis Report.

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PACIFICORP'S PETITION TO  
EXTEND THE DATE FOR FILING  
THE COMMISSION BASIS REPORT

**I. INTRODUCTION**

*1* In accordance with WAC 480-100-008, 480-07-110, and 480-07-370(3), PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company), petitions the Washington Utilities and Transportation Commission (Commission) for an exemption and extension of time to file the required Commission Basis Report required by WAC 480-100-257 for two weeks beyond the deadline. Due to the operational complexities of working remotely during the COVID-19 public health emergency, PacifiCorp is requesting that the deadline be extended from May 1, 2020, to May 15, 2020.

**II. BACKGROUND**

*2* PacifiCorp is an electric utility and public service company doing business in the state of Washington under RCW 80.04.010, and its public utility operations, retail rates, service, and accounting practices are subject to the Commission's jurisdiction. PacifiCorp provides retail electricity service under the name Pacific Power in Washington, Oregon, and California, and under the name Rocky Mountain Power in Idaho, Utah, and Wyoming. The Company's principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon, 97232.

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PacifiCorp’s name and address:

Washington Dockets  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[washingtondockets@pacificorp.com](mailto:washingtondockets@pacificorp.com)

Ajay Kumar  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[Ajay.kumar@pacificorp.com](mailto:Ajay.kumar@pacificorp.com)

In addition, PacifiCorp respectfully requests that all data requests be addressed to:

By e-mail (preferred)                    [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail                            Data Request Response Center  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

**III. THE BASIS FOR REQUESTING EXTENDED AMORITIZATION**

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Under RCW 80.04.080, PacifiCorp is required to make certain filings of annual reports, which include the Commission Basis Report, as described in WAC 480-100-257. The Commission basis report is required to be filed within four months of the end of the Company’s fiscal year.<sup>1</sup> Under RCW 80.04.080, the Commission may grant additional time for the filing of this report, and exemptions may be requested under WAC 480-100-008. The Commission’s standard for granting an exemption is articulated in WAC 480-07-110, which states that “[t]he commission uses the public interest standard to determine whether to grant an exemption from, or modification to, a commission rule.”<sup>2</sup>

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PacifiCorp’s fiscal year ended on December 31, 2019. By regulation, the Commission Basis report should be filed before May 1, 2020. Due to the operational

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<sup>1</sup> WAC 480-100-257(1).

<sup>2</sup> WAC 480-07-110 (2)(c).

complexities of working remotely during the COVID-19 public health emergency, PacifiCorp requests an alternative filing deadline of May 15, 2020, to file its 2019 Commission Basis report. This short extension is needed to allow sufficient time to process the data necessary to produce PacifiCorp's 2019 Results of Operations due to the complexities associated with working and reviewing the data with a very limited number of employees able to work on site and the rest working remotely.

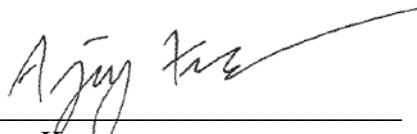
6           As a result, filing this report by May 1, 2020, would place an undue hardship on PacifiCorp and its employees. Granting this exemption is in the public interest. The requested exemption allows the additional time to complete PacifiCorp's 2019 Results of Operations, without risk of errors that would need to be corrected. Granting the waiver will reduce the risk of unnecessary administrative burden on both PacifiCorp and Commission Staff. Additionally, PacifiCorp has conferred with Commission Staff and they do not oppose this petition.

#### IV. CONCLUSION

7           PacifiCorp respectfully requests that the Commission issue an order finding PacifiCorp's petition in the public interest and granting an exemption for PacifiCorp to file its Commission Basis Report by May 15, 2020, instead of May 1, 2020.

Respectfully submitted this 20<sup>th</sup> day of April, 2020.

By:

  
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Ajay Kumar  
Senior Attorney, OSB #183903  
PacifiCorp