

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER &
LIGHT COMPANY

Petition for Modification to Actual
Results for Washington Operations Report
Requirements.

DOCKET UE-22_____

PACIFICORP'S PETITION FOR
MODIFICATION OF WAC 480-100-275

I. INTRODUCTION

1 PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or the Company)
per WAC 480-07-110 and WAC 480-100-008, petitions the Washington Utilities and
Transportation Commission (Commission) to grant a thirty-day extension of time to file
actual results for the Company's Washington operations beginning with the quarter
ending September 30, 2022, for five years, or until October 1, 2027.

2 PacifiCorp's name and address:

PacifiCorp Washington Dockets
825 NE Multnomah, Ste 2000
Portland, OR 97232
Washington.Dockets@PacifiCorp.com

Zachary Rogala
Senior Counsel
825 NE Multnomah, Ste 2000
Portland, OR 97232
Phone: 435.319.5010
Zachary.Rogala@pacificorp.com

II. PACIFICORP'S REQUEST

3 On June 21, 2007, the Commission issued Order No. 08 in combined dockets
UE-061546 & UE-060817, and approved PacifiCorp's West Control Area Inter-
Jurisdictional Allocation Methodology (WCA). Order 05 of docket UE-130043 continued
to require PacifiCorp to use the WCA.

4 To accurately implement the allocation methodology, PacifiCorp requested additional time to report results of actual Washington operations as required by WAC 480-100-275, for the quarter ending June 30, 2007. Order 01 in docket UE-071467 approved the Company's request.

5 PacifiCorp subsequently sought an indefinite thirty-day extension of time to file its actual results for Washington operations in docket UE-072123. Commission Order 01 granted the request, and allowed the Company to file actual results 90 days from the end of the quarter, for quarters ending September 30, 2007, through December 31, 2009.

6 PacifiCorp sought a similar extension in docket UE-072123. In Order 02, the Commission granted the request, allowing the Company to file actual results 90 days from the end of the quarter, through the quarter ending June 30, 2012. The Commission subsequently issued Order 03 that permitted the Company to file actual results 90 days from the end of the quarter for an additional five-year period through the period ending June 30, 2017, or until such time as the Commission adopts an alternative to the WCA.

7 PacifiCorp sought a similar extension in docket UE-170910. Commission Order 01 granted the request, and allowed the Company to file actual results 90 days from the end of the quarter, through the quarter ending October 1, 2022.

8 In docket UE-191024,¹ PacifiCorp's most recent general rate case, the Company requested Commission approval of the Washington Inter-Jurisdictional Allocation Methodology (WIJAM), a new interjurisdictional cost allocation methodology that replaces the WCA. The Company also requested approval of the 2020 Protocol, which is an agreement among the six states comprising the Company's service territory to

¹ *WUTC v. PacifiCorp d/b/a Pacific Power & Light Company*, Docket Nos. UE-191024, UE-190750, UE-190929, UE-190981, UE-180778 (cons.), Final Order 09 / 07 / 12 (Dec. 14, 2020).

collaborate in an attempt to develop a more comprehensive interjurisdictional cost allocation methodology. In Order 09/07/12, the Commission replaced the WCA with the WIJAM and 2020 Protocol.

9 The Company’s circumstances under the WIJAM remain unchanged from the three prior requests for circumstances under the WCA. Total-company data necessary to finalize the reporting of the actual results for Washington operations only becomes available within 60 days of the end of each quarter. The Company then needs adequate time to analyze and report WIJAM-specific data. To ensure that the reporting of actual results for Washington operations under the WIJAM allocation methodology is accurate, PacifiCorp requests the continuation of the thirty-day extension previously granted by the Commission. The Company requests that this modification be effective for a five-year period ending October 1, 2027.

10 The Commission may grant a modification of its rules “if consistent with the public interest, the purposes underlying the regulation, and applicable statutes.” WAC 480-07-110(1). PacifiCorp’s petition is consistent with these standards: the public interest and the purposes underlying the quarterly reporting requirements will be best served by granting the additional thirty-day extension to allow the accurate reporting of actual results for Washington operations under the WIJAM.

III. CONCLUSION

11 PacifiCorp respectfully requests a thirty-day extension of time to file actual results for Washington operations beginning with the quarter ending September 30, 2022, for five years, or until October 1, 2027.

DATED: this 14th day of October, 2022.

Respectfully submitted,

A handwritten signature in black ink, consisting of stylized initials 'ZR' with a long horizontal stroke extending to the right.

Zachary Rogala
Oregon Bar Number 222814
Senior Counsel
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Tel. (435) 319-5010
Email: Zachary.rogala@pacificorp.com