



October 31, 2000

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REGULATORY DEPARTMENT  
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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

RE: Docket UE-990473  
Comments to Proposed Rulemaking

Thank you for allowing PacifiCorp to provide the attached comments to the Small Business Economic Impact Statement Questionnaire regarding Docket UE -990473.

The Company's tariff and operating practices are modeled to mirror existing WAC Administrative Rules. The proposed rule changes add clarity to the current rules and generally follow current practice. However, there are some rule changes that will require additional processes and involve additional costs.

Informal inquiries may be directed to me at (503) 813-7408.

Very truly yours,

Carole Rockney, Manager  
Customer & Regulatory Liaison

Enclosures

C: Hank McIntosh, WUTC

Considering each revised or new rule now under consideration in Docket UE 990473:

1. Please identify by WAC number each draft rule that is consistent with your company's current operating practices.

Our current operating practices are generally consistent with the draft WAC rules. Some draft rules will require additional processes and workforce, as described below.

2. Please identify by WAC number each draft rule that will require modification of existing operating practices or adoption of a new operation practice. With respect to each such draft rule please provide your assessment of how it may affect your business.

WAC 480-100-046 (4) (b) "For service at a location where utility service facilities do not exist or require modification, the utility will provide the following service dates:

- (i) agreement, the utility must provide a range of dates by which service can be made available;
- (ii) Upon signing a service agreement with the applicant, the utility must provide a date by which service will be made available. If the utility becomes aware that the service date cannot be met, it must notify the applicant on or prior to the service date. Upon request by the applicant, prior to signing a service."

This rule may require additional manpower and preplanning. There may be other factors that impact our ability to meet this commitment, such as storms.

WAC 480-100-XXX8 "(a) Each affected customer must receive at least thirty days notice before the requested effective date when a utility proposes to:

- (i) Increase recurring monthly rates;
- (ii) Restrict access to services (e.g. discontinuing a service, limit access to service by imposing a new usage level on existing services);"

This rule will require extensive internal coordination to accomplish. It will also lengthen the regulatory process, require additional staff hours and result in added costs.

3. For each revised or new draft rule, please indicate the WAC number and provide a description or list of:

- (i) any cost savings the rule might promote,
- (ii) any new costs the rule might impose, and
- (iii) any non-monetary costs or benefits that might result from the rule.

- (i) The Company does not project any cost savings from the proposed rules.
- (ii) New costs will be incurred to comply with 480-100 XXX8. The additional costs will vary depending upon which method is used for notification.
- (iii) The Company does not project any non-monetary costs or benefits resulting from the proposed rules.

4. Estimate of benefits: For each new or revised rule described or listed in response to question number 3(i), please provide:
- (a) your best estimate of direct and indirect quantifiable benefits, and
  - (b) an assessment of how these benefits may change over time.
- Please note that the benefits may include a possible reduction in informal complaints, formal complaints, and litigation that might otherwise be experienced in the absence of the rule.

The rules have been rewritten to better clarify the intent which will improve customer understanding. PacifiCorp believes this is a benefit.

5. Estimate of costs: For each new or revised rule described or listed in response to the question number 3(ii), please provide your best estimate of quantifiable direct and indirect costs. If possible, these costs should be broken down into: capital costs (major investment such as production capital costs), operating and maintenance costs (further broken into sub-accounts which includes but not limited to human capital costs such as administrative and government, professional or consultants, laborers, etc., costs; operating cost; maintenance cost), and opportunity costs. Please identify each cost item as fixed, variable, average or incremental, state whether the costs are anticipated to be one-time costs or periodic costs (*e.g.*, monthly, cyclical, or annual). Please state each anticipated cost in appropriate units (*e.g.*, \$/yr, \$/hr, \$/customer, \$/kW, \$/kWH).

No such analysis has been completed. On WAC 480-100-XX8, the additional cost would depend upon the method used to notify customers but would range from \$1,200 for a small newspaper ad up to \$55,000 for direct mail for each notification required.

6. For each estimate of benefits and costs (in 4 and 5 above), please describe the data and methodology used for the calculations, citing any engineering cost estimating manual or other guidelines used to prepare your estimates.

N/A

Non-monetary costs or benefits: For each new or revised rule described or listed in response to the question number 3(iii), please provide a narrative description of the nature of the cost and/or benefit and its anticipated impact on your company.

See above.

7. For each estimate of benefits and costs, please indicate the annual frequency or number of times that customers from each service class (residential, commercial, and industrial) may utilize each rule in order to assess the expected annual cost per customer per rule.

The Company is unable to predict the frequency of times each customer may utilize each rule. We anticipate the frequency would be high.