

December 1, 2017

VIA ELECTRONIC FILING

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

RE: Docket A-130355—Pacific Power & Light Company’s Comments

In response to the Notice of Opportunity to File Written Comments issued by the Washington Utilities and Transportation Commission (Commission) on October 16, 2017, Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits the following written comments on the draft rules for WAC Chapter 480-07.

(1) WAC-480-07-510 (5)(c): Cost Models

The proposed language requires the utility to provide a copy of models used for cost studies that will enable the commission to verify and modify the model’s inputs and assumptions. Pacific Power notes that some models may be non-utility proprietary; they may require users to purchase a license or have other limitations on distributions. Pacific Power recommends including language acknowledging this possibility. See suggested language below.

(5) Cost studies. The company’s initial submission must (a) include any cost studies the company performed or relied on to prepare its proposals; (b) identify all cost studies conducted in the last five years for any of the company’s services; and (c) describe the methodology the company used in all such cost studies. If the cost studies are in the form of a non-proprietary model, the company must provide a copy of that model that will enable the commission to verify and modify the model’s inputs and assumptions.

(2) WAC-480-07-510: Paper Copies

The proposed language requires the utility to submit five paper copies of all “testimony and exhibits” the next business day. Generally speaking, Pacific Power does not object to the rule regarding printing copies. The rule, however, does not contemplate circumstances where an exhibit is either voluminous or cannot easily be printed.

Pacific Power recommends including an exemption to the printing requirement if the exhibit (1) exceeds 100 pages; or (2) contains large amounts of data calculations that would result in the exhibit having little value if printed (e.g., document cannot be formatted for printing).

If a document meets either of those criteria, the submitting party would insert a placeholder for the exhibit that includes the file name of the electronic document. This would allow reviewers to easily look up the electronic file.

(3) WAC 480-07-510(2): Tariff Sheets

The rule states that new or revised tariffs submitted should be in legislative format and addresses the deletion and insertion of language in the proposed sheets. Pacific Power notes that the proposed rule does not address situations where language is moved from one tariff sheet to another without substantive change. Currently, if text is moved between sheets, it will show as a deletion on the page it has been moved from, and as an insertion on the page it has moved to. This could be confusing to individuals reviewing the document, because it would not be readily apparent that existing language was simply moved (as compared to new substantive changes to the tariff language). It would be helpful if Staff could provide some guidance on how they would like to see these changes marked.

(4) WAC 480-07-510(3)(d): Workpapers and Accounting Adjustments – Electronic Documents and Confidentiality

The proposed language states parties can submit information with locked, hidden, or password protected cells if necessary to restrict the data from public disclosure. Such information, however, must be identified and designated as confidential or protected from public disclosure in accordance with WAC 480-07-160.

The proposed language appears to require additional identification or designation of the confidential/protected information, but is unclear how a locked, hidden, or password protected cell should be designated. Pacific Power would appreciate clarification from Staff on its expectations around these types of designations.

Pacific Power appreciates the Commission's efforts to update and clarify its procedural rules, as well as the opportunity to participate in the process. Please direct inquiries to Jason Hoffman, Regulatory Projects Manager, at (503) 331-4474.

Sincerely,

_____/s/
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