

August 1, 2018

VIA ELECTRONIC FILING

Mark L. Johnson
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 on July 2, 2018, Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, submits the following written comments on the draft rules for WAC Chapter 480-07.

WAC 480-07-510(5)(a)(viii)

In response to comments from Public Counsel, the proposed rules require utilities to provide the actual rate of return and actual rate of return on common equity in the summary document that is filed with the initial filing of a general rate case. Pacific Power supports this addition to the summary document, but recommends clarifying the proposed wording. The most recently calculated actual rate of return is the one calculated for the test period that the rate case is based on. However, the words “most recently calculated” can be interpreted to mean the most recent commission basis report or other previous filing with the Commission.

Pacific Power proposes the clarifying language below:

(viii) ~~Most recently calculated a~~Actual rate of return and actual rate of return on common equity for the test period.

WAC 480-07-740—Settlement consideration procedure.

While the additional timing requirements do present an additional hurdle for reaching settlement in a case, Pacific Power appreciates the fact that the Commission needs adequate time to fully consider a settlement agreement or other actions resolving the issues in a rate case.

Pacific Power has just one recommendation to clarify the requirement to notify the commission whether the company can extend the statutory deadline. The language in subsection (2)(d) should be clarified to state that the extension of statutory deadlines applies only in situations where those timelines described in subsections (2)(a) or (b) have not been met. If the settlement occurs before the deadlines described in (a) and (b), the extension of statutory deadline would not be necessary.

Pacific Power proposes the clarifying language below:

(d) *Extension of statutory deadline.* When requesting to suspend the procedural schedule for commission consideration of a settlement agreement that does not meet the requirements in subsections (a) or (b) in general rate proceedings or other proceedings in which a statute requires final commission action within a specified time period, the party that submitted the suspended tariff or other initial filing at issue must inform the commission whether the party agrees to extend the statutory deadline, if necessary, to add the amount of time the commission requires to consider the settlement and take final action in the proceeding.

Pacific Power is very appreciative of the Commission's efforts to update and clarify its procedural rules, and looks forward to continuing its participation through comments and future workshops. Please direct any inquiries regarding this filing to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

 /s/

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