

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION
COMMISSION,

Complainant,

v.

PACIFICORP, d/b/a PACIFIC
POWER & LIGHT COMPANY,

Respondent.

DOCKET UE-210829

OFFER OF PUBLIC COMMENT
EXHIBIT

BENCH REQUEST NO. 1

- I.* The Public Counsel Unit of the Washington Attorney General’s Office (Public Counsel) hereby offers this Public Comment Exhibit Bench Request No. 1 (BR-1) for admission into the record for this proceeding in Docket UE-210829 concerning the Clean Energy Implementation Plan (CEIP) proposed by PacifiCorp, d/b/a Pacific Power & Light Company (PacifiCorp or Company). On August 29, 2023, the Washington Utilities and Transportation Commission (UTC or Commission) issued a Notice of Virtual Public Comment Hearing (Notice), which the Commission revised on September 1, 2023, to clarify the Public Comment Hearing time and date of 6 p.m. on September 28, 2023.¹ The Commission and Public Counsel both received and compiled remarks from customers in response to the Notice.² Customers either provided comments to Public Counsel via phone calls and emails or provided comments to the Commission through the UTC’s online comment web portal.

¹ Commission Notice of Virtual Public Comment Hearing (filed Aug. 29, 2023); Commission Notice of Errata (filed Sept. 1, 2023).

² PacifiCorp’s Customer Notification of Public Comment hearing (filed Sept. 1, 2023).

2. Public Comment Exhibit No. BR-1. The Commission Consumer Protection and Communications Staff documented these customer comments in a database matrix. The output from this database is included in .pdf format as Attachment 1 to this exhibit,³ and this file provides all comments submitted to the Commission. Public Counsel also received four phone calls and two written comments. These comments are included in Attachment 2.⁴ Ms. Rathburn submitted comments to Public Counsel via written letter and also left a voicemail. Both of Ms. Rathburn's comments are left in Attachment 2 for the totality of evidence.⁵

3. The database matrix in Attachment 1 contains all comments submitted to the Commission through their online web portal in response to the Notice up to October 5, 2023. The date of October 5, 2023, was the final date to submit comments in this Docket set by the Commission at the September 28, 2023, Public Comment Hearing.⁶ The Commission provided the output shown in Attachment 1 to Public Counsel on October 12, 2023.

4. Although the CEIP does not propose a rate increase, many of the comments opposing the CEIP discuss rates and the prospect of rates increasing as a result of the CEIP. The commenters discussing rates do not identify any pending requests by PacifiCorp for rate adjustment, but discuss the possibility of future rate increases that may or may not arise from or reference activities discussed in the CEIP. The submitted material has been counted as follows:

a. Comments received by WUTC

Opposing CEIP approval	19
Supporting CEIP approval	0
Undecided comments	5

b. Comments received by Public Counsel

³ See UTC Comment Matrix, Attachment 1 (UTC Cmt Matrix).

⁴ See Public Counsel's Phone and Written Letter Comments, Attachment 2 (PC Phone Written Cmts).

⁵ Ms. Rathburn submitted comments to Public Counsel twice, however only one tally has been entered to the total amount of comment received by Public Counsel referenced in paragraph 4.

⁶ See Recording of Public Comment Hearing (filed Sept. 28, 2023). At the Public Comment Hearing the Commission ruled the filing date for this Exhibit to be October 20, 2023.

Opposing CEIP approval	4
Supporting CEIP approval	1
Undecided Comments	0

5. Public Counsel submits 29 total public comments in the exhibit. Of these, 23 oppose the UTC's approval of PacifiCorp's CEIP and one (1) supports it. Five (5) neither oppose nor support the UTC's approval of PacifiCorp's CEIP. We only count each commenter once, and this is reflected in the total number of submitted comments.

DATED at Seattle, Washington this 20th day of October, 2023.

ROBERT W. FERGUSON
Attorney General

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/s/ _____
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