

Date: January 14, 2000
To: Graciela Etchart
From: Carole Rockney - PacifiCorp
Subject: Additional Comments on Proposed Washington Rule Changes - Rules
480-90 & 100

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STATE OF WASH.
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Graciela,

PacifiCorp has some additional comments on the discussion draft of Electric Operation Rules in Docket UE-990473, which are shown below. Thank you for considering them. Let me know if you have any questions. See you soon.

ACCOUNTING RULES

WAC 480-100-xx6

Under (1) Annual Report section (a) it is proposed that the annual report be filed by May 1 of each year. PacifiCorp is currently converting from a calendar to a fiscal year ending March 31 and anticipates filing the FERC Form 1 on a fiscal year basis. The Company suggests that the proposed wording "Utilities must send the annual report for the preceding calendar year by May 1 of each year" be changed to "Utilities must send the annual report within four months of the end of a utility's fiscal year." This language is consistent with that used in section (2)(c) relating to Commission basis reports.

Section (3) directs the utility to file quarterly reports which contain the prior 3 months monthly information as well as 12 months ending balances. PacifiCorp questions whether these reports are necessary. Un-normalized information is subject to significant month-to-month variations relating to weather, hydro conditions, thermal generation, market conditions and other influences. The Company suggests that if monthly information is determined to have value that only those specific elements that are of interest to the Commission be reported.

RMS / FOB