

Filing Title	Company	Docket/Order	Source	Frequency	Purpose/ information provided	Staff Recommendation	Staff Notes	Company Position	Company rationale for recommended position	Staff Response to Company	PC Position	Rationale	Staff Response to PC	NWEC Position	Rationale	Staff Response to NWEC	TEP Position	
REQUIRED BY ORDER																		
Annual Report of Permanent Disconnections and Removal of Facilities	PacifiCorp	UE-001734, 8th Suppl. Order (approving Modified Tariff Proposal at 30, ¶95)	The 8th Suppl Order at 7, ¶122-23 (ref. McIntosh Ex. 301-T at 8:8-13) identifies that this reporting requirement is a condition of the Modified Tariff Proposal	Annual	Annual report of customer requests to permanently disconnect from company facilities to switch to another electric utility. Includes info on cost of removal.	Remove	This report is required only for PacifiCorp, and the information provided in the report does not appear to be used for anything. Parties can request this information in a general rate case proceeding, if needed.	Remove	PacifiCorp recommends removing this reporting requirement to reduce administrative burden. The Commission could request this information from the Company on an as-needed basis.									
Environmental Remediation Costs/ Deferrals Reports	PacifiCorp	UE-031658, Order 03 at 3, ¶11 (modifying reporting frequency to annual on 8/30/2018)	UE-031658, Order 01 at ¶13 via ¶20 (establishing semi-annual reporting frequency)	Annual	Provides detail of environmental remediation costs/ deferrals, project status summaries	Remove	While this information is useful within the context of a request for cost recovery, it is not useful as standalone reporting requirement. As indicated in Order 01 at ¶4 and ¶21, Pacific seeks recovery of these deferred expenses in rate proceedings, which is the appropriate venue for evaluating the prudence of the costs and appropriateness for rate recovery. It is unnecessary to review remediation expenditures outside of a request for cost recovery. A similar reporting requirement was eliminated for PSE per Order adopting Settlement in UE-220066/UG-220067.	Maintain		Although PacifiCorp provided no rationale for Staff to respond to, Staff assumes PacifiCorp's "maintain" position is related to the fact that the commission relatively recently (in Aug 2018) granted PacifiCorp's motion to revise the frequency of this report from semi-annual to annual (see UE-031658, Order 03 at 3, ¶11). However, Staff's position is that even an annual filing is unnecessary as neither the Commission nor Commission Staff reviews utility remediation expenditures outside of a request for cost recovery.								
Pipeline Replacement Plan	NWN	UG-120715 (Policy Statement) at ¶43		Biennial	Plan for Accelerated Replacement Pipeline Facilities with Elevated Risk (per commission policy).	Remove	Unnecessary for NWN to be required to file this report as the company does not have high-risk pipe or a CRM. Policy statement should be amended to state that only utilities with high-risk pipe are required to file Pipeline Replacement Plans.	Remove	If a gas utility does not have a CRM, reconsider whether this report is necessary. NW Natural does not have at-risk pipeline in the Washington service territory.		Remove	Agrees with removing because NW Natural does not have at-risk pipe.		Other	If NWN doesn't have any plans to replace pipeline in WA, they should not be required to file this report.	The Commission policy statement is specific to high-risk pipe, and NWN does not have high risk pipe.		
Pipeline Replacement CRM - Tariff Revision	Cascade	UG-120715 (Policy Statement) at ¶69 (establishing timing of CRM tariff revisions, including multiple updates for each tariff revision)		Annual (+2 updates)	Annual CRM tariff revision. The policy statement requires companies to update actual and projected costs twice between the filing date and the effective date of the revised tariff. Initial filing June 1, First update Sept. (concurrent with PGA), Second update Oct.	Change Frequency (eliminate updates)	Maintain initial filing but eliminate required updates. Updates are administratively burdensome and unnecessary given that the CRM includes a retrospective true-up function. The requirement to file updates was eliminated for PSE per Order adopting Settlement in UE-220066/UG-220067.	Change Frequency	3 filings per year per Policy Statement. Recommend changing to one filing per year and treat similarly to Sch 120 which includes 3 months of estimates that get true-up each following year.		Maintain?	PC did not provide a rationale to respond to						
Quarterly PCA Report	PSE	UE-130617, Order 11 (approving Settlement at ¶1, 38-39)	Settlement Stipulation Attachment A at 2, item 3.c.	Quarterly	Quarterly report detailing the power cost deferral calculation. This report is in addition to the annual PCA report.	Change Frequency (to annual)	Maintain annual report but eliminate quarterly reporting requirement. Quarterly filings reporting PCA deferrals are excessive and unnecessary given that the information is not used until the annual deferral review. Annual reporting is sufficient.	Change Frequency	Could make one filing per year with YTD June information since the annual report will contain the annual amounts as of December each year.		Maintain	Avista suggests maintaining quarterly filings. Consistency in reporting would be beneficial. Quarterly is sufficient.	To maintain consistency, Staff is recommending an annual filing cadence for all utilities. Quarterly reporting is unnecessary as the same information is provided in the annual reports					
Monthly ERM Deferral Report	Avista	UE-011595, 5th Suppl. Order (approving Settlement at 22, ¶67)	Settlement Stipulation at 6, 4.a.	Monthly	Monthly report detailing the power cost/ ERM deferral calculation	Change Frequency (to annual)	Maintain annual report but eliminate monthly reporting requirement. Monthly filings reporting ERM deferrals are excessive and unnecessary given that the	Change Frequency	Maintain annual filing cadence. Reduce the monthly requirement to quarterly to reduce administrative burden on both the									
Decoupling Mechanism Quarterly Report	Avista	UE-140188 UG-140189 Order 05 (approving Settlement at 24, ¶74). Settlement attached as Appendix A to Order 05	Ehrbar PBE-1T, The Settlement adopted Avista's decoupling proposal which included quarterly reporting, as discussed in PBE-1T at 67-12-16 and 73-8-9.	Quarterly	Quarterly reports for WA Electric and Natural Gas Decoupling mechanisms.	Change Frequency (to annual)	Maintain annual report but eliminate quarterly reporting requirement. Quarterly reporting is excessive and unnecessary given that the information is not used until the annual decoupling review. Annual reporting is sufficient. Note: neither the order nor the Settlement Stipulation identifies a quarterly reporting requirement. Quarterly reporting proposed in PDE-1T (see pp. 67 and 73), and implicitly required by the Settlement which was based on Avista's decoupling proposal (with specified modifications).	Maintain		No rationale provided to respond to								
INFORMAL STAFF REQUESTS (NOT REQUIRED BY COMMISSION)																		
Electric line extension cost study information filing	PSE	UE-150200 (NOT REQUIRED BY ORDER)	Informal agreement with Staff (see Staff 8/13/15 Open Meeting Memo). See also Informal 2003 collaborative agreement in UE-031215 UG-031216.	Bi-Annual	Electric Line Extension Costs Studies at a minimum every two years starting 2019. These studies will cover a 12-month period.	Remove - via Staff Letter	This is not explicitly required by commission order. The line extension cost study appears to originate from an informal collaborative agreement from 2003 (031215/6), and it was modified to a biennial cost study based on another informal agreement with Staff in 2015 (see open meeting memo, docket 150200). Staff provides notice here that it intends to file a letter to UE-150200 stating that Staff no longer asks that PSE separately file and docket this study; rather the company can simply provide it as a component of its line extension tariff revisions.	Maintain		No rationale provided to respond to. Also, this filing is not required by order.								
Line Extension Data Update	Cascade	UG-160967 (NOT REQUIRED BY ORDER)	Informal Staff request, no source document	Bi-Annual	Staff requested line extension data updates.	Remove - via Staff Letter	This filing is not required by order, and it does not appear to be referenced in any document filed in UG-160967. This is information can be requested by Staff if it is needed. Staff provides notice here that it intends to file a letter to UG-160967 stating that Staff no longer requests that Cascade file this information.	Change Frequency	Should treat like line extensions since the information doesn't change that often.	This filing is not required by order				Maintain	It is important for the UTC and the public to understand the impacts of gas line extension policies. This information is not available elsewhere.	There is no filing requirement for the Commission to maintain here		