

BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT COMPANY,

Respondent.

DOCKET UE-130043

COMMISSION STAFF RESPONSE  
TO PACIFICORP'S MOTION TO  
WITHDRAW TARIFF

1           On July 11, 2013, PacifiCorp d/b/a Pacific Power & Light Company (“Company”) filed with the Washington Utilities and Transportation Commission (Commission) a request for an order approving the withdrawal of the proposed revisions to Schedule 300, *Charges as Defined by the Rules and Regulations*, and Rule 6, *General Rules and Regulations*, and terminating further litigation related to Schedule 300 and Rule 6 in this case. The Company states that withdrawing these tariff revisions will allow it to gather additional data and analysis regarding the costs of Schedule 300/Rule 6 services that will inform future revisions to the tariffs.

2           Commission Staff has no objection to the Company’s motion. The motion responds to criticisms from Public Counsel and The Energy Project regarding the proposed revisions to service reconnection fees. Staff is amenable to the Company addressing those concerns

despite Staff's own readiness in this case to proceed on Schedule 300/Rule 6 issues. It would also be inefficient to address in this case issues raised by the Columbia Rural Electric Association ("CREA") regarding fees for permanent disconnection of electric facilities that are part of the same tariff that also concern Public Counsel and The Energy Project.

3           Staff does not discount the concerns of CREA regarding permanent disconnection fees. However, any customer that believes the Company has violated the current net removal tariff or wishes to challenge the rates, terms and conditions of the existing tariff, may bring a complaint before the Commission to litigate those issues.<sup>1</sup> This rate case is not the sole avenue to address those issues.

4           Finally, if the Company's motion is granted, the following sections of Staff witness Christopher Mickelson's testimony and exhibits, filed June 21, 2013, will be unnecessary and not offered into evidence:

- Exhibit No. \_\_ T (CTM-1T), page 3, lines 5-7.
- Exhibit No. \_\_ T (CTM-1T), page 6, lines 1-21.
- Exhibit No. \_\_ T (CTM-1T), page 7, line 19 through page 9, line 6.
- Exhibit No. \_\_ T (CTM-1T), page 42, line 8 through page 43, line 19.
- Exhibit Nos. \_\_\_\_ (CTM-2), \_\_\_\_ (CTM-7), and \_\_\_\_ (CTM-8).

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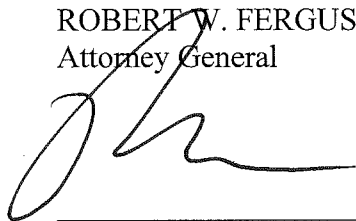
<sup>1</sup> RCW 80.04.110, RCW 80.04.220 and RCW 80.28.020. Indeed, such a complaint could have been filed and resolved before the current rate case was filed.

In addition, pro forma adjustment 3.8, Schedule 300 Fee Charges, would be rendered moot if the motion is granted. Staff anticipates seeking permission to file brief supplemental testimony explaining the impact of that change on Staff's overall revenue requirement recommendation.<sup>2</sup>

DATED this 18<sup>th</sup> day of July 2013.

Respectfully submitted,

ROBERT W. FERGUSON  
Attorney General



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ROBERT D. CEDARBAUM  
Assistant Attorney General  
Counsel for Washington Utilities and  
Transportation Commission Staff

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<sup>2</sup> Staff's supplemental testimony will also address an unrelated error in the residential monthly basic charge discovered recently by Staff. We will seek permission to file that testimony even if the pending Company motion is denied.