



# ATTORNEY GENERAL OF WASHINGTON

800 Fifth Avenue #2000 • Seattle WA 98104-3188

July 18, 2013

**SENT VIA ELECTRONICALLY & ABC LMI**

Steven V. King  
Acting Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P. O. Box 47250  
Olympia, Washington 98504-7250

RE: WUTC v. PacifiCorp  
Docket UE-130043

Dear Mr. King:

Enclosed for filing in the above-referenced docket is Public Counsel's Response to PacifiCorp's Motion to Withdraw Tariff Filing. An Original and 13 copies are being provided.

An electronic copy of this filing has been provided to the Records Center and all parties listed on the current service list. Please contact the undersigned if you have any questions or concerns regarding this matter.

Sincerely,

LISA W. GAFKEN  
Assistant Attorney General

LWG:ar

Enclosures

cc: Parties (E-mail and First Class Mail)

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP D/B/A PACIFIC POWER  
& LIGHT COMPANY,

Respondent.

DOCKET UE-130043

PUBLIC COUNSEL'S RESPONSE  
TO PACIFICORP'S MOTION TO  
WITHDRAW TARIFF FILING

1 Pursuant to the Commission's Notice Setting Time for Filing Responses to Motion to  
Withdraw Tariff Filing, dated July 12, 2013, Public Counsel submits the following Response.

2 PacifiCorp, in its Motion to Withdraw Tariff Filing, requests that it be permitted to  
withdraw certain testimony associated with proposed changes to its Schedule 300 and Rule 6.  
The Company states that it proposes withdrawing these tariff revisions so it can gather additional  
data and analysis demonstrating actual costs of Schedule 300/Rule 6 services to inform future  
revisions to tariffs. PacifiCorp conditions its withdrawal on the termination of all litigation in  
this matter on issues related to Schedule 300 and Rule 6. In particular, PacifiCorp requests that  
issues raised by Columbia REA be considered in another proceeding to be filed at an undefined  
future time.

3 Public Counsel does not object to PacifiCorp's withdrawal of the proposed changes to  
Schedule 300 and Rule 6. Public Counsel opposed all Company-proposed modifications to  
Schedule 300 fees on the basis that the Company had not supported its request with evidence in

the record on the actual costs associated with these fees.<sup>1</sup> Thus, withdrawing the proposed changes produces a result that is consistent with Public Counsel's recommendation.

4 Public Counsel would also not be opposed to the Commission considering the issues raised by Columbia REA in this docket, but we would urge that issues relating to reconnection fees and unauthorized reconnection / tampering be dismissed pursuant to PacifiCorp's request. If the issues raised by Columbia REA are to be heard in a separate proceeding, it would be beneficial to have an anticipated timeframe for PacifiCorp's information gathering initiative and for filing of its proposed Schedule 300 changes.

5 Dated this 18<sup>th</sup> day of July, 2013.

ROBERT W. FERGUSON  
Attorney General



Lisa W. Gafken  
Assistant Attorney General  
for Public Counsel

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<sup>1</sup> Testimony of Ms. Daeschel, Exhibit No. LD-1T.  
PUBLIC COUNSEL'S RESPONSE TO  
PACIFICORP'S MOTION TO  
WITHDRAW TARIFF FILING

**Docket UE-130043  
PACIFICORP GRC 2013**

I hereby certify that a true and correct copy of *Public Counsel's Response to PacifiCorp's Motion to Withdraw Tariff Filing* was sent to each of the parties of record shown below in sealed envelopes, via: U.S. Mail and E-Mail.

**SERVICE LIST**

**\*\* = Receive Highly Confidential**

**\* = Receive Confidential**

**NC = Receive Non-Confidential**

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DATED: July 18, 2013.



Annya Ritchie  
Legal Assistant