

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFIC POWER & LIGHT
COMPANY, a division of PacifiCorp

Petition for Modification to Actual
Results for Washington Operations Report
Requirements.

DOCKET UE-170910

PACIFIC POWER'S REVISED
PETITION FOR MODIFICATION OF
WAC 480-100-275 REQUIREMENTS

1. Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, per WAC 480-07-110 and WAC 480-100-008, petitions the Washington Utilities and Transportation Commission (Commission) for modification of the actual results for Washington operations report filing requirements contained in WAC 480-100-275.

2. Pacific Power's name and address:

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3. On June 21, 2007, the Commission issued Order No. 08 in Docket Nos. UE-061546 & UE-060817 (combined), approving Pacific Power's West Control Area (WCA) inter-jurisdictional allocation methodology, with modifications. In Docket No. UE-130043, Order No. 05, the Commission required Pacific Power to continue to use the WCA inter-jurisdictional allocation methodology.

4. To accurately implement the new allocation methodology, Pacific Power requested additional time to report actual results for the quarter ending June 30, 2007.

WAC 480-100-275 requires electric utilities to file actual results of Washington operations within 60 days of the end of each quarter. Pacific Power requires additional time to implement the requirements of the WCA inter-jurisdictional allocation methodology. The Commission originally approved Pacific Power's request for the waiver of WAC 480-100-275 in Order No. 01 in Docket No. UE-071467.

5. On October 31, 2007, Pacific Power submitted a petition for modification of the filing requirements contained in WAC 480-100-275 in Docket No. UE-072123, seeking an indefinite thirty-day extension of time to file its actual results for Washington operations. In that Petition, the company also requested that the thirty-day extension be applied to its report on environmental remediation expenditures. In Order No. 01, the Commission granted the requested modification, allowing Pacific Power to file its actual results for Washington operations reports 90 days from the end of the quarter for the quarters ending September 30, 2007, through December 31, 2009. Order No. 01 also allowed the company to file its environmental remediation expenditures every other quarter with the actual results of operations reports.

6. On March 23, 2010, in Docket No. UE-072123, Pacific Power submitted an additional petition for modification of the filing requirements contained in WAC 480-100-275, requesting that the thirty-day extension for reporting its actual results for Washington operations be effective through the five-year trial period of the WCA inter-jurisdictional allocation methodology. In Order No. 02, the Commission granted the requested modification, allowing Pacific Power to file its actual results for Washington operations reports 90 days from the end of the quarter through the quarter ending June 30,

2012. Order No. 02 also allowed Pacific Power to file its environmental remediation expenditures every other quarter with the actual results of operations reports.

7. On September 27, 2012, the Commission issued Order No. 03, granting Pacific Power's request to extend the modification of WAC 480-100-275, allowing the company to file its quarterly actual results of operations reports 90 days from the end of the quarter for an additional five-year period through the period ending June 30, 2017, or until such time as the Commission adopts an alternative to the WCA inter-jurisdictional allocation methodology.

8. Pacific Power believes that in Order No. 03, the Commission granted the requested waiver for the period that Pacific Power's WCA inter-jurisdictional allocation methodology is in effect. However, out of an abundance of caution, Pacific Power is filing this request for modification of the requirements contained in WAC 480-100-275.

9. The company's circumstances remain unchanged from the prior requests for modification of the requirements contained in WAC 480-100-275. The total-company data necessary to finalize the reporting of the actual results for Washington operations becomes available within 60 days of the end of the quarter. This data then needs to be analyzed to determine the data related only to Pacific Power's WCA inter-jurisdictional allocation methodology. To ensure that the reporting of actual results for Washington operations under the WCA allocation methodology is accurate, Pacific Power requests a continuation of the thirty-day extension previously granted by the Commission. The company requests that this modification be effective for five years, or until October 1, 2022.

10. Additionally, Pacific Power includes a report of environmental remediation expenditures on a semi-annual basis as part of the quarterly results of operations filing, per Order No. 01 in Docket No. UE-031658. For procedural efficiency and to reduce administrative burden, Pacific Power also requests that the environmental remediation expenditures report continue to be provided with the quarterly results reports and that the thirty-day extension also be applied. The Commission previously granted similar requests in Order Nos. 01, 02, and 03 in Docket UE-072123.

11. The Commission may grant a modification of its rules “if consistent with the public interest, the purposes underlying the regulation, and applicable statutes.” WAC 480-07-110(1). Pacific Power’s petition is consistent with these standards. The public interest and the purposes underlying the quarterly reporting requirements will be best served by granting the additional thirty-day extension to allow the accurate reporting of actual results for Washington operations under the WCA inter-jurisdictional allocation methodology.

12. Pacific Power respectfully requests a thirty-day extension of time in which to file its actual results for Washington operations report, beginning with the quarter ending June 30, 2017, for five years, or until October 1, 2022. The company also requests that the thirty-day extension be applied to the semi-annual environmental remediation expenditures report for the same time period.

DATED: this 19th day of September, 2017.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Matthew McVee', written over a horizontal line.

Matthew McVee
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