

December 1, 2017

**VIA ELECTRONIC FILING**

 Steven V. King  
 Executive Director and Secretary  
 Washington Utilities and Transportation Commission  
 1300 S. Evergreen Park Drive S.W.  
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 Olympia, WA 98504-7250

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 UTIL. AND TRANSP.  
 COMMISSION

**RE: Advice No. 17-10—Rule 1-General Rules and Regulations-Definitions, Rule 4-Application for Electric Service, Rule 6-Facilities on Customer’s Premises, and Schedule 300-Charges as Defined by the Rules and Regulations**

Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits the following proposed tariff sheets in compliance with Order 06 in UE-161204, and in accordance with RCW 80-28-050 and WAC chapter 480-80. Per WAC 480-07-883, the Commission’s final order requiring a compliance filing will include the effective date for tariff sheets required as part of the compliance filing. No effective date was prescribed in Order 06 or Order 08 for the tariff revisions, therefore the Company respectfully requests an effective date of January 1, 2018.

First Revision to Sheet No. R1.1	Rule 1	General Rules and Regulations - Definitions
Third Revision to Sheet No. R1.2	Rule 1	General Rules and Regulations - Definitions
Second Revision to Sheet No. R1.3	Rule 1	General Rules and Regulations - Definitions
Second Revision to Sheet No. R4.2	Rule 4	General Rules and Regulations – Application for Electric Service
Second Revision to Sheet No. R6.2	Rule 6	General Rules and Regulations – Facilities on Customer’s Premises
First Revision to Sheet No. R6.3	Rule 6	General Rules and Regulations – Facilities on Customer’s Premises
Original Sheet No. R6.4	Rule 6	General Rules and Regulations – Facilities on Customer’s Premises
Original Sheet No. R6.5	Rule 6	General Rules and Regulations – Facilities on Customer’s Premises
Third Revision to Sheet No. 300.1	Schedule 300	Charges as Defined by the Rules and Regulations
Third Revision to Sheet No. 300.2	Schedule 300	Charges as Defined by the Rules and Regulations
Second Revision to Sheet No. 300.3	Schedule 300	Charges as Defined by the Rules and Regulations

Pacific Power makes this filing in compliance with Order No. 6, Docket No. UE-161204 (Oct. 12, 2017) (the Order). Pacific Power initiated this proceeding to clarify existing tariff rules governing permanent disconnections from its system. The revisions were needed to address a long-standing, and continuing problem, in portions of Pacific Power's Washington service territory that are not governed by a territory allocation agreement with neighboring utilities.

In the Order, the Commission accepted in part, and denied in part, Pacific Power's requested tariff revisions. The Commission instructed Pacific Power to work cooperatively with Commission Staff and intervenors on two specific issues: (1) procedures for resolving disputes between Pacific Power and departing customers over stranded cost recovery fees; and (2) language governing decommissioning electric facilities in place when removing them would cause operational or safety issues.

Pacific Power, Commission Staff, and intervenors in the docket worked cooperatively to address the two issues identified by the Commission. The parties exchanged numerous drafts and participated in multiple conference calls in an effort to resolve disagreements and minimize contested issues in this compliance filing. As a result, the parties resolved many of the contested issues, and the rules in this compliance filing reflect compromise on the part of all parties. Pacific Power appreciates the thoughtful comments provided by Staff and intervenors.

There are, however, certain issues that remain unresolved. For example, Staff has taken the position that every stranded cost recovery fee must be submitted to the Commission for review and approval. Pacific Power disagrees that the Order compels that result, and has proposed a construct where stranded cost recovery fees for large departing customers (1 MW and greater) will be submitted to the Commission for review and approval. While the parties agree on the general contours of the dispute resolution provisions, there are some disagreements over the finer points of the procedures.

Another disputed issue involves the proposed language governing decommissioning facilities in place. Columbia Rural Electric Association believes that there are no circumstances where a customer would not either purchase, or seek to have the facilities removed at the customer's expense. Pacific Power disagrees and believes that the rules should provide the utility with flexibility to address circumstances that present operational or safety issues.

Pacific Power understands that Staff and intervenors will provide comments to the Commission specifying their concerns with the compliance filing. Pacific Power reserves the right to respond to any such comments.

It is respectfully requested that all formal correspondence and requests regarding this filing be addressed to:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah St., Suite 2000  
Portland, Oregon, 97232

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Please direct any informal inquiries regarding this filing to Jason Hoffman, Regulatory Project Manager, at (503) 331-4474.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
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Etta Lockey

Vice President, Regulation

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Enclosures

NEW-PPL-Advice-17-10-UE161204-Cply-Attach-A-Trf-Summary-12-1-17.pdf

NEW-PPL-Advice-17-10-UE161204-Cply-Attach-B-Revised-Trf-12-1-17.pdf

NEW-PPL-COS-UE161204-12-1-17.pdf

cc: Service List in Docket UE-161204

The proposed tariff sheet to be revised in Pacific Power and Light Company's currently effective Tariff WN U-75 are designated as follows:

First Revision to Sheet No. R1.1	Rule 1	General Rules and Regulations - Definitions
Third Revision to Sheet No. R1.2	Rule 1	General Rules and Regulations - Definitions
First Revision to Sheet No. R1.3	Rule 1	General Rules and Regulations - Definitions
Second Revision to Sheet No. R4.2	Rule 4	General Rules and Regulations – Application for Electric Service
Second Revision to Sheet No. R6.2	Rule 6	General Rules and Regulations – Facilities on Customer's Premises
First Revision to Sheet No. R6.3	Rule 6	General Rules and Regulations – Facilities on Customer's Premises
Original Sheet No. R6.4	Rule 6	General Rules and Regulations – Facilities on Customer's Premises
Original Sheet No. R6.5	Rule 6	General Rules and Regulations – Facilities on Customer's Premises
Third Revision to Sheet No. 300.1	Schedule 300	Charges as Defined by the Rules and Regulations
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