

May 1, 2014

***VIA ELECTRONIC FILING  
AND COURIER DELIVERY***

Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

Attention: Steven V. King  
Executive Director and Secretary

**RE: Advice No. 14-04  
Pacific Power & Light Company, a division of PacifiCorp**

Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits for filing and approval by the Washington Utilities and Transportation Commission (Commission) proposed new tariff sheets applicable to electric service supplied by the Company in the state of Washington to become effective on March 31, 2015. The proposed new tariff sheets are contained in Exhibit No. \_\_\_ (JRS-12) accompanying this filing. In accordance with WAC 480-07-510(2), three copies of the proposed new tariff sheets are provided in legislative format.

By the enclosed tariff sheets, Pacific Power requests an increase in revenues from Washington operations resulting in an overall price change of 8.5 percent or \$27.2 million. The filing is based on a historical test period of the 12 months ended December 31, 2013, adjusted for known and measurable changes. Consistent with Commission precedent, the Company's net power costs are based on the pro forma period of the 12 months ending March 31, 2016, which corresponds to with the rate effective period. In addition, the Company seeks amortization over one year of \$4.9 million related to deferrals for an outage at Unit 4 of the Colstrip generating plant, low hydro conditions, and depreciation. If approved, this would result in an overall price change of 1.5 percent.

A summary of the relief requested, the reasons Pacific Power is seeking this relief, and an overview of the topics covered by each of Pacific Power's witnesses is provided in the pre-filed direct testimony of Mr. Richard P. Reiten, Exhibit No. \_\_\_ (RPR-1T), which is included in this filing. In compliance with WAC 480-07-510(1), the Company has enclosed nineteen paper copies of Pacific Power's pre-filed direct testimony and exhibits supporting this general rate case filing. One copy of the testimony and exhibits in electronic format is also included.

Pacific Power has marked certain pages of its filing "CONFIDENTIAL." These documents are protected from any further disclosure by the Commission or the Office of the Attorney General, including their outside experts, under RCW 80.04.095 and WAC 480-07-160.

Pacific Power's filing includes a motion requesting that the Commission issue a protective order to govern disclosure of confidential information for use in this case.

Pacific Power requests that the documents contained in the envelopes identified with the cover page marked "CONFIDENTIAL PER WAC 480-07-160," as well as the files marked "CONFIDENTIAL" or "CONF" on the versions of the CDs containing confidential materials, be treated as confidential under the provisions of WAC 480-07-160 because they contain sensitive commercial information. In accordance with WAC 480-07-160(3)(c), Pacific Power has enclosed redacted versions of the documents containing confidential information along with the non-confidential documents in its filing, and has placed unredacted versions of the documents containing confidential information in separate envelopes with corresponding "CONFIDENTIAL PER WAC 480-07-160" labels on the envelopes. Each page of the unredacted version containing confidential information is printed on yellow paper.

As required by WAC 480-07-510(3), the Company has enclosed three paper copies of supporting workpapers, as well as providing the workpapers in electronic format on the enclosed CDs. Where feasible, paper copies have been provided; however, due to the considerable size and format of the documents, many documents are provided only in electronic format. Certain workpapers and models are being provided as confidential under WAC 480-07-160(3).

As required by WAC 480-07-510(7), the Company has also enclosed one copy of the following: the Company's most recent FERC Form 1; the Company's Form 10Ks and Form 10Qs; the Company's most recent bond issuance prospectus; and the 2012 Affiliated Interest Report. There are no annual or quarterly reports to shareholders.

In compliance with WAC 480-100-194, Pacific Power agrees to suspend the proposed tariff filing and thus is not required to publish notice immediately before or coincident with the date of this letter and filing. Pacific Power agrees to waive the suspension hearing and requests that the Commission issue an order suspending these proposed changes for investigation, and that a hearing to take testimony from the public be scheduled at the prehearing conference. Accordingly, the Company will provide notice to the public under WAC 480-100-197. In compliance with WAC 480-100-193(1), Pacific Power will also post the proposed changes to its tariff sheets for public inspection and review on its website.

Please direct all service and correspondence related to this filing to:

Washington Dockets  
Pacific Power & Light Company  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
Email: [washingtondockets@pacificcorp.com](mailto:washingtondockets@pacificcorp.com)

Sarah K. Wallace  
Assistant General Counsel  
Pacific Power & Light Company  
825 NE Multnomah, Suite 1800  
Portland, OR 97232  
Telephone: (503) 813-5865  
Email: [sarah.wallace@pacificcorp.com](mailto:sarah.wallace@pacificcorp.com)

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Katherine McDowell  
McDowell, Rackner & Gibson PC  
419 S.W. Eleventh Avenue, Suite 400  
Portland, OR 97205  
Telephone: (503) 595-3924  
Email: Katherine@mcd-law.com

In addition, the Company respectfully requests that all data requests regarding this matter be addressed to:

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

By regular mail:                 Data Request Response Center  
Pacific Power & Light Company  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Attachment A to this letter is the Summary Document prepared in compliance with WAC 480-07-510(4). In compliance with WAC 480-07-510(5), Pacific Power is serving copies of the Summary Document on the persons listed on the attached Certificate of Service. Attachment B to this letter is a listing of the tariff sheets proposed to be revised. Attachment C is the Printed Index for all electronic files included with this filing.

Sincerely,

A handwritten signature in cursive script that reads "R. Bryce Dalley" followed by a forward slash and the initials "SKW".

R. Bryce Dalley  
Vice President, Regulation

Enclosures