

January 10, 2017

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

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

RE: UE-160781—2015 Energy and Emissions Intensity Metrics Report

On June 1, 2016, Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submitted its 2015 Energy and Emissions Intensity Metrics Report. On December 29, 2016, Commission staff requested that the Company provide additional information to explain an annual increase in average commercial usage (megawatt-hours per customer) over the last 6-7 years.

After evaluating available information, the Company believes the increase in average commercial customer usage is attributed to an internal initiative to reclassify certain customers in all states that began around the same time period. Historically, customers who had meters on facilities other than residential homes were set up as commercial customers based on the fact that there were no residents living on site. For example, if a customer had a separate meter on a garage or pole barn, those accounts were classified as commercial by default. Many of these types of customers were reclassified as residential or other appropriate class over the last 6-7 years. This led to a steady decrease in the customer count for the commercial class, but as the majority of these reclassified customers had very small usage, it did not have a corresponding effect on overall commercial customer usage.

Based on this information, the average commercial usage was likely higher than what is reflected in the years before this reclassification effort. The Company is continuing to evaluate the historical data and whether there is a more appropriate metric that would show the actual commercial class trends for the reported years.

Please direct informal questions to Ariel Son, Regulatory Projects Manager, at (503) 813-5410.

Sincerely,



R. Bryce Dalley
Vice President, Regulation