

May 10, 2010

VIA ELECTRONIC FILING

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

Attention: David W. Danner
Executive Director and Secretary

RE: Docket U-100523 Comments

Dear Mr. Danner:

PacifiCorp, d.b.a. Pacific Power (Company) submits comments in response to the Washington Utilities and Transportation Commission's (Commission) Notice of Opportunity to File Written Comments (Notice) issued in Docket U-100523 on April 9, 2010. The Notice seeks comments on the possibility of adding new rules or modifying existing rules to address utility use of electronic bills, notices of tariff revisions, bill inserts, documents in adjudicative proceedings, and reports required by settlement stipulations.

Neither the Notice nor the CR-101 specifies rules to be reviewed, nor have new rules been proposed at this time. The Company reviewed existing Commission rules and held informal discussions with Staff. While the Company believes the current rules allow sufficient flexibility for the use of electronic documents, clarification of certain rules could be useful to ensure consistent interpretation across affected parties. Through this docket, the Company suggests that the Commission review the following Washington Administrative Code provisions for possible revision concerning the use of electronic documents:

- WAC 480-100-113(8) Residential Services Deposit Requirements
- WAC 480-100-118(5) Nonresidential Services Deposit Requirements
- WAC 480-100-128(3)(a) Disconnection of Service
- WAC 480-100-178(2) Billing Requirements and Payment Date
- WAC 480-100-194(1) & (3) Publication of Proposed Tariff Changes to Increase Charges or Restrict Access to Service
- WAC 480-100-195 Notice of Tariff Changes Other Than Rate Increases
- WAC 480-100-197(3) Adjudicative Proceedings Where Public Testimony Will be Taken

Additionally, the Commission could consider promulgating a new rule to expressly address acceptable methods of delivering certain documents.


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PacifiCorp looks forward to participating in the Commission's review. Please direct any questions to Cathie Allen, Regulatory Manager, (503) 813-5934.

Sincerely,

A handwritten signature in cursive script that reads "Andrea L. Kelly /ca".

Andrea L. Kelly

Vice President, Regulation