

March 25, 2014

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

Public Utility Commission of Oregon
3930 Fairview Industrial Drive S.E.
Salem, OR 97302-1166

Attn: Filing Center

Re: AR 578—In the Matter of a Rulemaking Regarding Due Dates for Certain Energy Utility Reports

In accordance with the Notice of Proposed Rulemaking issued by the Public Utility Commission of Oregon (Commission), PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) provides the following comments regarding proposed changes to due dates for certain energy utility reports. The proposed changes affect OAR 860-027-0005, -0015, and -0070.

OAR 860-027-0005

This rule currently requires energy utilities with gross revenues greater than \$50,000 to file with the Commission a copy of their proposed Budgets of Expenditures annually by November 1. PacifiCorp generally requests a waiver of the filing date to accommodate planning and budgeting schedules for its six-state service territory. With the proposed change, energy utilities would be required to annually notify the Commission by December 1 of the date by which they will file the Budgets of Expenditures. While the Company supports Commission Staff's proposed change, an alternative would be to set the deadline on March 31 of each year. This would allow sufficient time for PacifiCorp to prepare the report and eliminate the need for the Company to notify the Commission annually of the date by which it intends to file.

OAR 860-027-0015

This rule currently requires energy utilities to annually file with the Commission new construction budgets by December 31. Similar to OAR 860-027-0005, PacifiCorp frequently requests waivers of this filing deadline to accommodate planning and budgeting schedules for its six-state service territory. With the proposed change, energy utilities will be required to notify the Commission of when they will file their annual New Construction Budgets. While the Company supports Commission Staff's proposed change, an alternative would be to set the deadline on March 31 of each year. This would allow sufficient time PacifiCorp to prepare the report and eliminate the need for the Company to notify the Commission annually of the date by which it intends to file.

OAR 860-027-0070(1)

Similar to other Oregon annual reports, the FERC Form 1 Supplement must be filed with the Commission by April 1 of each year. PacifiCorp generally seeks an extension of time for filing such reports due to the time needed to prepare such reports, which cover a six-state service territory. The proposed change would make May 1 the new filing deadline. However, even with this change, PacifiCorp would need to request an extension of time to file the required report. Accordingly, to avoid the need to file an extension request annually, PacifiCorp proposes May 31 as the deadline instead.

PacifiCorp appreciates the opportunity to provide these comments and looks forward to discussing these issues in efforts to reach solutions that work for all affected parties.

Please direct questions to Gary Tawwater, Regulatory Affairs Manager, at (503) 813-6805.

Sincerely,

A handwritten signature in black ink that reads "R. Bryce Dalley/GWT". The signature is written in a cursive, flowing style.

R. Bryce Dalley
Vice President, Regulation

Cc: AR 578 Service List

CERTIFICATE OF SERVICE

I hereby certify that on this 25th of March, 2014, I caused to be served, via E-Mail and/or overnight delivery, a true and correct copy of the foregoing document on the following named person(s) at his or her last-known address(es) indicated below.

SERVICE LIST AR-578

OPUC Dockets
Citizens' Utility Board of Oregon
610 SW Broadway, STE 400
Portland, OR 97205
dockets@oregoncub.org

Robert Jenks
Citizens' Utility Board of Oregon
610 SW Broadway, STE 400
Portland, OR 97205
bob@oregoncub.org

Kelly O Norwood
Avista
PO Box 3727
Spokane, WA 99220-3727
Kelly.norwood@avistacorp.com

Melinda J. Davison
Davison Van Cleve PC
333 SW Taylor – Ste 400
Portland, OR 97204
mjd@dvclaw.com

Tim Tatum
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
ttatum@idahopower.com

Onita King
Northwest Natural
220 NW 2nd Avenue
Portland, OR 97209-3991
ork@nwnatural.com

R. Bryce Dalley
Pacific Power
825 NE Multnomah Street, Suite 20000
Portland, OR 97232
bryce.dalley@pacificcorp.com

Patrick Hager Rates and Regulatory Affairs
Portland General Electric
121 SW Salmon St – 1WTC1711
Portland, OR 97204
Pge.opuc.filings@pgn.com

G. Catriona McCracken
Citizens' Utility Board of Oregon
610 SW Broadway, STE 400
Portland, OR 97205
catriona@oregoncub.org

Michael Parvinen
Cascade Natural Gas
8113 W Grandridge Blvd
Kennewick, WA 99336
Michael.parvinen@cngc.com

Edward Finklea
326 Fifth Street
Lake Oswego, OR 97034
efinklea@nwigu.org


Lisa D. Nordstrom
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
lnordstrom@idahopower.com

Courtney Waites
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
cwaites@idahopower.com

Mark R. Thompson
Northwest Natural
220 NW 2nd Avenue
Portland, OR 97209-3991
Mark.thompson@nwnatural.com

Ariel Son
Pacific Power
825 NE Multnomah Street, Suite 20000
Portland, OR 97232
ariel.son@pacificcorp.com

Jay Tinker
Portland General Electric
121 SW Salmon St – 1WTC-0702
Portland, OR 97204
pge.opuc.filings@pgn.com



Amy Eissler
Coordinator, Regulatory Operations