



825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

April 20, 2020

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-1166

Attn: Filing Center

**Re: UM 1631—PacifiCorp's Petition for a Limited Waiver of OAR 860-027-0070(1)**

PacifiCorp d/b/a Pacific Power (PacifiCorp) submits for filing its Petition for a Limited Waiver of OAR 860-027-0070(1).

PacifiCorp respectfully requests that all data requests in this docket be addressed to:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

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

Informal questions concerning this filing may be directed to Cathie Allen, Manager, Regulatory Affairs, at (503) 813-5934.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Wilding".

Michael Wilding  
Director, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1631**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Petition for a Limited Waiver of the Filing  
Deadline in OAR 860-027-0070(1).

**PETITION FOR A LIMITED WAIVER  
OF THE FILING DEADLINE  
IN OAR 860-027-0070(1)**

*Expedited Consideration Requested*

PacifiCorp d/b/a Pacific Power files this petition with the Public Utility Commission of Oregon (Commission) under OAR 860-027-0000(2), which allows the Commission to waive application of a Division 027 rule “for good cause shown.” OAR 860-027-0070(1) requires electric, gas, water, and steam heat utilities to file their Annual Reports (including Results of Operations) by May 1 of each year. Due to the operational complexities of working remotely during the COVID-19 public health emergency, PacifiCorp requests an alternative filing deadline of May 15, 2020, to file its 2019 Results of Operations report. This short extension is needed to allow sufficient time to process the data necessary to produce PacifiCorp’s 2019 Results of Operations due to the complexities associated with working and reviewing the data with a very limited number of employees able to work on site and the rest working remotely.

PacifiCorp requests expedited consideration of this petition. PacifiCorp had previously believed it would be able to timely file its Result of Operations, but the complexities associated with a substantial number of employees working remotely has led to some unexpected challenges.

Granting this waiver is in the public interest. The requested waiver allows additional time to complete PacifiCorp’s 2019 Results of Operations, without risk of errors that would need to be corrected. Granting the waiver will reduce the risk of unnecessary administrative burden

on both PacifiCorp and Commission Staff. There is no harm to PacifiCorp's customers. Accordingly, good cause exists to grant PacifiCorp's request for this waiver.

Respectfully submitted this 20<sup>th</sup> day of April, 2020.

By:



Matthew McVee  
Chief Regulatory Counsel  
PacifiCorp d/b/a Pacific Power