PACIFIC POWER
A DIVISION OF PACIFICORP

825 NE Multnomah, Suite 2000
Portland, Oregon 97232

April 7, 2021

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

**RE: AR 641—PacifiCorp's Comments**

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) appreciates the opportunity to provide additional comments and redlines to update and refine the Public Utility Commission of Oregon's (Commission) Division 001 procedural rules. These comments respond to the proposed redlines for Oregon Administrative Rules (OAR) 860-001-0070 and 860-001-0170, and the proposed rules for 860-001-0500, 860-001-0540 and 860-022-0019 which were circulated for review on March 30, 2021.

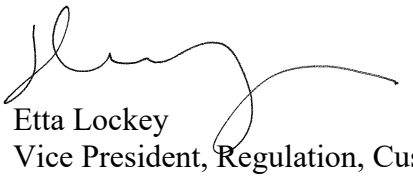
**OARs 860-001-0070 and 860-001-0170**
While the Company does not have any suggested edits to the proposed redlines, the Company notes that the proposed changes to OAR 860-001-0170 appear to signal a move from an explicit filing process detailed in the rules to a more flexible approach with the ability to adapt to changing technology and to allow for process development. Although PacifiCorp is generally supportive of this proposal, it may create a situation where it is harder for parties less familiar with the filing process to comply. Parties may have to review the rules, an implementation policy on the website, and the Administrative Law Judge's prehearing memo to understand what is required. Some of these concerns could possibly be mitigated by: including a reference to any operating guidelines that should be followed in the rules and for those to be easily accessible on the Commission's website; providing a notice and an opportunity to comment on proposed changes to the operating guidelines; and maintaining the ability for parties to contact the filing center if a waiver is required to avoid rejection of a filing.

The Company also notes that the proposed redlines eliminate section 1(f), which required that the Filing Center receive confidential information from a filing within two business days. Although it may be rare that a party is unable to provide confidential information electronically, it could happen. Removing the provision may require a party to seek a waiver from the Commission in those instances, which in some cases could be impractical. PacifiCorp would recommend maintaining this provision.

**OARs 860-001-0500, 860-001-0540 and 860-022-0019**
PacifiCorp has one edit for Oregon Administrative Rule (OAR) 860-001-0540(1)—specifically that the rule be changed so that discovery is due within 10 business days from the date of service instead of 14 calendar days.

The Company remains engaged in this rulemaking process and looks forward to additional opportunities for further discussion of the proposed rules with the Commission and parties.

Sincerely,



Etta Lockey
Vice President, Regulation, Customer & Community Solutions