PACIFIC POWER
A DIVISION OF PACIFICORP

825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232

November 13, 2025

***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 Post-Workshop Comments**

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) provides these comments on the Public Utility Commission of Oregon's (Commission) workshop to discuss the proposed modules and sequencing to review and amend Division 001 rules.

The Company has no concerns with the proposed modules the sequencing proposal to combine modules listed on page 12 of the presentation. Additionally, PacifiCorp has initially reviewed the rules identified in Division 3, Chapter 137 of the Oregon Administrative Rules. While there may be some elements that could be considered to improve administrative efficiency, overall these rules are not quite suited for the very specific needs of contested proceedings at the Commission. The Commission's existing rules are better suited to support contested case proceedings at the Commission and any modifications should use the existing process as a starting point.

The Company greatly appreciates the opportunity to provide comments and looks forward to working with the Commission on these revisions. If you have any questions about this filing, please contact Amira Thompson, State Regulatory Affairs Manager, at (503) 260-4420.

Sincerely,

Robert Meredith
Director, Regulation