

**UMPA’s Comments On and Objections to Revisions to Business Practice #64**  
**February 10, 2017**

PacifiCorp posted proposed revisions to Business Practice #64 on February 7, 2017, asking for comment by February 10, 2017, and proposing an effective date of February 13, 2017. Such a compressed timeline is contrary to PacifiCorp’s own Business Practice Guidelines as set forth in Business Practice #13. BP #13 states in relevant part:

Except under exceptional circumstances, including, but not limited to, circumstances in which reliable operation of the transmission system may be impeded or situations in which describing an existing procedure or practice is deemed necessary for the administration of customer service, PacifiCorp will post for comment new or revised Business Practices in the publicly-available portion of its OASIS prior to implementation and consistent with the timelines described below. The effective date will be denoted on the Business Practice.

**Comments to Initial Issue of Business Practices**

Business Practices will initially be labeled as DRAFT. They will be posted under the “Business Practices – Open for Public Comment” section on OASIS for a 30-day comment period. PacifiCorp’s Transmission Customers may submit comments to [businesspractices@pacificorp.com](mailto:businesspractices@pacificorp.com). Comments that are timely received will be posted to OASIS. PacifiCorp will review and respond to comments in one written document. This document will be posted under the “Business Practices – Response to Public Comment” section on OASIS. Once the comments have been incorporated, as deemed appropriate by PacifiCorp, the practice will be issued as Revision 0.0.

\*\*\*

**Revision to Existing Business Practices**

When necessary to revise an existing Business Practice, either because of customer comments, operational needs of the Transmission Provider, or a change in the law or regulations, the revision will be summarized in the revision history of a Business Practice. Additionally, a redline version reflecting the most recent revisions will be provided as a link within the newly revised Business Practice. The revised Business Practice will be posted on OASIS under Business Practices – Open for Public Comment for ten business days. Feedback concerning the revisions may be submitted to [businesspractices@pacificorp.com](mailto:businesspractices@pacificorp.com) during that time. Comments that are timely received will be posted to OASIS.<sup>3</sup> In the event that no comments are received regarding the proposed revisions during that time, the revised Business Practice will become effective at the end of the comment period. If PacifiCorp determines further modifications are needed as a result of comments received, it will allow an additional five business day comment period for consideration of any additional revisions.

---

<sup>3</sup> Comments that are timely received will be posted to OASIS unless they contain confidential customer information, in which case, the comments will only be posted after receiving written authorization from the affected customer(s). Reasonable effort will be made to review and post

comments within seven days of receipt. Notwithstanding the foregoing, PacifiCorp reserves the right to post or not post comments in its sole discretion.

UMPA is unaware of any “exceptional circumstances” being involved here. Involved is a rate matter, not a matter involving reliability of system operations. BP #13 provides for a 30-day comment period (except under exceptional circumstances), to be followed by PacifiCorp’s written response to comments received. The revised Business Practice is not to be issued until those steps are completed. Here, the comment period has been compressed without explanation to three (3) days, no mention is made of a written response to comments by PacifiCorp, and the revisions are said to become effective after just another three (3) days. UMPA thus objects to PacifiCorp’s unexplained departure from its own procedures and the denial of any meaningful opportunity to consider and comment on the proposed changes. Even under the second paragraph, these changes will not have been posted for ten days as indicated in BP#13.

Given the highly compressed comment period, UMPA can do little more in the form of substantive comment than direct PacifiCorp to the protests of UMPA and other Protestors in FERC Docket No. ER17-219-000, wherein UMPA and other parties have protested various aspects of PacifiCorp’s proposed changes to Schedules 5 and 6, among others.