

June 16, 2017

VIA ELECTRONIC MAIL

Suzanne Casazza
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Email: Suzanne.Casazza@cpuc.ca.gov

Re: Comments of PacifiCorp (U 901 E) on Request of President Michael Picker for Informal Comments on the Customer and Retail Choice En Banc and White Paper

Dear Ms. Casazza,

In response to the June 1, 2017, *Request of President Michael Picker for Informal Comments on the Customer and Retail Choice En Banc and White Paper*, PacifiCorp, d/b/a Pacific Power (PacifiCorp) submits the following comments. PacifiCorp is California's only multi-jurisdictional utility providing electric retail service to customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp serves approximately 45,000 customers in portions of Del Norte, Modoc, Shasta, and Siskiyou counties in Northern California which represents approximately 1.5 percent of the total retail load served across PacifiCorp's six-state system. PacifiCorp's California service territory is rural with small pockets of population. On average, PacifiCorp serves four customers per square mile in California. PacifiCorp's California service territory is not included in the CAISO balancing authority area, but rather PacifiCorp is its own balancing authority for its multi-state service territory (including California), which is operated on an integrated basis with other states in the western portion of its multi-state territory.

PacifiCorp is uniquely situated in that before the suspension of direct access, no Energy Service Providers had registered in PacifiCorp's California service territory. Direct access has since been reopened, but only in the service territories of the three large investor owned utilities and currently there are no community choice aggregators (CCAs) in PacifiCorp's service territory.¹ With the growth of consumer and retail choice across the state, PacifiCorp appreciates the California Public Utilities Commission's (Commission) focus on addressing the key framework policies identified in Staff's White Paper² affected by these trends including resource planning, reliability, ensuring all customers pay their fair share, ensuring universal access, rate design, and consumer protection.

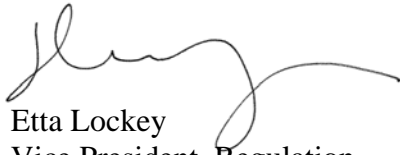
¹ PacifiCorp has approximately 330 net metering customers.

² "Consumer and Retail Choice, the Role of the Utility, and an Evolving Regulatory Framework." California Public Utilities Commission Staff White Paper published May 9, 2017 (Staff White Paper).

PacifiCorp agrees that these key policies identified in Staff's White Paper should be addressed. PacifiCorp acknowledges the potential challenges in implementing state-wide policies addressing these issues. There should be robust consumer protection programs in place to reduce the risk that residential customers may face with increased competition. PacifiCorp also agrees that fair and equitable assignment of costs is a key policy consideration. Due to PacifiCorp's relatively small number of customers, any departing load could result in a disproportionate cost burden on remaining customers. It is important that policies are implemented to ensure all customers pay their fair share and one group of customers is not advantaged or disadvantaged over another group of customers.

PacifiCorp appreciates the opportunity to provide these informal comments on the Customer and Retail Choice En Banc and White Paper. Please direct any questions concerning these comments to Cathie Allen, Regulatory Manager, at (503) 813-5934.

Sincerely,

A handwritten signature in black ink, appearing to read 'Etta Lockey', with a long horizontal flourish extending to the right.

Etta Lockey
Vice President, Regulation