

March 23, 2010

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

David W. Danner  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

**Re: Petition of PacifiCorp for Modification of WAC 480-100-275 Filing  
Requirements**

Dear Mr. Danner,

In accordance with WAC 480-07-370, WAC 480-07-395 and WAC 480-07-110,  
enclosed for filing are an original and twelve (12) copies of the above-mentioned petition.


It is respectfully requested that all data requests be addressed in the following manner,  
with copies to the Company's counsel:

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, OR 97232

Please direct any informal inquiries to Cathie Allen, Regulatory Affairs Manager, at  
(503) 813-5934.

Sincerely,



Andrea L. Kelly  
Vice President, Regulation

Enclosures

cc: Thomas Schooley

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

In the Matter of

PACIFICORP, dba PACIFIC POWER

Petition for Modification to Actual Results  
for Washington Operations Report  
Requirements.

DOCKET UE-072123

PACIFICORP'S PETITION FOR  
MODIFICATION OF WAC 480-100-275  
REQUIREMENTS

1. Pursuant to WAC 480-100-008 and WAC 480-07-110(1), PacifiCorp, d.b.a. Pacific Power ("PacifiCorp" or "Company"), hereby petitions the Washington Utilities and Transportation Commission ("Commission") for modification of the Actual Results for Washington Operations Report filing requirements contained in WAC 480-100-275.

2. PacifiCorp's name and address:

PacifiCorp Washington Dockets  
825 NE Multnomah, Ste 2000  
Portland, OR 97232  
[WashingtonDockets@PacifiCorp.com](mailto:WashingtonDockets@PacifiCorp.com)

Michelle R. Mishoe  
Legal Counsel  
825 NE Multnomah, Ste 1800  
Portland, OR 97232  
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[michelle.mishoe@pacificorp.com](mailto:michelle.mishoe@pacificorp.com)

3. WAC 480-100-275 requires electric utilities to file actual results of Washington operations within sixty days of the end of each quarter. On June 21, 2007, the Commission issued Order No. 08 in Docket No. UE-061546, approving PacifiCorp's West Control Area inter-jurisdictional cost allocation methodology ("WCA"), with modifications. To accurately implement the new allocation methodology, PacifiCorp requested additional time to report actual results for the quarter ending June 30, 2007. This request was approved in Order No. 01 Docket No. UE-071467. On September 28,

2007, PacifiCorp subsequently filed its June 30, 2007 quarterly results of operations in compliance with the order.

4. The Company submitted a Petition for Modification of the Actual Results for Washington Operations Report filing requirements contained in WAC 480-100-275 in Docket No. UE-072123, requesting an indefinite thirty-day extension of time for filing its quarterly actual results of operations. In that Petition, the Company also requested that the thirty-day extension be applied to its report of environmental remediation. In Order No. 02, the Commission granted a modification, allowing the Company to file its quarterly actual results of operations reports ninety days from the end of the quarter for the quarters ending September 30, 2007, through December 31, 2009. Order No. 02 also allowed the Company to file its environmental remediation expenditures every other quarter with the actual results of operations reports.

4. The Company's circumstances remain unchanged from the prior request for modification of the requirements contained in WAC 480-100-275. The total company data necessary to finalize the reporting of the actual results of operations becomes available within sixty days of the end of the quarter. This data then needs to be analyzed to determine the data related only to the Company's West Control Area. In order to ensure that its reporting of Washington's actual results of operations under the WCA allocation methodology is accurate, commencing with the quarter ending March 31, 2010, PacifiCorp requests a continuation of the thirty-day extension previously granted by the Commission. In Docket No. UE-061546, the Commission approved the WCA allocation methodology for a five-year trial period. The Company requests that this

modification be effective through the five-year trial period, meaning the Company would continue to file its report ninety days after the end of each quarter during this time.


5. Additionally, the Company includes a report of environmental remediation expenditures on a semi-annual basis as part of the quarterly results of operations filing, pursuant to Order No. 01 in Docket No. UE-031658. For procedural efficiency and to reduce administrative burden, the Company also requests that the environmental remediation expenditures report continue to be provided with the quarterly results reports and that the thirty-day extension also be applied.

6. The Commission may grant a modification of its rules “if consistent with the public interest, the purposes underlying the regulation, and applicable statutes.” WAC 480-07-110(1). PacifiCorp’s petition is consistent with these standards. The public interest and the purposes underlying the quarterly reporting requirements will be best served by granting the additional thirty-day extension to allow the accurate reporting of Washington’s actual results of operations under the WCA allocation method.

7. PacifiCorp respectfully requests a thirty-day extension of time in which to file its Actual Results for Washington Operations Report and the semi-annual environmental remediation expenditures report through the five-year trial period of the WCA.

DATED: this 23<sup>rd</sup> day of March, 2010.

Respectfully submitted,



Michelle R. Mishoe  
Legal Counsel  
Pacific Power  
825 NE Multnomah, Ste 1800  
Portland, OR 97232