



April 18, 2005

**VIA ELECTRONIC MAIL**

Carole J. Washburn  
Executive Secretary  
Washington Utilities and  
Transportation Commission  
1300 S Evergreen Park Drive SW  
Olympia, WA 98504-7250

**Re: Request for Extension of Time  
WAC 480-107-060(2)(a)**

Dear Ms. Washburn:

PacifiCorp submitted its 2004 Integrated Resource Plan (IRP) to the Commission on January 20, 2005 in accordance with WAC 480-100-238; that filing was assigned Docket No. UE-050095. The Commission's current competitive bidding rules (Chapter 480-107 WAC) provide that within ninety days thereafter, PacifiCorp is required to file a "draft request for proposal" with the Commission to commence a process for soliciting bids to procure new resources. PacifiCorp hereby requests an extension of this ninety-day requirement to permit a later filing of a proposed Request for Proposal, or RFP. In support of this request, PacifiCorp provides the following information.

Action Plan item number 7 in the Company's IRP calls for a 550 MW supply side resource to be delivered to Utah by the summer of 2009. *IRP 2004, page 181*. The Company is currently developing a solicitation, RFP 2009, to secure this resource. PacifiCorp is proposing to develop RFP 2009 in a manner that will achieve compliance with requirements imposed by the Oregon competitive bidding rules<sup>1</sup> and recent legislation enacted in Utah,<sup>2</sup> as well as meeting the standards imposed by the Federal Energy Regulatory Commission with respect to affiliate participation. The Company also proposes to submit RFP 2009 to the Commission to fulfill the

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<sup>1</sup> OPUC Order No. 91-1383.

<sup>2</sup> Senate Bill 26, enacted as Title 17, Chapter 17 of the Utah Code.

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requirements imposed by Chapter 480-107 WAC. PacifiCorp cannot complete the necessary consultations and fulfill the compliance issues associated with these various requirements on a schedule that would permit a proposed RFP to be submitted to the Commission by April 21, 2005, the deadline imposed by WAC 480-107-060(2)(a).

The anticipated timeline for development and issuance of RFP 2009 is as follows:


April/May 2005	Retain consultant, conduct workshops, draft RFP
May – July 2005	Commission process
Aug. 2005	Resolve any multi-state issues
Sep. 2005	Formally issue RFP
Oct. – Nov. 2005	Pre-bid conference, pre-qualify bidders
Dec. 2005 – Jan. 2006	Bids due, evaluate bids
Feb. – June 2006	Counter-party negotiations
Aug. 2006 – Jan. 2007	Prudence review process under Utah SB 26
Jan. 2007	Execute applicable agreements

PacifiCorp requests an extension of the time limit prescribed in WAC 480-107-060(2)(a) to permit RFP 2009 to be submitted to the Commission to fulfill the obligations imposed on the Company under Chapter 480-107 WAC. A ninety-day extension, to July 20, 2005, should be sufficient to permit the Company to develop the proposed RFP 2009 for filing with the Commission.

If the Commission or its Staff has any questions with respect to this request, please contact the undersigned at (503) 813-6092 or Karl Anderberg at (503) 813-6032.

Very truly yours,

**PacifiCorp**

By   
Christy Omohundro  
Managing Director, Regulation

CAO:jlf

cc: Hank McIntosh  
Dr. Yohannes Mariam