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STATE OF WASH.  
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COMMISSION



September 2, 2005

**VIA OVERNIGHT MAIL**

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

**Re: Docket No. UE-050990, PacifiCorp DRAFT 2009 Request for Proposals**


PacifiCorp, doing business as Pacific Power & Light ("PacifiCorp" or the "Company"), hereby requests that the Washington Utilities and Transportation Commission ("Commission") extend the time Commission consideration and decision on PacifiCorp's 2009 Request for Proposals for a Flexible Resource ("RFP 2009") by approximately 30 days. In support of this request, PacifiCorp states as follows:

1. On June 30, 2005, in accordance with WAC 480-107-060(b), PacifiCorp filed a request for approval of its 2009 Request for Proposals for a Flexible Resource ("RFP 2009"). PacifiCorp requested that the Commission issue an order approving 2009 RFP no later than 90 days after the filing date, or by September 28, 2005.
2. Up until this time, PacifiCorp has been proceeding with the expectation that Commission review of the draft RFP 2009 could be concluded within the 90-day timeframe provided for in WAC 480-107-060(b). PacifiCorp has received questions on its draft RFP 2009 and posted responses on its website at [www.pacificorp.com](http://www.pacificorp.com).
3. As part of its routine IRP update process, PacifiCorp is currently undertaking a review and update of its resource assumptions. PacifiCorp expects to complete that update and file the results during October 2005. Initial indications from the update to PacifiCorp's forecasted resource gap are that load curtailment renewals and Qualifying Facilities contract assumptions will reduce or delay the need for 2009. Deferral of the time for a Commission order in this proceeding will provide PacifiCorp with an opportunity to ascertain what impact, if any, there will be to the amount and/or timing of the 2009 need and communicate with all parties. An extension of approximately 30 days is appropriate at this point so as not to jeopardize the ability to go forward with the RFP if necessary in a timely manner.

4. For these reasons, PacifiCorp requests that the RFP review process be delayed by approximately 30 days. The provisions of WAC 480-107-060(b) provide for a 90-day period of Commission review and public comment on draft RFPs unless the Commission determines that additional time is necessary in the public interest. On August 10, 2005, the Commission issued a notice of PacifiCorp's filing of draft RFP 2009 and notified interested persons that comments were due by August 29, 2005. In light of the reasons set forth in this letter, PacifiCorp submits that it would be in the public interest to extend the date for Commission action on the draft RFP 2009 by approximately 30 days, or until October 31, 2005.

If the Commission or its Staff has any questions with respect to this filing, please contact the undersigned at (801) 220-2190 or Karl Anderberg, Washington State Manager, at (503) 813-6032.

Very truly yours,

  
D. Douglas Larson  
Vice President Regulation