

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NOS. UE-140762 and UE-140617 (<i>consolidated</i>)
)	
Complainant,)	
)	
v.)	BOISE WHITE PAPER, L.L.C.’S MOTION FOR PERMISSION TO REPLY TO PACIFIC POWER’S RESPONSE IN OPPOSITION TO MOTION TO STRIKE
PACIFIC POWER & LIGHT COMPANY,)	
)	
Respondent.)	
)	
In the Matter of the Petition of)	
PACIFIC POWER & LIGHT COMPANY,)	DOCKET NO. UE-131384 (<i>consolidated</i>)
For an Order Approving Deferral of Costs Related to Colstrip Outage)	
)	
In the Matter of the Petition of)	
PACIFIC POWER & LIGHT COMPANY,)	DOCKET NO. UE-140094 (<i>consolidated</i>)
For an Order Approving Deferral of Costs Related to Declining Hydro Generation)	
)	

1 Pursuant to WAC 480-07-370(1)(d)(ii), Boise White Paper, L.L.C. (“Boise”) files this motion for permission to reply to “Pacific Power’s Response in Opposition to Motion to Strike” (“Response”), filed on November 25, 2014. Permission to reply is appropriate because the Response raises new material requiring a reply, and Boise will shed additional light on matters asserted by Pacific Power & Light Company (“PacifiCorp” or the “Company”) in the Response, especially in regard to prejudicial considerations and the valid legal basis for Boise’s

Motion to Strike. Attached to this Motion, Boise files its proposed reply (“Reply”) with the Washington Utilities and Transportation Commission (the “Commission”).

2 First, the Reply is justified because PacifiCorp raises new factual allegations in the Response, including statements made in the Declaration of Cindy A. Crane in Support of Pacific Power’s Response in Opposition to Motion to Strike (“Declaration”), which accompanies the Response. Some factual assertions made in the Declaration are entirely new to these proceedings—including details pertaining to PacifiCorp’s coal supply updates not disclosed by Ms. Crane in her rebuttal testimony, and which are highly relevant to Boise’s Motion to Strike. Thus, the Reply is appropriate under the express terms of WAC 480-07-370(1)(d)(ii), given that Boise addresses this new material therein.

3 Second, the Reply also addresses the existence of prejudice and acute mischaracterizations made by the Company as to the legal basis stated by Boise in the Motion to Strike—thereby shedding additional light on relevant Commission standards and other matters asserted in the Response. Accordingly, good cause exists for the Commission to grant permission for the Reply.^{1/} For example, the Company alleges that Boise “relies on cases that are inapplicable.”^{2/} Yet, as demonstrated in the Reply, PacifiCorp cites to the same cases originally relied upon by Boise, in support of the Company’s legal arguments in the Response.^{3/} Further, the Reply demonstrates that prejudice does exist against Boise and all other parties, based on the untimely and unprecedented nature of NPC updates in these proceedings.^{4/}

4 For the foregoing reasons, Boise respectfully requests that the Commission grant permission for the filing of the attached Reply.

^{1/} See In Re the Six-Month Review of Quest Corp.’s Performance Assurance Plan, Docket No. UT-033020, Order 06 at ¶¶ 5-6 (Feb. 4, 2004).

^{2/} Response at ¶13.

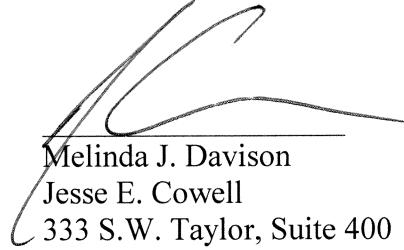
^{3/} Reply at ¶16.

^{4/} Id. at ¶¶ 3-10.

Dated in Portland, Oregon, this 4th day of December, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

A handwritten signature in black ink, appearing to read 'Melinda J. Davison', is written over a horizontal line.

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