

January 13, 2004

VIA E-MAIL AND FIRST CLASS MAIL

Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

Re: January 14, 2004
UE-032065, PacifiCorp d/b/a Pacific Power & Light Company General Rate Case

Dear Secretary Washburn:

The Public Counsel Section of the Washington State Attorney General's Office wishes to express its opposition to the PacifiCorp general rate case filing which will come before the Commission at its next open meeting. Public Counsel urges the Commission to reject this filing. While Public Counsel concurs with Commission Staff's analysis and recommendation that allocation issues are a necessary prerequisite to any general rate proceeding, our concerns also go back to the Commission's Sixth/Eighth Order in UE-020417 and UE-991832 which allowed the present filing.

As you are aware, it is Public Counsel's position that the Sixth/Eighth Order improperly rescinded partial performance of the rate plan now in force which Public Counsel believes should continue to be enforced for the next two years.

Sincerely,

ROBERT W. CROMWELL, JR.
Assistant Attorney General
Public Counsel Section
(206) 464-6595

RWC:cjw

cc: Jaime Van Nostrand