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February 13, 2007

VIA ELECTRONIC FILING

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-070117
PacifiCorp's Expedited Request for Extension of Time to File an Integrated
Resource Plan Pursuant to WC 480-100-238**

Pursuant to WAC 480-100-238(4), PacifiCorp hereby requests an extension of time for 60 days in which to file its Integrated Resource Plan (IRP) in compliance with WAC 480-100-238.

If you have any questions, please contact me at (503) 813-6043 or Melissa Seymour at (503) 813-6711.

Respectfully,

A handwritten signature in black ink that reads "Andrea Kelly/p.n.". The signature is written in a cursive, somewhat informal style.

Andrea Kelly
Vice President, Regulation

Enclosure

states. Stakeholders attending the public input meeting voiced support for the additional time.

5. PacifiCorp appreciates the importance of adhering to Commission deadlines. To that end PacifiCorp has been working diligently to prepare the draft IRP consistent with the current schedule. However, it has become obvious to PacifiCorp that it cannot meet the current filing deadlines, if PacifiCorp is to adequately address and respond meaningfully to the important additional matters resulting from a series of recent commission and legislative developments. PacifiCorp has seriously considered its decision to request additional time and ultimately determined that a short extension of time would provide substantial benefits to the stakeholders and the company in the form of a more fully developed IRP proposal that takes into consideration the following significant developments:

a. accommodation of the "Washington-only" allocation methodology proposed in the currently pending PacifiCorp general rate case in Docket UE-061546. PacifiCorp will not receive formal testimony from key parties on this proposal until February 16, 2007 and thus, will not have an opportunity to respond to any issues in its IRP if it is required to file its draft IRP on February 19, 2007.

b. recent state legislation or proposed legislative/regulatory initiatives in Washington, California and Oregon designed to promote renewable facilities and restrict the use of new coal facilities. This includes the signing of the Western Public Utility Commissions' Joint Action Framework on Climate Change by this Commission, as well as the Oregon and California commissions.

c. the Oregon Public Utility Commission's new IRP guidelines issued January 8, 2007, which took effect immediately and apply to PacifiCorp's 2006 IRP filing.

d. comments received from stakeholders during the draft 2012 Request for Proposal development process, as well as the Oregon Public Utility Commission's denial of the company's request for approval of this RFP and the Public Service Commission of Utah's recommended RFP modifications.

e. the MSP Standing Committee has convened a Commissioner forum on March 7, 2007 to examine the impacts of divergent state energy policies in respect to new resources.

6. The company does not believe it is prudent or administratively efficient to submit an IRP that does not address these state-specific matters in a meaningful and fully developed manner. PacifiCorp needs additional time to conduct further portfolio analysis and revise its IRP to recognize the significant differences among the states in regard to energy policy and resource planning imperatives. Specifically, the company intends to analyze alternatives to a "base case" portfolio. The base case portfolio reflects the resource choices that the company would make in the absence of state restrictions upon the resources that could be selected, and that meets state least-cost resource planning requirements currently in place. Alternative portfolios would address the existing state restrictions as well as restrictions that can be reasonably anticipated based on current legislative activity and public policy trends. For example, a number of stakeholders in PacifiCorp's western states advocate a clean coal "bridging" strategy that defers coal plant investments until carbon dioxide removal and sequestration technologies become commercially proven. The additional portfolio analysis would help determine what resource choices are in alignment with such state-specific strategies, and reveal their cost and risk impacts on a system-wide basis. Additional time is also needed to develop an IRP process and action plan that addresses options for specifying state-specific or region-specific resource portfolios, or is based on a framework that deviates from a system-wide planning basis.

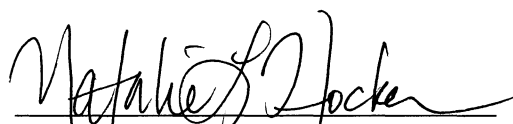
7. PacifiCorp does not believe its current IRP can be acknowledged in all states given these differences, and will be greatly prejudiced if it does not receive additional time to undertake and complete these tasks. Also, stakeholders voiced their support at the February 1, 2007 IRP public input meeting for an additional filing extension to allow PacifiCorp to put forth a more fully developed draft IRP, incorporating the analysis identified above.

8. PacifiCorp requests an additional 60 day extension of time for filing its IRP in order to determine the best path to achieve an acknowledged IRP and action plan, and perform the needed analysis. PacifiCorp requests that the procedural schedule established in Order 01 *Order Granting Temporary Exemption from WAC 480-100-238(4)* (January 24, 2007) be amended as follows:

Filing of Company's Draft IRP	March 19, 2007
Filing of Company's Final IRP	May 30, 2007

9. Given the pending February 19, 2007 filing date, PacifiCorp respectfully requests expedited consideration of its extension request in order to comply with the Commission's requirements. In the event PacifiCorp does not receive an extension of time it will endeavor to comply with the timelines set forth in Commission Order 01 to the fullest extent possible.

Dated this 13th day of February 2007.


Natalie L. Hocken
Vice President & General Counsel
Pacific Power

Counsel for PacifiCorp