

August 15, 2012

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Attention: David W. Danner
Executive Director and Secretary

**Re: Petition of PacifiCorp for Modification of WAC 480-100-275 Filing
Requirements
Docket No. UE-072123**

Dear Mr. Danner,

In accordance with WAC 480-07-370, WAC 480-07-395 and WAC 480-07-110,
enclosed for filing are an original and twelve (12) copies of the above-mentioned petition.


It is respectfully requested that all data requests be addressed in the following manner,
with copies to the Company's counsel:

By Email (preferred): datarequest@pacificorp.com

By Regular Mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Please direct any informal inquiries to Carla Bird, Regulatory Affairs Manager, at (503)
813-5269, or Carla.Bird@pacificorp.com.

Sincerely,


William R. Griffith
Vice President, Regulation

Enclosures
cc: Thomas Schooley

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

In the Matter of

PACIFICORP, dba PACIFIC POWER &
LIGHT COMPANY

Petition for Modification to Actual Results
for Washington Operations Report
Requirements.

DOCKET UE-072123

PACIFICORP'S PETITION FOR
MODIFICATION OF WAC 480-100-275
REQUIREMENTS

1. Pursuant to WAC 480-100-008 and WAC 480-07-110(1), PacifiCorp, d.b.a. Pacific Power & Light Company (PacifiCorp or Company), hereby petitions the Washington Utilities and Transportation Commission (Commission) for modification of the actual results for Washington operations report filing requirements contained in WAC 480-100-275.

2. PacifiCorp's name and address:

PacifiCorp Washington Dockets
825 NE Multnomah, Ste 2000
Portland, OR 97232
Washington.Dockets@PacifiCorp.com

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3. WAC 480-100-275 requires electric utilities to file actual results for Washington operations within sixty days of the end of each quarter. On June 21, 2007, the Commission issued Order No. 08 in Docket No. UE-061546, approving PacifiCorp's West Control Area (WCA) inter-jurisdictional cost allocation methodology, with modifications. To accurately implement the new allocation methodology, PacifiCorp requested additional time to report its actual results for the quarter ending June 30, 2007.

This request was approved in Order No. 01, Docket No. UE-071467. On September 28, 2007, PacifiCorp subsequently filed its quarterly June 30, 2007, actual results for Washington operations in compliance with the order.

4. On October 31, 2007, PacifiCorp submitted a Petition for modification of the filing requirements contained in WAC 480-100-275 in Docket No. UE-072123, seeking an indefinite thirty-day extension of time to file its actual results for Washington operations. In that Petition, the Company also requested that the thirty-day extension be applied to its report on environmental remediation expenditures. In Order No. 01, the Commission granted a modification, allowing the Company to file its actual results for Washington operations reports ninety days from the end of the quarter for the quarters ending September 30, 2007, through December 31, 2009. Order No. 01 also allowed the Company to file its environmental remediation expenditures every other quarter with the actual results for Washington operations reports.

5. On March 23, 2010, in Docket No. UE-072123, PacifiCorp submitted an additional Petition for modification of the filing requirements contained in WAC 480-100-275 requesting that the thirty day extension for reporting its actual results for Washington operations be effective through the five-year trial period of the WCA inter-jurisdictional allocation methodology. In Order No. 02, the Commission granted the requested modification, allowing the Company to file its actual results for Washington operations reports ninety days from the end of the quarter through the quarter ending June 30, 2012. Order No. 02 also allowed the Company to file its environmental remediation expenditures every other quarter with the actual results of operations reports.

6. The use of the WCA allocation methodology was granted in Order No. 08, Docket No. UE-061546 & UE060817 (combined) for a five-year evaluation period. In Order No. 07, Docket No. UE-111190, the Commission approved an extension of the time to report back to the Commission on the evaluation of the WCA inter-jurisdictional allocation methodology until January 31, 2013. Although an evaluation of the WCA inter-jurisdictional methodology is due to the Commission, the Company must continue to report results using this methodology until an alternative method is approved by the Commission.

7. The Company's circumstances remain unchanged from the prior requests for modification of the requirements contained in WAC 480-100-275. The total Company data necessary to finalize the reporting of the actual results for Washington operations becomes available within sixty days of the end of the quarter. This data then needs to be analyzed to determine the data related only to the Company's West Control Area inter-jurisdictional allocation methodology. In order to ensure that its reporting of actual results for Washington operations under the WCA allocation methodology is accurate, commencing with the quarter ending September 30, 2012, PacifiCorp requests a continuation of the thirty-day extension previously granted by the Commission. The Company requests that this modification be effective until an alternative methodology is approved by the Commission.

8. Additionally, the Company includes a report of environmental remediation expenditures on a semi-annual basis as part of the quarterly results of operations filing, pursuant to Order No. 01 in Docket No. UE-031658. For procedural efficiency and to reduce administrative burden, the Company also requests that the environmental

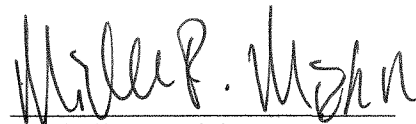
remediation expenditures report continue to be provided with the quarterly results reports and that the thirty-day extension also be applied. The Commission previously granted similar requests in Order No. 01 and No. 02, Docket UE-072123.

9. The Commission may grant a modification of its rules “if consistent with the public interest, the purposes underlying the regulation, and applicable statutes” (WAC 480-07-110(1)). PacifiCorp’s petition is consistent with these standards. The public interest and the purposes underlying the quarterly reporting requirements will be best served by granting the additional thirty-day extension to allow the accurate reporting of actual results for Washington operations under the WCA allocation method.

10. PacifiCorp respectfully requests a thirty-day extension of time in which to file its actual results for Washington operations report, beginning with the quarter ending June 30, 2012, until an alternative methodology is adopted by the Commission. In addition, the Company requests that the thirty day extension be applied to the semi-annual environmental remediation expenditures report for the same time period.

DATED: this 15 day of August, 2012.

Respectfully submitted,



Michelle R. Mishoe
Legal Counsel
Pacific Power
825 NE Multnomah, Ste 1800
Portland, OR 97232