

McDowell Rackner & Gibson PC



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September 14, 2012

David W. Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

RE: *WUTC v. PacifiCorp (PacifiCorp 2010 General Rate Case)*
Docket UE-100749

Dear Mr. Danner:

PacifiCorp has reviewed Staff's request for a six business day extension, until September 26, 2012, to file comments on PacifiCorp's Petition for Stay and Petition for Reconsideration and Motion to Re-Open the Record. Staff also requested the same six business day extension on the 30-day compliance filing deadline and the 90-day mechanism filing deadline in Order 10, Paragraphs 74 and 75.

PacifiCorp does not oppose Staff's request for an extension but requests that the Commission temporarily suspend the compliance deadlines in Order 10, Paragraphs 74 and 75, until the Commission resolves PacifiCorp's Petition for Stay. Otherwise, the passage of time could result in an effective denial of the Petition for Stay.

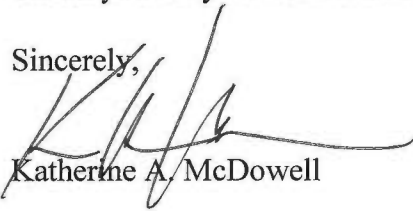
In addition, if the Commission denies PacifiCorp's Petition for Stay, the Company requests that the Commission extend the compliance deadlines in Order 10 to 30 days and 90 days from the resolution of PacifiCorp's Petition for Reconsideration.

Given the importance and complexity of the issues involved in the petitions, PacifiCorp respectfully requests the opportunity to file a reply to the other parties' comments by October 15, 2012. With Staff's requested extension, other parties will have more than 3 weeks to respond to the petitions. PacifiCorp had only 10 days to prepare and file the petitions. Under these circumstances, allowing PacifiCorp an opportunity to file reply comments is equitable and ensures full development of the record.

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Thank you for your consideration of PacifiCorp's position on these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "K. McDowell", written over the printed name.

Katherine A. McDowell

cc: Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that I have this 14th day of September, 2012, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

David S. Danner	<input type="checkbox"/>	Hand Delivered
Secretary and Executive Director	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Washington Utilities and Transportation	<input checked="" type="checkbox"/>	Overnight Mail (UPS)
Commission	<input type="checkbox"/>	Facsimile (360) 586-8203
1300 S Evergreen Park Drive SW	<input checked="" type="checkbox"/>	Email (records@wutc.wa.gov)
PO Box 47250		
Olympia, WA 98504-7250		

I hereby certify that I have this 14th day of September, 2012, served a true and correct copy of the foregoing document upon parties of record, via the method(s) noted below, properly addressed as follows:

On Behalf Of Public Counsel:

Sarah Shifley	<input type="checkbox"/>	Hand Delivered
Simon ffitch	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
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On Behalf Of ICNU:

Irion Sanger	<input type="checkbox"/>	Hand Delivered
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On Behalf Of Commission Staff:

Donald Trotter	<input type="checkbox"/>	Hand Delivered
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On Behalf Of PacifiCorp:

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 14th day of September, 2012, at Portland, Oregon.



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Of Attorneys for PacifiCorp