

600 University Street, Suite 3600 Seattle, Washington 98101 main 206.624.0900 fax 206.386.7500 www.stoel.com

JASON B. KEYES

Direct (206) 386-7681
jbkeyes@stoel.com

April 27, 2006

## ELECTRONIC MAIL AND HAND DELIVERED

<records@wutc.wa.gov>

Ms. Carole J. Washburn Executive Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW Olympia, WA 98504-7250

Re: Docket Nos. UE-050684 and UE-050412

Dear Ms. Washburn:

Enclosed for filing in the above proceedings are an original and 18 copies of PacifiCorp's Motion to Consolidate the docket established for its April 27, 2006 filing with consolidated Docket Nos. UE-050684 and UE-050412. An electronic copy of the filing will also be sent to the Commission's record center.

Thank you for your assistance.

Sincerely,

Jason B. Keyes

JBK:jlf Enclosures

cc: Service List

## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	
Complainant,	Docket No. UE-050684
v.	
PACIFICORP, d/b/a PACIFIC POWER & LIGHT COMPANY,	
Respondent.	
In the Matter of the Petition of	
PACIFICORP, d/b/a PACIFIC POWER & LIGHT COMPANY	Docket No. UE-050412
For an Order Approving Deferral of Costs Related to Declining Hydro Generation	
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	
Complainant,	Docket No. UE-06
v.	
PACIFICORP, d/b/a PACIFIC POWER & LIGHT COMPANY,	MOTION TO CONSOLIDATE
Respondent.	
PacifiCorp dba Pacific Power & Light C	ompany ("PacifiCorp") moves to consolidate the
docket established for its April 27, 2006 filing for	or an increase in revenues for Washington
operations not to exceed 2.99 percent for each c	ustomer class (the "2.99 Percent Rate Increase

MOTION TO CONSOLIDATE - 1

Filing") with consolidated Docket Nos. UE-050684 and UE-050412.

1

2

The reasons for consolidation are twofold. The first reason is administrative efficiency, as key issues related to the need for the requested rate increase in the 2.99 Percent Rate Increase Filing have been fully litigated, and have either been resolved or are ripe for resolution, in consolidated Docket Nos. UE-050684 and UE-050412. The second reason is the advancement of just and reasonable ratemaking, as the 2.99 Percent Rate Increase Filing affords the Washington Utilities and Transportation Commission with one means of providing PacifiCorp with a portion of the rate relief it has justified in consolidated Docket Nos. UE-050684 and UE-050412.

3

Wherefore, PacifiCorp respectfully requests the motion be granted consolidating the dockets as requested herein.

DATED: April 27, 2006.

Respectfully submitted,

Stoel Rives LLP

Ву

James M. Van Nostrand

Jason B. Keyes

Of Attorneys for PacifiCorp

## CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing document upon the parties of record in this proceeding by first-class mail and electronic mail, addressed to said parties/attorneys' addresses as shown below:

Melinda J. Davison Irion Sanger Davison Van Cleve, P.C. 333 SW Taylor, Suite 400 Portland, OR 97204

Email: mjd@dvclaw.com ias@dvclaw.com

Simon J. ffitch Public Counsel Section Office of Attorney General 900 Fourth Avenue, Suite 2000 (TB-14) Seattle, WA 98164-1012

Email: simonf@atg.wa.gov

Ralph Cavanagh Natural Resources Defense Council 111 Sutter Street, 20th Floor San Francisco, CA 94104

Email: rcavanagh@nrdc.org

Robert D. Cedarbaum Office of the Attorney General Utilities and Transportation Division 1400 S Evergreen Park Drive SW Olympia, WA 98504-0128

Email: bcedarba@wutc.wa.gov

DATED: April 27, 2006.

Randall J. Falkenberg RFI Consulting, Inc. 8351 Roswell Road PMB 362 Atlanta, GA 30350

Email: consultrfi@aol.com

Donald T. Trotter
Office of the Attorney General
1400 S. Evergreen Park Drive SW
PO Box 40128
Olympia, WA 98504-0128

Email: dtrotter@wutc.wa.gov

Brad M. Purdy Attorney at Law 2019 North 17th Street Boise, ID 83702

Email: bmpurdy@hotmail.com

Jasøn B. Keyes