

**VIA ELECTRONIC FILING**

January 11, 2007

Carole Washburn, Executive Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, Washington 98504-7250

**Re: Petition for Exemption from WAC 480-100-238**

Dear Ms. Washburn:

PacifiCorp respectfully requests an exemption from WAC 480-100-238 and an extension of time to file its Integrated Resource Plan (“IRP”) from January 20, 2007 to March 30, 2007. PacifiCorp further requests expedited consideration and approval of its request by the Commission at the January 24, 2007 open meeting.

Pursuant to WAC 480-100-238, PacifiCorp is required to file its IRP within two years after the date on which the previous plan was filed with the Commission. PacifiCorp last filed an IRP on January 20, 2005. PacifiCorp submits this expedited request for the following reasons:

- (1) PacifiCorp has received significant feedback from stakeholders regarding the IRP. PacifiCorp is actively incorporating feedback into the IRP, which is taking more time and resources than originally anticipated;
- (2) PacifiCorp is currently seeking approval in Utah and Oregon of its 2012 Request for Proposal (“RFP”) to procure additional long-term resources. Neither state has yet approved the draft RFP. The Company intends to take information gained from the above events into consideration in its IRP to make the process as meaningful as possible; and
- (3) On January 8, 2007, the Oregon Public Utility Commission (OPUC) issued Order No. 07-002 in Docket No. UM 1056 (Investigation into Integrated Resource Planning) adopting new integrated resource planning guidelines. Among other things, Order No. 07-002 requires PacifiCorp to convene a public input meeting prior to filing the IRP which will be held on February 1, 2007. Following additional public input, PacifiCorp will promptly incorporate any feedback and finalize the IRP for filing.

In granting PacifiCorp's request, PacifiCorp will be better able to serve its stakeholder interests and provide the Commission with a comprehensive and achievable IRP. For the Commission's convenience, attached to PacifiCorp's request is a proposed order.

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

Very truly yours,

A handwritten signature in cursive script that reads "Andrea Kelly /MAS". The signature is written in black ink and is positioned above the typed name and title.

Andrea Kelly  
Vice President, Regulation