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March 26, 2009

Patricia Clark, Administrative Law Judge
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

RE: *WUTC v. PacifiCorp (2009 General Rate Case)*
Docket UE-090205

Dear Judge Clark

Regarding Order 04, Prehearing Conference Order (March 24, 2009), I wish to bring to your attention two possible ambiguities and one possible unintended omission. At this point, we seek only clarification; we are not advocating for a particular result.

First, the prehearing conference order at ¶11 states that the conversion factor “should constitute six digits.” This language could mean six total digits (e.g., 46.0123), or six digits to the right of the decimal (e.g., 46.012345). There was discussion of this on the record, but that discussion is not explicitly reflected in the order. In either example, an explicit rounding rule would also be helpful, because in EXCEL, a figure may appear as a six digit figure, when in fact it has more digits.

The Commission could use the following language to clarify this issue, (filling in the blanks with what the Commission wants the parties to use): “The conversion factor should be stated as a number with ___ digits to the right of the decimal, (such as _____), and rounded to the last digit.”

Second, the prehearing conference order at ¶11 states that the rate of return should be “rounded to two decimal points.” Among other meanings, this language could mean “state



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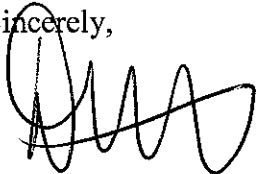
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the rate of return as a percentage, rounded to two decimal points" (e.g., 8.22%) or it could mean "state the rate of return as a number, rounded to two decimal points" (e.g., .08).

Finally, the procedural schedule in Appendix B to the prehearing conference order does not contain the settlement conference the parties proposed for September 10, 2009.

Thank you for your attention to these matters.

Sincerely,

A handwritten signature in black ink, appearing to read 'DTT', with a large, stylized initial 'D' and several loops.

DONALD T. TROTTER
Assistant Attorney General

DTT:klg

Enclosures

cc: Parties