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April 28, 2000

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STATE OF WASH, UTIL. AND TRANSP. COMMISSION

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VIA FACSIMILE

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

Re: Application of PacifiCorp for an Order Approving Sale of Centralia Docket No. UE-991262

Dear Ms. Washburn:

Pursuant to WAC 480-09-460(5), PacifiCorp hereby requests an order conference with respect to the Second and Fourth Supplemental Orders issued by the Commission in the above proceeding. WAC 480-09-460(5) provides in relevant part that:

On the Commission's own motion or at the request of any party, the commission may schedule an order conference at which parties may ask clarification of the meaning of a final order entered or to be entered by the commission. . . . The purposes of the conference are to allow parties to ask clarification of the meaning of an order so that compliance may be enhanced and any compliance filing may be accurately prepared and presented, and to discover technical changes that may be required to correct the application of principle to data or to correct patent error without the need for parties to request reconsideration and without delaying post-order compliance.

PacifiCorp has unresolved questions regarding two particular aspects of the Commission's decisions, the "application of the Commission's methodology for calculating and sharing the gain" and the "source of numerical references sought by PacifiCorp."

¹ Second Supplemental Order Approving Sale With Conditions (issued March 6, 2000) and Fourth Supplemental Order Granting Reconsideration in Part; Providing Clarification; Denying Petition to Reopen (issued April 21, 2000).

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PacifiCorp is required under the orders to recalculate the gain on the sale to match the date that the sale closes and provide that figure to the Commission. (Second Supplemental Order, paragraph 161) Treatment of the customer share of the gain, in turn, is deferred as an issue for consideration in PacifiCorp's current general rate proceeding, Docket No. UE-991832. (Id., paragraph 77) An order conference will assist in clarifying the above-referenced aspects of the orders, thereby enabling PacifiCorp to achieve compliance with the Commission orders and eliminating or minimizing any controversy regarding implementation of the orders in PacifiCorp's current general rate proceeding. Given that the closing of the transaction is still pending, PacifiCorp respectfully requests that the order conference be convened as soon as is reasonably practicable.

Thank you for your assistance.

Very truly yours,

Stoel Rives LLP

George M. Galloway
Counsel for PacifiCorp

cc: Service List
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Andrea Kelly

GMG:jmv

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