



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

October 30, 2007

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

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

**Re: Petition of PacifiCorp, dba Pacific Power & Light, for Modification of WAC
480-100-275 Filing Requirements**

Dear Ms. Washburn:

In accordance with WAC 480-07-370, WAC 480-07-395 and WAC 480-07-110,
enclosed for filing are an original and twelve (12) copies of the above-mentioned petition.

It is respectfully requested that all data requests for Pacific Power be addressed in the
following manner with copies to the Company's counsel:

By Email (preferred): datarequest@pacificcorp.com

By Facsimile: (503) 813-6060

By Regular Mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Please direct any informal inquiries to Shay LaBray, Regulatory Affairs Manager, at
(503) 813-6176.

Sincerely,

Andrea L. Kelly
Vice President, Regulation

Enclosures

cc: Thomas Schooley

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

In the Matter of

PACIFICORP, dba PACIFIC POWER

Petition for Modification to Actual Results
for Washington Operations Report
Requirements.

DOCKET UE- _____

PACIFICORP'S PETITION FOR
MODIFICATION OF WAC 480-100-275

1. Pursuant to WAC 480-100-008 and WAC 480-07-110(1), PacifiCorp, d.b.a. Pacific Power ("Pacific Power" or "Company"), hereby petitions the Washington Utilities and Transportation Commission ("Commission") for a modification of the Actual Results for Washington Operations Report filing requirements contained in WAC 480-100-275.

2. Pacific Power's name and address:

PacifiCorp Washington Dockets
825 NE Multnomah, Ste 2000
Portland, OR 97232
Washington.Dockets@PacifiCorp.com

Michelle R. Mishoe
Legal Counsel
825 NE Multnomah
Portland, OR 97232
Phone: (503) 813-5977
Fax: (503) 813-7252
michelle.mishoe@pacificorp.com

3. WAC 480-100-275 requires electric utilities to file actual results of Washington operations within sixty days of the end of each quarter. Pacific Power filed its first quarter 2007 report on March 31, 2007 and was scheduled to file its report for the quarter ending June 30, 2007 on August 29, 2007. On June 21, 2007, the Commission issued Order No. 8 in Docket No. UE-061546, approving PacifiCorp's West Control Area ("WCA") inter-jurisdictional cost allocation methodology, with modifications. To

accurately implement the new allocation methodology, Pacific Power requested additional time to report actual results for the second quarter. This request was approved in Order 01 Docket No. UE-071467. On September 28, 2007, PacifiCorp subsequently filed its second quarter results of operations in compliance with the order.

4. The total company data necessary to finalize the reporting of the actual results of operations becomes available within sixty days of the end of the quarter. This data then needs to be analyzed to determine the data related only to the Company's West Control Area. Therefore, Pacific Power requests an extra thirty days to ensure that its reporting of Washington's actual results of operations under the WCA allocation methodology is accurate. The Company requests an indefinite thirty day extension for quarterly results of operations, meaning the Company would file its report ninety days after the end of each quarter.

5. The Company includes a report of environmental remediation expenditures on a semi-annual basis as part of the quarterly results of operations filing, pursuant to Order No. 01 in Docket No. UE-031658. For procedural efficiency and to reduce administrative burden, the Company also requests that the environmental remediation expenditures report continue to be provided with the quarterly results reports and that the thirty day extension also be applied.

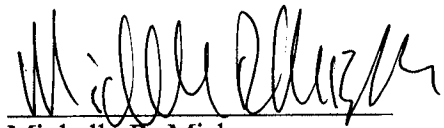
6. The Commission may grant a modification of its rules "if consistent with the public interest, the purposes underlying the regulation, and applicable statutes." WAC 480-07-110(1). Pacific Power's petition is consistent with these standards. The public interest and the purposes underlying the quarterly reporting requirements will be best served by granting the additional thirty day extension to allow the accurate reporting of

Washington's actual results of operations under the WCA allocation method.

7. Pacific Power respectfully requests an indefinite thirty day extension of time in which to file its Actual Results for Washington Operations Report and the semi-annual environmental remediation expenditures report.

DATED: this 30th day of October, 2007.

Respectfully submitted,



Michelle R. Mishoe
Legal Counsel
Pacific Power
825 NE Multnomah, Ste 1800
Portland, OR 97232