



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

March 18, 2009

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

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

Attention: David W. Danner
Executive Director and Secretary

Re: Docket No. UE-_____
PacifiCorp's Petition for Modification of Filing Date for its Integrated Resource
Plan Pursuant to WAC 480-100-238

Dear Mr. Danner:

Enclosed for filing are an original and twelve (12) copies of PacifiCorp's Petition for Modification of Filing Date for its Integrated Resource Plan ("IRP") Pursuant to WAC 480-100-238. An electronic copy of the filing will also be sent to the Commission's record center.

Communications regarding this petition should be addressed to:

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

Michelle Mishoe
PacifiCorp
825 NE Multnomah, Suite 1800
Portland, OR 97232
Michelle.Mishoe@PacifiCorp.com

In addition, PacifiCorp requests that all data requests regarding this petition be addressed to:

By E-mail (preferred): datarequest@PacifiCorp.com

By Facsimile: (503) 813-6060

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

Washington Utilities and Transportation Commission

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Please direct any informal questions to Cathie Allen @ 503-813-5934.

Sincerely,

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

Andrea L. Kelly
Vice President, Regulation

Enclosure

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PACIFICORP, d.b.a. Pacific Power,

Petitioner

DOCKET NO. UE- 09 _____

PacifiCorp's Petition for Modification of
Filing Date for its Integrated Resource Plan
Pursuant to WAC 480-100-238

1. Pursuant to WAC 480-100-238(4) and WAC 480-07-370(b), PacifiCorp, d.b.a Pacific Power ("Company") petitions ("Petition") the Washington Utilities and Transportation Commission ("Commission") for a modification of the date for filing the Company's Integrated Resource Plan ("IRP") in accordance with WAC 480-100-238. In support of this Petition, the Company states:

2. PacifiCorp is an electric company and public service company in the State of Washington within the meaning of RCW 80.04.010, and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Washington. PacifiCorp provides electric service to approximately 130,000 retail customers in Washington.

3. PacifiCorp'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
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michelle.mishoe@pacificorp.com

4. WAC 480-100-238(4) states, "Unless otherwise ordered by the commission, each electric utility must submit a[n] [IRP] within two years after the date on which the previous plan was filed with the commission. Not later than twelve months prior to the

due date of a plan, the utility must provide a work plan for informal commission review.” In compliance with Commission order, the Company is required to file its IRP on January 20 of each odd numbered year. On August 8, 2008, the Company filed a petition requesting an amendment to the filing date for its IRP to more closely align the IRP process with the business planning process and modified modeling procedures. In Order 01, Docket UE-081475, the Commission granted the petition, making the Company’s IRP filing date March 31 of each odd numbered year.

5. Due to a recent change in the status of a major planned resource, the Company has determined that additional analysis is required to ensure the IRP reflects these changes. The Company understands the Commission’s reluctance to grant extensions of time to file IRPs, as expressed in Order 01, Docket UE-070117, and the Company is prepared to file an IRP in Washington, as required, by March 31, 2009. However, because of the additional analysis, the Company would need to update or supplement this IRP at a later date. During a discussion with parties from Washington, Idaho, Oregon, Utah, and Wyoming regarding the Company’s additional analysis, Washington Commission staff (“Commission staff”) expressed a preference for receiving a complete IRP at one time instead of receiving updates. At the direction of staff, the Company is filing this petition to request a one-time extension for filing the IRP. The Company proposes filing the IRP by May 29, 2009 to accommodate Commission Staff’s request.

6. On February 11, 2009, the Company delivered a formal written notice to the developers of the Lake Side 2 combined-cycle plant for termination of the Master Development, Engineering, Procurement and Construction Agreement. This resource was included in the Company’s 2008 IRP as a planned resource with a 2012 in-service date.

The decision to seek more cost-effective resource alternatives was driven by the worsening recessionary environment, continued declines in forward electricity and gas prices, the favorable outlook for future plant construction costs, and additional transmission import capability into Utah of which the Company has recently become aware.

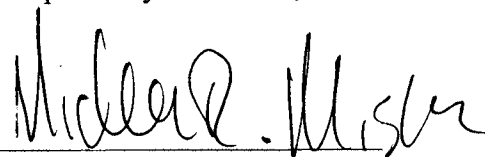
7. The construction termination decision occurred after selection of the 2008 IRP preferred portfolio, but before finalization of the IRP document and preparation of the IRP action plan. Consequently, the Company decided to conduct additional portfolio analysis to determine the impacts of excluding Lake Side 2 as a planned resource, and then update the preferred portfolio and develop the IRP action plan accordingly. Reflecting this resource decision in the current IRP is in the public interest and critically important given the size of the resource need in the 2012 to 2014 timeframe and its associated portfolio cost impact. The Company also developed a load forecast reflecting an updated assessment of recessionary impacts on load growth throughout the Company's service territory. It is important to conduct IRP portfolio analysis with this information.
8. The Company is also conducting supplementary resource acquisition risk analysis and wind integration cost analysis that cannot be completed and incorporated into the IRP in time to meet the March 31 filing date. Such information would need to be filed with the Commission as a report supplement at the time the IRP is filed with other state public utility commissions.
9. Due to these vital additional analytical requirements, the Company cannot complete the revised IRP in time to provide a 30-day public comment and response

period and file the IRP with the Commission by March 31, 2009. A May 29 filing date, for the 2009 filing only, provides sufficient time to complete the analysis and provide for the 30-day comment and response period.

10. Further, allowing this modification to the Company's IRP filing for 2009 is in the public interest. This will allow the Company to provide the most current analysis of the effects of recent business decisions and economic factors on resource needs and will allow for timely public review of such analysis.
11. For these reasons, the Company respectfully requests that the Commission modify the filing deadline to May 29, 2009 for the 2009 IRP filing. The Company is prepared to file the IRP in Washington, as required, by March 31, 2009. However, this filed IRP would not benefit from a thorough public review prior to filing, and, as indicated above, would exclude useful action plan and wind integration cost information that the Company would provide at a later date. Commission staff also supports a revised IRP filing date, and recommended that the Company file this Petition. 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). The Company's Petition meets these standards.

DATED: this 18th day of March, 2009.

Respectfully submitted,



Michelle R. Mishoe
Legal Counsel, Pacific Power

Counsel for PacifiCorp