

August 8, 2008

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

Mr. David Danner  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504-7250

**RE: Docket No. UE-08 \_\_\_\_\_  
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 Pursuant to WAC 480-100-238. An electronic copy of the filing will also be sent to the Commission's record center. Also enclosed is a motion for protective order seeking entry of a standard protective order in this proceeding.

Communications regarding this petition should be addressed to:

Washington Dockets  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
[washingtondockets@PacifiCorp.com](mailto:washingtondockets@PacifiCorp.com)

Michelle Mishoe  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
[Michelle.Mishoe@PacifiCorp.com](mailto: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](mailto:datarequest@pacificorp.com)

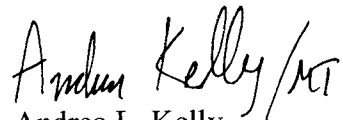
By Facsimile: (503) 813-6060

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

Washington Utilities & Transportation Commission  
August 8, 2008  
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Please direct any informal questions to Michelle Mishoe at 503-813-5977.

Respectfully,

A handwritten signature in black ink that reads "Andrea Kelly" followed by a stylized monogram or initials "AK".

Andrea L. Kelly  
Vice President, Regulation

Enclosures

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of  
  
PACIFICORP, d.b.a. Pacific Power,  
  
Petitioner

DOCKET NO. UE- \_\_\_\_\_

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.

2. PacifiCorp's name and address:

PacifiCorp Washington Dockets  
825 NE Multnomah, Ste 2000  
Portland, OR 97232  
[Washington.Dockets@PacifiCorp.com](mailto: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](mailto:michelle.mishoe@pacificorp.com)

3. 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.<sup>1</sup>

4. In practice, the Company developed an IRP improvement strategy for the main purposes of aligning the IRP process more closely with the business planning process and

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<sup>1</sup> The Commission previously granted the Company a one-time extension of time to file its final 2006 IRP on May 30, 2007 instead of January 20, 2007. The Commission stated the Company must file its 2009 IRP in accordance with the previous filing deadline of January 20, 2009. See Order 2, Docket UE-070117.

to revise the modeling procedures to expand portfolio risk analysis. The Company's IRP improvement strategy consists of a coordinated work schedule centered on adoption of a standardized annual IRP modeling process that accounts for all regulatory IRP analysis and public participation requirements. In addition to providing corporate benefits in the form of consistent planning assumptions, this strategy addresses concerns voiced by some IRP public participants on planning transparency, the role of the IRP in overall corporate resource decision-making, and the detailed assessment of customer impacts.

5. Beginning with the 2008 IRP, integrated resource planning will inform the Company's overall business planning process as well as maintain input assumption coordination with the business plan throughout the annual planning cycle. This closer alignment recognizes the importance of the IRP in the context of the overall business plan, including its link to financeability and overall rate impacts on customers.

6. The IRP improvement strategy includes a ten-step process for IRP modeling. Additionally, the IRP improvement strategy allows for better input updates, greater public participation and successive refinement of business planning assumptions so that adjustments to the resource portfolio may be made and provided to interested parties for additional comments and review prior to issuing a draft IRP. After a thorough evaluation, the draft IRP will be made available for a 30-day public review and comment period before the final IRP is issued. While this represents a significant improvement in the Company's overall planning process, additional time is required to complete the evaluation and allow for a 30-day public comment period. Finally, the IRP process will include a new step to evaluate how the type, timing and quantity of resources in the preferred portfolio could vary based on alternative regulatory and market conditions. This

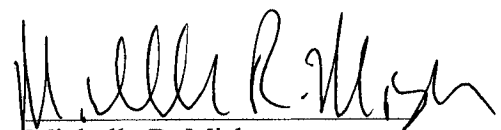
step—to be used to develop a resource acquisition contingency plan—is estimated to take an additional three to four weeks to complete after the preferred portfolio has been approved by the MidAmerican Energy Holdings Company board of directors. As a result, the IRP is not expected to be finalized in time to meet the Commission’s January 20 filing deadline.

7. Further, improving the Company’s IRP process is in the public interest because it will provide for the better planning of resource acquisitions and will allow for even greater public participation in the planning process.

8. For these reasons, the Company respectfully requests that the Commission modify the filing deadline for the Company’s IRP to March 31 of each odd-numbered year, commencing with the 2008 IRP being filed by March 31, 2009. 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 9<sup>th</sup> day of August, 2008.

Respectfully submitted,



Michelle R. Mishoe  
Legal Counsel, Pacific Power

Counsel for PacifiCorp