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October 1, 2015

***VIA ELECTRONIC FILING***

***AND OVERNIGHT DELIVERY***

Steven V. King

Executive Director and Secretary

Washington Utilities and Transportation Commission

1300 S. Evergreen Park Drive SW

P.O. Box 47250

Olympia, WA 98504-7250

**RE: Docket UE-132047—Petition to Modify Order and Associated Conditions to Comply with WAC 480-109**

In accordance with WAC 480-07-370, WAC 480-07-875, and General Order R-578 in Docket UE-131723, Pacific Power & Light Company, a division of PacifiCorp (Pacific Power or Company), petitions the Commission to modify certain provisions of Order 01 and Attachment A to Order 01 in Docket UE-132047 (hereinafter referred to as Order 01 and Attachment A, respectively).

General Order R-578 directed utilities to review previous Commission orders that discuss the requirements adopted in WAC 480-109. To the extent of any conflicts between previous orders and the newly adopted rules, the utilities were directed to petition the Commission for modification of the relevant order(s) within 30 days of the effective date of the rules.

The Company reviewed the requirements set forth in Order 01 and Attachment A at the time the new rules were adopted and, at that time, did not identify a need to change Order 01 or Attachment A. After discussions with Commission staff, however, the Company was made aware of the desire to have Order 01 and Attachment A updated to reflect the current rules. This was also brought up at the DSM Advisory Group meeting on August 20, 2015. The Company respectfully requests the Commission consider this late-filed petition to bring Order 01 and Attachment A into conformance with the current rules.

The Company is currently preparing to submit its new Ten-Year Conservation Potential and 2016-2017 Biennial Conservation Target (Ten-Year Conservation Plan) on October 30, 2015. References made to Order 01 and Attachment A in the Ten-Year Conservation Plan will reference the proposed revisions to the order and attachment language, as the proposed revisions bring the order and the attachment into conformance with the current rules.

It is respectfully requested that any formal correspondence and staff requests regarding these reports be addressed to:

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| By e-mail (preferred):  By regular mail: | [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  Data Request Response Center  PacifiCorp  825 NE Multnomah Street, Suite 2000  Portland, OR 97232 |

Please direct informal questions to Ariel Son, Manager, Regulatory Projects, at (503) 813-5410.

Sincerely,

R. Bryce Dalley

Vice President, Regulation

Enclosures