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June 11, 2008

**VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY**

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

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STATE OF WASH.
UTILITY & TRANSP.
COMMISSION

Attention: Carole Washburn
Executive Secretary

**Re: PacifiCorp, dba Pacific Power, Motion for Clarification Out of Time of
Order No. 1 in UE-072394, per WAC 480-07-835**

Dear Ms. Washburn:

In accordance with WAC 480-07-835, enclosed for filing are an original and twelve (12) copies of the above mentioned motion.

Informal questions should be directed to Cathie Allen, Regulatory Manager, at (503) 813-5934.

Sincerely,

Andrea L. Kelly
Vice President, Regulation

Enclosures

cc: Tom Schooley

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PACIFICORP, dba PACIFIC POWER &
LIGHT COMPANY,

Petitioner,

Seeking Exemption from the Provisions of
WAC 480-100-252 Requiring Electric
Companies to File the State Supplement to
the 2008 Annual Report FERC Form No. 1
by May 1, 2008

DOCKET UE- 072394

MOTION FOR CLARIFICATION OUT
OF TIME OF ORDER NO. 1

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1. Pursuant to WAC 480-07-835(1), PacifiCorp, d.b.a Pacific Power (“Company”), files this Motion for Clarification Out of Time (“Motion”) seeking clarification of the Washington Utilities and Transportation Commission’s (“Commission”) Order No. 1 in the above-captioned docket. In support of this Motion, the Company states:

2. On December 12, 2007, the Company filed a letter petition requesting a 30 day extension of time, to May 31, for filing the State Supplement for the FERC Form 1 Report (“State Supplement”) required under WAC 480-100-252. The FERC filing deadline is April 18 each year, with report data subject to revision up to the filing deadline. With the limited time between the FERC filing deadline and the Commission filing deadline coupled with the Company’s need to prepare a similar report for five other states, additional time to complete the State Supplement would be needed.

3. On February 28, 2008, the Commission issued Order No. 1. In the first paragraph, the Commission notes the Company’s preference for a permanent extension of time for filing the State Supplement. The Commission also notes Staff’s recommendation to grant

the permanent extension of time for filing the State Supplement. Paragraph 8 (Findings and Conclusions paragraph (6)) finds the request for the extension reasonable and grants the extension.

4. Order No. 1, paragraph 9 (Ordering paragraph (1)), states:

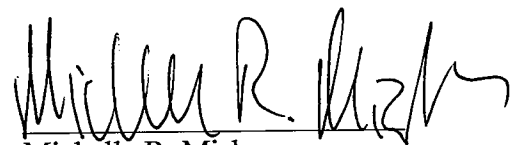
“PacifiCorp d/b/a Pacific Power & Light Company’s petition for an extension of time until May 31 **each year** to file the state supplement to its **2008** annual report is granted.” (Emphasis added).

As written, this paragraph appears to grant the permanent extension of time but then seems to apply the extension only to the 2008 State Supplement. The Company requests clarification on whether the grant of the extension is permanent or only applies to the 2008 State Supplement.

5. WAC 480-07-835(1) allows a party who does not seek to change the outcome of an order to file a motion for clarification of that order within 10 days of the order being served. The order is dated February 28, 2008, which makes this request out of time. Upon reviewing Order No. 1 in preparation for filing the 2008 State Supplement, the Company realized the uncertainty. The Company respectfully requests that the Commission consider this out of time motion and provide clarification so that the Company may comply with future State Supplement filing requirements.

DATED this 11th day of June, 2008.

Respectfully submitted,



Michelle R. Mishoe
Legal Counsel
Pacific Power