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January 30, 2007

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

Re: *In re Petition of Pacific Power & Light Co. for an Accounting Order*
Docket UE-060817
WUTC v. PacifiCorp d/b/a Pacific Power & Light Co.
Docket UE-061546

Dear Ms. Washburn:

Enclosed for filing each of the above-referenced dockets are the original and twelve (12) copies of the Motion for Consolidation, and Certificate of Service. This motion is filed by Commission Staff and PacifiCorp.

Sincerely,

DONALD T. TROTTER
Senior Counsel

DTT:tmw
Enclosures
cc: Parties



BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

PACIFIC POWER & LIGHT COMPANY

For an Accounting Order Approving
Deferral of Certain Costs Related to the
MidAmerican Energy Holdings Company
Transition.

DOCKET NO. UE-060817

MOTION FOR CONSOLIDATION

WASHINGTON UTILITIES &
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER &
LIGHT COMPANY,

Respondent.

DOCKET NO. UE-061546

MOTION FOR CONSOLIDATION

1 Commission Staff and PacifiCorp, d/b/a Pacific Power & Light Company (PacifiCorp or the Company) file this motion in each of the above dockets, seeking a Commission order consolidating the above dockets for hearing and disposition, and processed on the schedule the Commission has established in Docket UE-061546.

BACKGROUND

2 Docket UE-060817 was initiated by a “Petition of PacifiCorp for Accounting Order” (Petition) filed May 19, 2006. According to paragraph 4 of the Petition, PacifiCorp, d/b/a Pacific Power & Light Company (PacifiCorp or Company) is seeking “an accounting order authorizing capitalization of the transition costs through March 2007,” followed by an amortization period beginning April 1, 2007, or “at the implementation of the next general rate case.”

3 Among other things, these “transition costs” relate to severance payments PacifiCorp made to departing employees, and the cost of new software, all occasioned by the recent acquisition of PacifiCorp by MidAmerican Holdings Company. The Commission has not yet set the Petition for hearing.

4 Docket UE-061546 is a general rate case filed by PacifiCorp on October 3, 2006. It is the “next general rate case” referred to in the Petition. In the general rate case, PacifiCorp is proposing an accounting adjustment which reflects (in the calculation of the Company’s proposed rates) the relief the Company seeks in its Petition. Various parties to the general rate case have conducted discovery on this adjustment. The general rate case has been scheduled for hearing.

ARGUMENT

4 Docket UE-060817 and Docket UE-061546 should be consolidated for hearing and disposition, and processed on the schedule the Commission has established in Docket UE-061546.

5 The Commission has discretion to consolidate dockets for hearing and/or disposition. *WAC 480-07-320*. These dockets have common issues of fact regarding the treatment of “transition costs.” The existence of common issues of fact is a justification for consolidation recognized by the Commission. *Id.* Moreover, consolidation will promote efficiency, by bringing before the Commission in one docket all accounting issues related to these transition costs. The Commission can rule on them on a common record. Finally, there should be no reason for delay, because these issues have been the subject of discovery in the rate case docket, and Staff anticipates the same parties will be involved.¹

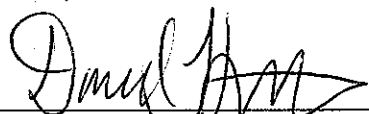
RELIEF REQUESTED

6 The Commission should issue an order consolidating Docket UE-060817 and Docket UE-061546 for hearing and disposition on the schedule the Commission has established in Docket UE-061546.

DATED this 30th day of January, 2007.

Respectfully submitted,

ROBERT M. MCKENNA
Attorney General



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¹ The Commission should issue a notice inviting additional intervention, but at the same time, the Commission should indicate that intervention by existing parties in the general rate case (Docket UE-606546) is unnecessary. One petition for intervention is on file in Docket UE-060817, from the Industrial Customers of Northwest Utilities (ICNU). ICNU is a party to the general rate case.

DATED this 30th day of January, 2007.

James M. Van Nostrand by
JAMES M. VAN NOSTRAND *D. Mad [Signature]*
Attorney at Law
Counsel for PacifiCorp *per telephone*
Perkins Coie, LLP *authorization*
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Docket No. UE-061546
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached document upon the persons and entities listed on the Service List below by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

DATED at Olympia, Washington this 30th day of January, 2007.



TALIA M. WILSON

Receive Confidential:

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