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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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IN THE MATTER OF THE ) DOCKET NO.  
APPLICATION OF PACIFICORP )  
FOR AN INCREASE IN RATES ) EMERGENCY MOTION OF  
 ) PACIFICORP FOR INTERIM  
 ) RATE RELIEF

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PacifiCorp ("Company"), hereby requests that the Public Service Commission of Utah ("Commission") authorize, pursuant to Utah Code Ann. Section 54-7-12(3)(a), an interim rate increase in the amount of \$142.2 million to be effective on January 22, 2000. In support of its request, PacifiCorp states as follows:

1. In its January 25, 2000 Order in Docket No. 99-057-20, the Commission concluded that the proper basis for interim rate relief under Utah Code Ann. Section 54-7-12(3)(a) is “record evidence that financial harm is likely in the absence of an interim award.” The Commission then granted interim relief based on an analysis of “financial harm indicators” and evidence of under-earning caused by “extraordinary” circumstances.

2. The evidence in this case establishes that the Company will experience serious financial harm unless the Commission grants the requested interim relief. On January 12, 2001, PacifiCorp filed its application in this docket seeking a general rate increase in the

amount of \$142.2 million. That rate increase is required in large part because of the unprecedented increase in the Company's purchased power expenses. As shown in the prefiled direct testimony of Mr. Matthew Wright, approximately \$95 million of the total request is attributable to the extraordinary cost of power purchases in the wholesale power market. (Wright Direct Testimony at 3).

3. In his prefiled Direct Testimony, Mr. Mark Widmer provides evidence that the Company's net power costs during the test period are approximately \$266 million higher than the Company's net power costs in its last Utah rate case. Mr. Widmer also provides testimony that the unprecedented increases in the market prices for purchase power show no signs of returning to historic levels. (Widmer Direct Testimony at 1-2, 3).

4. Mr. Wright provides evidence in his Direct Testimony that the Company's return on equity in Utah is 4.17 percent, which is well below the 11 percent return authorized by the Commission on May 24, 2000. (Wright Direct Testimony at 2). Since the Company is currently incurring and absorbing, as Mr. Widmer shows in his Direct Testimony, power costs that are dramatically higher than those included in current rates, the Company will not, in the absence of the requested interim relief, have an opportunity to earn a reasonable return on shareholder equity in the year 2001.

5. Ms. Karen Clark provides evidence in her Interim Testimony, which is filed under the terms of the Protective Order issued by the Commission in this Docket, that, based on the financial harm indicators relied on by the Commission in its order in Docket 99-057-20, immediate interim rate relief in the amount sought by the Company is required to avoid serious financial harm to the Company.

6. Attached to this Motion as Exhibit A is a proposed tariff sheet to implement the Company's requested interim increase in rates and charges of \$142.2 million in accordance with the direction from previous Commission interim rate orders.

7. Because of the serious financial situation facing the Company, PacifiCorp requests that the Commission schedule a hearing on this Motion on January 22, 2001 and grant the requested relief on that date.

WHEREFORE, PacifiCorp respectfully requests the Commission enter an Order approving the proposed interim tariff and granting PacifiCorp an interim rate increase in the amount of \$142.2 million, effective on January 22, 2001.

DATED this \_\_\_\_ day of January, 2001.

By \_\_\_\_\_  
Edward A. Hunter  
John M. Eriksson  
STOEL RIVES LLP  
Attorneys for PacifiCorp

## CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing APPLICATION to be served upon the following by United States mail, postage prepaid, at the addresses indicated on January 12, 2001:

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