

**BEFORE THE
PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of
PACIFICORP for Approval of Its Proposed
Electric Service Schedules & Electric Service
Regulations

DOCKET NO. 04-035-42

**MOTION FOR EXTENSION OF
TIME TO FILE FILING
REQUIREMENTS AND
DISCOVERY TASKFORCE
REPORTS**

PacifiCorp hereby moves the Public Service Commission of Utah (the “Commission”) for an extension of time to file the Filing Requirements and Discovery Taskforce Reports. In support of this motion, PacifiCorp represents as follows:

1. On July 30, 2004, PacifiCorp filed a Motion for Approval of a Test Period Stipulation (“Test Period Stipulation”). Parties to the Stipulation included PacifiCorp, the Division, the Committee, UAE, FEA and AARP. The Commission issued its Report and Order approving the Test Period Stipulation on October 20, 2004. The Test Period Stipulation created a Test Year Taskforce to study issues related to implementing the provisions of Utah Code Ann. § 54-4-4(3).

2. On February 14, 2005, PacifiCorp filed a Motion for Approval of a Stipulation Regarding Revenue Requirement, Rate Spread and Rate Design (“Stipulation”). Parties to the Stipulation included PacifiCorp, the Division, the Committee, UIEC, FEA, AARP, and the Kroger Co. On February 25, 2005, the Commission issued its Report and Order approving the Stipulation.

3. In Paragraph 18 of the Stipulation, the signatories agreed to the formation of a task force to discuss ideas to improve the efficiency of the exchange of information and discovery in cases before the Commission (“Discovery Taskforce”). The Discovery Taskforce is

to submit a report to the Commission explaining consensus positions and issues still in dispute by November 30, 2005.

4. By a letter dated February 24, 2005, the Division, Committee, PacifiCorp, Questar and UAE requested that the Commission establish a subgroup of the Test Year Taskforce with the specific responsibility to develop and propose rules for filing requirements, detailing the information a utility must file in connection with a general rate case (“Filing Requirements Taskforce”). The Filing Requirements Taskforce is to submit a copy of its proposals by December 15, 2005. The Commission agreed to the formation of the Filing Requirements Taskforce subgroup by letter sent to the parties on March 9, 2005.

5. Since the establishment of these taskforces, the Discovery and Filing Requirements Taskforces have met approximately once a month to discuss the issues within the purview of the taskforces. At the last taskforce meeting, the parties discussed the content and form of the reports to be filed on November 30, 2005 and December 15, 2005. Parties stated a preference to create a single joint report for the two taskforces given the overlapping issues within the taskforces. The parties are currently working on a draft combined report for the Discovery and Filing Requirements Taskforces; however, the parties discussed at the last meeting a preference for at least one additional meeting prior to the report’s submission. The parties agreed to request an extension of the time to file the joint report until January 15, 2005. No party expressed any objection to the extension.

6. In order to permit the filing of a joint report with comments on the various proposals and parties’ positions, PacifiCorp moves that the Commission extend the filing of the combined Discovery and Filing Requirements Taskforce report from November 30, 2005 and

December 15, 2005 respectively to January 15, 2005. All participants in the Taskforce process support the requested extension.

CONCLUSION

WHEREFORE, PacifiCorp respectfully requests that the Commission grant this motion and extend the date for the filing of the Discovery and Filing Requirements combined Taskforce report to January 15, 2005.

RESPECTFULLY SUBMITTED this 29th day of November 2005.

PACIFICORP

By _____
Edward A. Hunter
Jennifer H. Martin
Stoel Rives LLP

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of November, 2005, I caused to be served, via electronic mail, a true and correct copy of the foregoing Motion to the following:

Michael Ginsberg
Patricia Schmid
ASSISTANT ATTORNEY GENERAL
500 Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111
mginsberg@utah.gov
pschmid@utah.gov
Attorneys for Division of Public Utilities

Reed Warnick
Paul Proctor
ASSISTANT ATTORNEY GENERAL
160 East 300 South, 5th Floor
Salt Lake City, UT 84111
rwarnick@utah.gov
pproctor@utah.gov
Attorneys for Committee of Consumer
Services

Gary A. Dodge
Hatch James & Dodge
10 West Broadway, Suite 400
Salt Lake City, UT 84101
gdodge@hjdllaw.com

F. Robert Reeder
Vicki Baldwin
PARSONS BEHLE & LATIMER
One Utah Center
201 South Main Street, Suite 1800
P.O. Box 45898
Salt Lake City, UT 84145-0898
BobReeder@pblutah.com
VBaldwin@pblutah.com
Attorneys for UIEC

Dale F. Gardiner
PARRY ANDERSON & GARDINER
60 East South Temple, #1200
Salt Lake City, Utah 84111
dfgardiner@parrylaw.com
Attorneys for AARP

Thomas W. Forsgren
2868 Jennie Lane
Holladay, Utah 84117
twforsgren@msn.com
Attorneys for AARP

Mr. James Howarth
OO-ALC/JAN
6026 Cedar Lane, Bldg 1278
Hill AFB, UT 84056
James.howarth@hill.af.mil
Attorneys for FEA

Major Craig Paulson.
AFLSA/ULT
Utility Litigation Team
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403
Craig.Paulson@tyndall.af.mil
Attorneys for FEA

Michael L. Kurtz
Kurt J. Boehm
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Mkurtz@bkllawfirm.com
Attorneys for Kroger Company

J. Davidson Thomas
Genevieve D. Sapir
COLE, RAYWID & BRAVERMAN
1919 Pennsylvania Avenue, N.W.
Second Floor
Washington, D.C. 20006
Attorneys for Comcast Cable
dthomas@crblaw.com
gsapir @crblaw.com

Gerald H. Kinghorn
PARSONS KINGHORN HARRIS
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
ghk@pkplawyers.com
Attorneys for Nucor Steel

Michael D. Woods
Comcast Cable Communications, LLC
183 Inverness Drive West, Suite 200
Englewood, Colorado 80112
Attorneys for Comcast Cable
Michael_woods@cable.comcast.com

Laura Polacheck
AARP Utah
6975 S. Union Park Center, #320
Midvale, UT 84047
Lpolacheck@aarp.org

Utah Ratepayers Alliance
c/o Betsy Wolf
Salt Lake Community Action Program
764 South 200 West
Salt Lake City, UT 84101
bplenk@igd.org

Peter J. Mattheis
Shaun C. Mohler
BRICKFIELD, BURCHETTE, RITTS,
STONE
1025 Thomas Jefferson Street, N.W.
800 West Tower
Washington, D.C. 20007
PJM@bbrslaw.com
Attorneys for Nucor Steel

Stephen R. Randle
RANDLE, DEAMER & LEE
139 East South Temple, Suite 330
Salt Lake City, UT 84111-1169
ulaw@xmission.com
Attorneys for Utah Farm Bureau
Federation

Jerold G. Oldroyd
Angela W. Adams
BAALLARD SPAHR
201 South Main Street, Suite 600
Salt Lake City, UT 84111-2221
oldroydj@ballardspahr.com
Attorneys for Comcast Cable

Ron Binz
Public Policy Consultant
333 Eudora Street
Denver, CO 80220
rbinz@rbinz.com

Coralette M. Hannon
6705 Reedy Creek Rd.
Charlotte, NC 28215
Channon@aarp.org

Arthur F. Sandack
8 East Broadway, Ste 510
Salt Lake City, Utah 84111
asandak@itower.net

Marco Kunz
Million Solar Roofs Partnership
Salt Lake City Corporation
Salt Lake City, UT
Telephone: (303) 298-6741
Facsimile: (303) 298-6301
marco.kunz@slcgov.com

Richard Collins
Million Solar Roofs Partnership
Westminster College
1840 South 1300 East
Salt Lake City, UT 84105
Telephone : (801) 832-2665
Facsimile : (801) 832-3106
rcollins@westminstercollege.edu

Edward A. Hunter
Jennifer E. Horan
STOEL RIVES LLP
201 South Main Street, Suite 1100
Salt Lake City, Utah 84111
Telephone: (801) 328-3131
Facsimile (801) 578-6999
eahunter@stoel.com
jehoran@stoel.com

Rick Anderson
Kevin Higgins
Neal Townsend
ENERGY STRATEGIES
215 South State Street, Suite 200
Salt Lake City, UT 84111
Telephone: 801.355.4365
Facsimile: 801.521.9142
randerson@energystrat.com
khiggins@energystrat.com
ntownsend@energystrat.com

Sarah Wright
Million Solar Roofs Partnership
917 Second Ave.
Salt Lake City, UT 84103
Telephone 673-7156
swrightutah@earthlink.net

Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 800
Portland, OR 97232
datarequest@pacificorp.com

Doug Larson
PACIFICORP
201 South Main, Suite 2300
Salt Lake City, Utah 84140-0023
Telephone: (801) 220-2190
Fax: (801) 220-3116
Doug.larson@pacificorp.com
John_w.stewart@pacificorp.com