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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of )  
PacifiCorp and Scottish Power plc for )  
an Order Approving the Issuance of )  
PacifiCorp Common Stock. )  
)  
)

**DOCKET NO. 98-2035-04**  
**JOINT MOTION FOR**  
**APPROVAL OF**  
**STIPULATION**

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The Division of Public Utilities (“Division”), the Committee of Consumer Services (“Committee”), Scottish Power plc (ScottishPower) and PacifiCorp (collectively, the “Parties”) jointly move the Commission for approval of the Stipulation dated July 28, 1999 (“Stipulation”), a copy of which is attached hereto and by this reference incorporated herein.

In support of this motion, the Parties represent as follows:

1. In its direct testimony, ScottishPower proposed a program of service quality improvements, environmental commitments, cost savings and further commitments to low-

income customers, communities and employees to ensure that the merger provided benefits to PacifiCorp's Utah customers.

2. In their direct testimony, the Division and Committee identified additional risks and concerns that they believed should be addressed in order to ensure that the merger is in the public interest.

3. The Parties have held discussions over the course of several months regarding the risks and concerns identified by the Division and the Committee. As a result of those discussions, the Parties have entered into the Stipulation.

4. The Stipulation includes a total of 51 conditions. A number of the conditions mitigate the risks that have been identified by the Division, the Committee and other parties. In addition, the Stipulation includes commitments that ScottishPower and PacifiCorp have made to deliver benefits to PacifiCorp's customers. For example, condition number 43 sets forth their commitment to provide a merger credit to Utah retail tariff customers for a four-year period beginning in 2000.

4. The Parties believe that the Stipulation is in the public interest. The Parties also believe that the Stipulation establishes that the merger between PacifiCorp and ScottishPower is in the public interest.

Wherefore, the Parties request that the Commission enter an order approving the Stipulation.

Date: July 28, 1999.

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Assistant Attorney General

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## CERTIFICATE OF SERVICE

I hereby certify that I caused to be delivered, via facsimile, a true and correct copy of the foregoing **JOINT MOTION FOR APPROVAL OF STIPULATION** to the following named persons on the 28th day of July, 1999:

Michael Ginsberg - 366-0352  
Doug Tingey - 366-0352  
Peter Mattheis - 202 342-0807  
Bill Thomas Peters - 363-4378  
F. Robert Reeder - 536-6111  
William J. Evans - 536-6111  
Lee Brown - 534-1407  
Daniel Moquin - 538-7440  
Eric Blank - 303 786-8054  
Matthew F. McNulty - 534-0058  
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Steven W. Allred - 535-7640  
Paul T. Morris - 963-3366  
Stephen R. Randle - 531-0444  
Dr. Charles Johnson - 274-0075  
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