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*Attorneys for PacifiCorp*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Complaint of:	:	
DAMMERON VALLEY WATER WORKS,	:	
	:	
Complainant,	:	Docket No. 03-035-04
	:	
vs.	:	
	:	
PACIFICORP,	:	<b>MOTION FOR</b>
d/b/a Utah Power & Light Company,	:	<b>CONTINUANCE</b>
	:	
Respondent.	:	
	:	
	:	

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Pursuant to Utah Admin. Code R746-100-3(H), PacifiCorp, d/b/a Utah Power & Light Company (“PacifiCorp”), hereby respectfully moves for a continuance of the hearing in the above-captioned matter currently scheduled for December 22, 2003.

The ground for this motion is PacifiCorp’s need for more time to assess the power quality situation at Dammeron Valley Water Works (“Dammeron Valley”) prior to forming a reasonable assessment of the cause or causes of the apparently ongoing problems affecting Dammeron Valley’s pump motors, and the steps that either PacifiCorp, Dammeron Valley or both need to take to remedy those problems.

In response to the Commission's Report and Order issued on October 22, 2003 ("Order"), PacifiCorp placed a power quality monitor at the Dammeron Valley meter, with the intent of collecting data and reporting back to the Commission by September 2004, as contemplated in the Order. That monitor remains in place, and PacifiCorp has now provided Dammeron Valley with the first set of data recordings from the monitor. However, ongoing problems at Dammeron Valley and concerns about the quality of the data produced by the monitor have led PacifiCorp to recently place two additional, higher resolution monitors at Dammeron Valley—one at PacifiCorp's transformer and one at Dammeron Valley's pump house. These monitors were installed on December 15, 2003 and will not have been in place long enough by December 22 to allow a reasonable opportunity to collect and analyze data, and make a meaningful assessment of causes and solutions.

In addition, to assist in eliminating possible causes of the ongoing problems, PacifiCorp recently hired an outside expert consultant to assess the adequacy of Dammeron Valley's pump equipment, including single-phase protection and surge protection. This consultant traveled to Dammeron Valley with PacifiCorp engineers on December 15, 2003, speaking with the individuals responsible for installing and maintaining Dammeron Valley's pump equipment, conducting an initial inspection of PacifiCorp and Dammeron Valley's equipment, and obtaining from Dammeron Valley certain documentation regarding its equipment. Further communication with Dammeron Valley, and possibly further site inspections, will likely be necessary to work through and fix the problem or problems at Dammeron Valley.

In light of all of the above, PacifiCorp respectfully suggests that the parties' time is best spent at this point in doing further work to identify and correct ongoing problems rather than in preparing for and participating in a Commission hearing. To the extent that the Commission

seeks answers from PacifiCorp as to the cause(s) of the problems, PacifiCorp is not in a position at this time to provide a meaningful answer, and does not believe it likely that it will be in such a position—or indeed to reasonably speculate—by December 22, 2003.

For these reasons, PacifiCorp respectfully requests a continuance of the hearing currently scheduled for December 22, 2003. PacifiCorp recognizes the urgency of identifying and solving the ongoing problems but believes that approximately one month would be necessary to effectively collect and analyze data about PacifiCorp's and Dammeron Valley's equipment. In the alternative, if the Commission at this time merely seeks a status report of the current situation and the efforts underway to resolve it PacifiCorp respectfully suggests a party teleconference to report to the administrative law judge, and receive further direction from him if necessary.

Dated: December 18, 2003.

Respectfully submitted,

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John M. Eriksson  
David L. Elmont  
STOEL RIVES LLP

*Attorneys for PacifiCorp*

## CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2003 I caused a true and correct copy of the foregoing **MOTION FOR CONTINUANCE** to be served by fax and U.S. mail on the following:

Ms. Carol Thorpe, Manager  
Dammeron Valley Water Works  
1 Dammeron Valley Drive East  
Dammeron Valley, UT 84783

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