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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of PacifiCorp)
for Approval of a 2009 Request for Proposals)
for Flexible Resource)
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DOCKET NO. 05-035-47

PACIFICORP’S MOTION TO SUSPEND
PROCEDURAL SCHEDULE

Pursuant to the Utah Public Service Commission’s Rules of Practice and Procedure R746-100-3(H), PacifiCorp, doing business as Utah Power & Light (“PacifiCorp” or the “Company”), hereby requests that the Utah Public Service Commission (“Commission”) suspend the procedural schedule previously adopted in this proceeding to extend the time for party and Commission consideration and decision. In support of this application, PacifiCorp states as follows:

1. On June 27, 2005, pursuant to the provisions of the Energy Resource Procurement Act (“Procurement Act”), PacifiCorp filed a request for approval of its 2009 Request for Proposals for a Flexible Resource (“RFP 2009”). *See* Utah Code § 54-17-201(2)(b). PacifiCorp requested that the Commission issue an order approving 2009 RFP no later than 90 days after the filing date, as outlined in Utah Code § 54-17-201(2)(f), or by September 26, 2005.

2. On July 20, 2005, the Commission issued a Scheduling Order in this proceeding setting the time for filing questions on the draft RFP 2009 and for PacifiCorp to provide responses; the filing of comments by parties, the Independent Evaluator and by PacifiCorp; hearing dates and a date for a Commission order on the draft RFP 2009 (September 30, 2005).

3. On September 2, 2005, PacifiCorp filed a motion requesting an extension of the procedural schedule (“Motion”) in order to provide parties additional time to provide comments and to review the upcoming filing of the Company’s IRP Action Plan update. The Commission issued an order adopting a new schedule on September 12, 2005.

4. As indicated in PacifiCorp’s September 2, 2005 Motion, as part of its routine IRP update process, PacifiCorp is currently undertaking a review and update of its resource assumptions. On October 5, 2005, PacifiCorp held an IRP input meeting to notify parties that the update process indicated to PacifiCorp’s forecasted resource gap are that load curtailment renewals and Qualifying Facilities contract assumptions will reduce or delay the need for 2009. PacifiCorp expects to complete that update and file the results on or about November 5, 2005. PacifiCorp expects that the update will change the timing of the next resource and can be reasonably expected to change the benchmark option used in the next RFP. However, much of the work already completed on RFP 2009 can be used in updating the RFP for these changes and the timing of the next resource is expected to require action on the draft RFP early next year, therefore, it would not be efficient to simply terminate this docket. Accordingly, PacifiCorp believes that parties and the IE will benefit from a suspension in the procedural schedule which will accommodate additional time to review any changes and updates.

5. For these reasons, PacifiCorp requests that the RFP review process be suspended. At this time, PacifiCorp is not proposing a complete new procedural schedule for Commission

consideration. Instead, PacifiCorp requests that the Commission establish a scheduling conference as soon as practicable after the November 5, 2005 release of the IRP Update.

Conclusion

WHEREFORE, PacifiCorp respectfully requests that the Commission enter an order suspending the scheduling order in the above-referenced proceeding as discussed herein.

Respectfully submitted this 19th day of October 2005.

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of October, 2005, I caused to be served, via electronic mail, a true and correct copy of the foregoing Motion to Extend Procedural Schedule to the following:

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