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Attorneys for PacifiCorp

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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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 EXTEND  
PROCEDURAL SCHEDULE

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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") amend the procedural schedule previously adopted in this proceeding to extend the time for party and Commission consideration and decision by approximately 30 days. 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. Up until this time, the parties have been proceeding substantially according to that procedural schedule. However, PacifiCorp received a substantial number of questions from the Independent Evaluator on the draft RFP 2009. While PacifiCorp spent more than a day with the Independent Evaluator verbally responding to these questions, PacifiCorp was unable to post responses to these questions until August 30, 2005. As a result, the Division, on behalf of the Independent Evaluator, sought some reasonable extension of time for the filing of the Independent Evaluator's comments which would otherwise be due on September 2, 2005. PacifiCorp agrees with the Division's request as this will provide the Independent Evaluator with the ability to provide more substantive comments.

4. As part of its routine IRP update process, PacifiCorp is currently undertaking a review and update of its resource assumptions. PacifiCorp expects to complete that update and file the results during October 2005. Initial indications from the update to PacifiCorp's forecasted resource gap are that load curtailment renewals and Qualifying Facilities contract assumptions will reduce or delay the need for 2009. An extension of the procedural schedule will provide PacifiCorp with an opportunity to ascertain what impact, if any, there will be to the amount and/or timing of the 2009 need and communicate with all parties. An extension of approximately 30 days is appropriate at this point so as not to jeopardize the ability to go forward with the RFP if necessary in a timely manner.

5. For these reasons, PacifiCorp requests that the RFP review process be delayed by approximately 30 days. PacifiCorp understands from discussions with the Division that the Independent Evaluator will file comments on September 16, 2005. Accordingly, PacifiCorp requests that the schedule be amended as follows:

<u>Event</u>	<u>Current Date</u>	<u>New Date</u>
Independent Evaluator Comments Due	September 2, 2005	September 16, 2005
PacifiCorp Reply Comments	September 9, 2005	October 11, 2005
Technical Conference This conference will be held from <b>9:00 a.m., Room 427, Heber M. Wells Building, 160 E. 300 S., Salt Lake City, Utah 84111.</b>	-----	October 21, 2005
Hearings (if necessary) These Hearings will be held at <b>9:00 a.m., Room 427, Heber M. Wells Building, 160 E. 300 S., Salt Lake City, Utah 84111.</b>	September 13-14, 2005	October 28, 31, 2005
Commission Order	September 30, 2005	November 7, 2005

### **Conclusion**

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

Respectfully submitted this 2<sup>nd</sup> day of September 2005.

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of September, 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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