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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION)
OF PACIFICORP FOR APPROVAL OF) Docket No. 99-035-10
ITS PROPOSED ELECTRIC RATE)
SCHEDULES AND ELECTRIC) MOTION OF LARGE CUSTOMER
SERVICE REGULATIONS) GROUP FOR ADDITIONAL
TIME)
) TO FILE DIRECT TESTIMONY OF
) MCCULLOUGH RESEARCH

The Large Customer Group (“LCG”) hereby moves the Commission for one additional week, through February 11, 2000, to file the prefiled direct testimony of McCullough Research. This Motion is supported by the Affidavit of Robert McCullough submitted herewith.

The LCG has hired McCullough Research to audit and prepare testimony relating to PacifiCorp’s sales-for resale activities, power supply models and related matters. The LCG sent PacifiCorp a data request for information needed by McCullough Research on December 20, 1999. PacifiCorp began responding to the LCG data request on January 13, 2000, but its response was incomplete. PacifiCorp has periodically provided additional information since that time. Some of the information provided by PacifiCorp was damaged and/or incomplete. Other information has still not been supplied. For example, the “FORWPRIC” data or model used as an input to the PD/Mac Model has still not been received, despite a specific request for all materials required to operate the PD/Mac model and reproduce PacifiCorp’s results.

The issues and analyses undertaken by McCullough Research are critically important to a proper evaluation of this case. Calendar year 1998 witnessed unprecedented levels of sales-for-resale activities and potential impacts on regulated rates are enormous. McCullough Research has made every reasonable effort to meet the February 4 testimony date, but it simply cannot complete its work and testimony by that time.

The delay in completing McCullough Research's analysis has been caused by a number of factors, including: (1) delays by PacifiCorp in providing information; (2) incomplete and inaccurate information; (3) damaged disks; (4) the obsolescence of the PD/Mac model and the obsolete hardware and software that runs it; (5) the failure or refusal of PacifiCorp, despite requests, to supply running instructions, a variable dictionary, a code hierarchy, or a write-up of the operations of its models; (6) proprietary claims as to the "Impact" Model, which provides critical inputs to the PD/Mac Model; and (7) a significant and unexplained delay in supplying "FORWPRIC" data used as inputs to the PD/Mac Model. These factors combined have made it impossible for McCullough Research to complete its analysis by the end of this week.

McCullough Research is analyzing whether PacifiCorp's models appropriately forecast power costs and sales for resale revenues for ratemaking purposes. The PD/Mac Model is written in an archaic computer dialect and will not run on currently available computers or with currently available computer tools or languages. McCullough Research is in the process of "translating" the model into a commonly-available language that can run on current computers. It is the LCG's understanding that no outside party has ever attempted to translate the PD/Mac model into a useable format that can be analyzed and easily tested for sensitivity and assumptions by others. It is a major effort that requires significant time. The efforts are well underway, at considerable expense, but the testimony cannot be completed until about February 11, 2000.

The LCG submits that a one-week delay in filing the testimony of McCullough Research will not unduly prejudice PacifiCorp. PacifiCorp will still have more than a month to prepare rebuttal testimony (significantly more time that McCullough Research has had to prepare its testimony since it began to receive even preliminary information from PacifiCorp in response to LCG data requests). On the other hand, the LCG will be severely prejudiced in its ability to

present its case if the one-week delay is not granted.

The LCG respectfully requests permission to file the testimony of McCullough Research on February 11, 2000.

DATED this _____ day of February, 2000.

PARR WADDOUPS BROWN GEE & LOVELESS

Gary A. Dodge

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, this ____ day of _____, 2000, to the following Edward Hunter

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