

does not need to be reconsidered on this issue.

II. NET POWER COST ADJUSTMENTS

PacifiCorp has also requested reconsideration of net power cost adjustments and in so doing has misstated the Committee's position, and, the Committee believes, the decision of the Commission. PacifiCorp's reconsideration petition states: "All of these statements fail to recognize that the Committee proposed and the Commission adopted the use of *normalized* prices for short-term firm purchases." Petition, p. 9 (emphasis in original). PacifiCorp has either misunderstood the Committee's position or is using a different definition of "normalized" than the Committee and Commission. The Committee position, as stated in the testimony of Mr. Falkenberg, was that the Commission should use actual prices for short-term firm purchases adjusted for losses. Mr. Falkenberg's testimony is straightforward:

As a result, I recommend that *actual volumes and prices* for transactions be used where reasonable. However, in many months, PacifiCorp made transactions in the Utah Division where purchase prices were higher than the comparable sales prices. I have eliminated these losses from the analysis. This is consistent with the assumptions made by the Company in its modeling of the normalized prices because in its normalization adjustment the Company assumed no losses occurred.

Direct Testimony of Randall J. Falkenberg for the Committee of Consumer Services (CCS-6) 24:11-16 (emphasis added). The Commission's order on this issue is consistent with the evidence presented and should not be reconsidered.

CONCLUSION

PacifiCorp has not presented sufficient reason for the Commission to reconsider its order with respect to the software write-down costs and the net power cost adjustments. The order should stand as it is on those issues.

Dated this 23rd day of June, 2000.

Douglas C. Tingey
Assistant Attorney General
Committee of Consumer Services

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing Response of the Committee of Consumer Services to Request for Reconsideration, in Docket No. 99-035-10, to be mailed, postage prepaid on this 23rd day of June, 2000, to the following:

Edward A. Hunter
John M. Eriksson
Stoel Rives, LLP
201 South Main Street, Suite 1100
Salt Lake City, Utah 84111

Doug Larsen
PacifiCorp
201 South Main Street, Suite 2300
Salt Lake City, Utah 84140

Matthew Wright
PacifiCorp
825 N. E. Multnomah, Suite 800
Portland, Oregon 97232

Dr. Charles Johnson
The Three Parties
1339 Foothill Boulevard, Suite 134
Salt Lake City, Utah 84108

Gary A. Dodge
Parr Waddoups Brown Gee & Loveless
185 South State Street, Suite 1300
Salt Lake City, Utah 84111-1536

Rick Anderson
Energy Strategies, Inc.
39 Market Street, Suite 200
Salt Lake City, Utah 84101

Peter J. Mattheis
Matthew J. Jones
Brickfield, Burchette & Ritts, P.C.
1025 Thomas Jefferson Street, N.W.
800 West Tower
Washington, D.C. 20007

Glen E. Davies
Parsons, Davies, Kinghorn & Peters, P.C.
185 South State Street. Suite 700
Salt Lake City, Utah 84111

Curtis Broadbent
Controller
Nucor Steel
P.O. Box 100
Plymouth, Utah 84330

Stephen R. Randle
Randle, Deamer, McConkie & Lee, P.C.
Attorneys for Utah Farm Bureau Federation
139 East South Temple, Suite 330
Salt Lake City, Utah 84111-1169

F. Robert Reeder
William J. Evans
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, Utah 84145-0898

Eric Blank
Land and Water Fund of the Rockies
2260 Baseline Road, Suite 200
Boulder, Colorado 80302

Lee R. Brown
Vice President, Contracts, Human Resources,
Public & Government Affairs
Magcorp
238 North 2200 West
Salt Lake City, Utah 84116

Jeff Burks, Director
Office of Energy and Resource Planning
Utah Department of Natural Resources
1594 West North Temple, Suite 300
Salt Lake City, Utah 84116

and hand delivered to:

Michael Ginsberg
Assistant Attorney General
Division of Public Utilities
160 East 300 South
Salt Lake City, Utah 84111

Division of Public Utilities
Heber M. Wells Building
160 East 300 South
Salt Lake City, Utah 84111
