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April 6, 2006

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VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

**Re: Request for Hearing on Application for Deferred Accounting
Docket UM 1240**

Enclosed for filing is PacifiCorp's Request for Hearing on Application for Deferred Accounting in the above-referenced matter. A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Katherine A. McDowell".

Katherine A. McDowell

KAM:knp

Enclosure

cc: Service List
Ed Busch
Judy Johnson
Paul Graham

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1240**

4 In the Matter of the Application of PACIFIC
5 POWER & LIGHT (d/b/a PacifiCorp) for a
6 Deferred Accounting Order

**PACIFICORP'S REQUEST FOR
HEARING ON APPLICATION FOR
DEFERRED ACCOUNTING**

7 PacifiCorp respectfully requests that the Commission assign an ALJ to this matter,
8 hold a prehearing conference and set a schedule, including a hearing, that allows for the full
9 development of the record on the Application. PacifiCorp submits this request under
10 ORS 757.259(2) and under the guidelines for deferred accounting set forth in Order 05-1070,
11 which allow the Commission "flexibility to adapt [its] procedures as necessary on a case-by-
12 case basis." *In re Investigation Related to Deferred Accounting*, UM 1147, Order 05-1070
13 at 9 (Oct 2005).

14 PacifiCorp filed this Application on January 6, 2006, seeking deferred accounting for
15 the income tax effect of differences in test year versus actual net revenue. The Application
16 was scheduled for the Commission's public meeting agenda on March 23, 2006. In advance
17 of the meeting, Staff issued a memorandum recommending denial of PacifiCorp's
18 Application.

19 The issues raised by the Application and by Staff's memorandum are complex. The
20 general issue addressed by the Application is whether the Commission may use deferred
21 accounting as a regulatory tool to mitigate unintended, negative consequences of SB 408,
22 particularly the so-called "double whammy." While this question is generic in nature, the
23 scope and impact of the negative consequences is dependent on the unique factual
24 circumstances of the utility.

25 PacifiCorp submits that a full contested case process is required to develop the record
26 the Commission needs for decision in this case. Additionally, the existence of such a record

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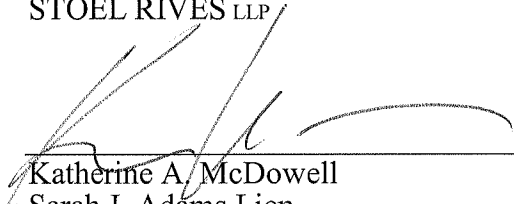
1 may be useful in facilitating the implementation of SB 408 through rulemaking or legislative
2 amendments to SB 408.

3 PacifiCorp understands that the Commission intends to conduct contested case
4 proceedings in related deferred accounting applications filed by PGE and NW Natural,
5 Dockets UM 1238 and UM 1244, respectively. The Commission should handle all of these
6 cases in a uniform manner procedurally.

7 For the reasons stated, PacifiCorp respectfully requests commencement of full
8 contested case proceedings on this Application.

9 DATED: April 6, 2006.

10 STOEL RIVES LLP

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12 _____
13 Katherine A. McDowell
14 Sarah J. Adams Lien

15 Attorneys for PacifiCorp
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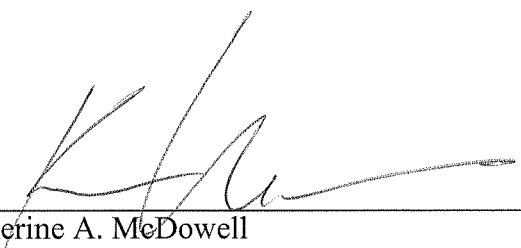
CERTIFICATE OF SERVICE

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I hereby certify that I served the foregoing document on the following named person(s) on the date indicated below by email and first-class mail to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at his or her last-known address(es) indicated below.

Jason Eisdorfer
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205
dockets@oregoncub.org

DATED: April 6, 2006.



Katherine A. McDowell
Of Attorneys for PacifiCorp