



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

May 24, 2007

***VIA ELECTRONIC FILING
AND OVERNIGHT MAIL***


Oregon Public Utility Commission
550 Capitol Street NE, Suite 215
Salem, OR 97310-2551

Attn: Vikie Bailey-Goggins, Administrator
Regulatory and Technical Support

RE: Docket No. UI-_____
Petition for Waiver of the Filing Requirements for Quarterly Fuel Mix Inserts

PacifiCorp (d.b.a. Pacific Power & Light Company) hereby submits for filing an original and five copies of the Company's Petition for Waiver of the Filing Requirements for its Quarterly Fuel Mix Inserts.

Very truly yours,


Andrea L. Kelly
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UI _____

In the Matter of Petition for)	
Approval of a Waiver of the Filing)	
Requirements for its Quarterly Fuel)	PacifiCorp's Petition for Waiver of
Mix Reports)	Compliance with OAR 860-038-
)	0300 and Waiver of Paper Service
)	

Pursuant to OAR 860-038-0001(4), PacifiCorp, d/b/a Pacific Power & Light ("PacifiCorp"), respectfully requests that the Oregon Public Utility Commission ("Commission") grant a waiver of compliance with the requirements set forth in OAR 860-038-0300(2) & (3) for PacifiCorp's second quarter 2007 fuel mix billing insert. OAR 860-038-0001(4) provides that the Commission may relieve PacifiCorp of the requirements of the Division 038 rules for good cause shown. As demonstrated below, good cause exists to grant a waiver of the requirements set forth in OAR 860-038-0300(2) & (3) for PacifiCorp's second quarter 2007 fuel mix bill inserts. Additionally, PacifiCorp waives paper service in this docket.

In support of this Petition, PacifiCorp states:

A. PacifiCorp

PacifiCorp is a public utility in the state of Oregon and is subject to the jurisdiction of the Commission with regard to rates, service, and accounting practices. PacifiCorp also provides retail electricity service in the states of California, Idaho, Utah, Washington, and Wyoming.

B. Communications

Communications regarding this Application should be addressed to:

PacifiCorp Oregon Dockets
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (503) 813-5542
Facsimile: (503) 813-6060
E-mail: oregondockets@pacificorp.com

and

Michelle Mishoe
Legal Counsel
825 NE Multnomah, Suite 1800
Portland, OR 97232
Telephone: (503) 813-5977
Facsimile: (503) 813-7252
E-mail: michelle.mishoe@pacificorp.com

In addition, the Company respectfully requests that all formal correspondence and data requests regarding this matter be addressed to:

By E-mail (**preferred**): datarequest@pacificorp.com
By facsimile: (503) 813-6060
By regular mail: Data Request Response Center
 PacifiCorp
 825 NE Multnomah, Suite 2000
 Portland, OR 97232

Informal inquiries may be directed to Joelle Steward, Regulatory Manager at 508-813-5542.

C. Basis for Petition

1. PacifiCorp's Bill Inserts

In accordance with OAR 860-038-0300(2) & (3), PacifiCorp includes quarterly inserts in billing statements detailing the price, power source and environmental information for each service and product offered ("fuel mix insert"), in a format prescribed by the Commission. OAR 860-038-0300(4) specifies that the company must report power source and environmental information based on the company's own generating resources. It further specifies that the company's "own resources do not include the non-energy attributes associated with purchases under the provisions of a net metering tariff or other power production tariff unless the electric company has separately contracted for the purchase of the Tradable Renewable Certificates." Additionally, in preparing the environmental information, PacifiCorp relies on regional emissions data from the Oregon Department of Energy ("ODOE") to provide a comparison of the company's own generation emissions with that of the Northwest average. PacifiCorp typically issues these inserts in the March, June, August and October billing statements. The prior year's generation data is usually reflected in the inserts beginning in June.

2. Approval of Waiver would Benefit Customers

During PacifiCorp's preparation of the second quarter fuel mix bill insert, which was scheduled for inclusion in billing statements in June, PacifiCorp became aware that it would require additional time to ensure that it was properly reflecting the removal of non-energy attributes of its owned renewable generation as a result of green tag sales. After consulting with Commission Staff, PacifiCorp has postponed production of the June fuel mix bill insert in order to ensure that information regarding green tag sales is properly reconciled with renewable generation data. It takes approximately six weeks to prepare

billing inserts and it is already mid-May, therefore PacifiCorp will be unable to complete the reconciliation in time to be included in the June fuel mix insert.

Further, PacifiCorp relies on regional emissions data from the ODOE in developing the environmental impact reports to residential customers. Indeed, the regional emission data sets the benchmark for PacifiCorp's environmental impact reporting. PacifiCorp has been advised by ODOE that this data will not be available until May 31, 2007. Therefore, PacifiCorp will be unable to incorporate this necessary data in the June fuel mix insert.

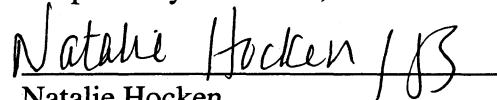
OAR 860-038-0001(4) provides that, for good cause shown, the Commission may relieve PacifiCorp of its Division 038 duties. Unless waived, PacifiCorp will only be able to present incomplete and potentially inaccurate information and would be forced to explain any discrepancies in the next quarterly fuel mix insert, which is scheduled to issue in August 2007. The public interest would be best served by waiting to present complete and accurate information about renewable generation sales in the August 2007 fuel mix insert. Given the timing impediments described above, PacifiCorp does not have sufficient time to prepare an accurate report to be included in the June billing statements. PacifiCorp believes that the public interest would be best served by waiting to present this information, completely and accurately, in the August 2007 fuel mix insert.

Given the need for additional time to reconcile green tag sales with renewable generation and the need for accurate regional emissions data, the public interest would be best served by the Commission granting the requested waiver.

WHEREFORE, PacifiCorp respectfully requests that the Commission grant PacifiCorp a waiver from compliance with the requirements of OAR 860-038-0300(2) & (3) for the 2007 second quarterly fuel mix report.

DATED this 24th day of May, 2007.

Respectfully submitted,

A handwritten signature in cursive script that reads "Natalie Hocken" followed by a stylized flourish or initials.

Natalie Hocken
Vice President & General Counsel
PacifiCorp