



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

October 30, 2013

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Public Utility Commission of Oregon
550 Capitol Street NE, Suite 215
Salem, OR 97301-2551

Attn: Filing Center

**Re: UM 1631—PacifiCorp's Petition for a Limited Waiver of OAR 860-027-0005,
860-027-0015, 860-027-0045(3), and 860-027-0070(1)**

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits for filing its Petition for a Limited Waiver of OAR 860-027-0005, 860-027-0015, 860-027-0045(3), and 860-027-0070(1).

PacifiCorp respectfully requests that all data requests in this docket be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232

Informal questions concerning this filing may be directed to Bryce Dalley, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6389.

Sincerely,

William R. Griffith /AS
William R. Griffith
Vice President, Regulation

Enclosures

cc: Service List – UM 1631

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document, in Docket UM 1631, on the date indicated below by email and/or US Mail, addressed to said parties at his or her last-known address(es) indicated below.

Docket UM 1631

Regulatory Dockets (W)
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
dockets@idahopower.com

Lisa D. Nordstrom (W)
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
lnordstrom@idahopower.com

Courtney Waites (W)
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
cwaites@idahopower.com

E-Filing (W)
Northwest Natural
220 NW 2nd Avenue
Portland, OR 97209
Efiling@nwnatural.com

Onita King (W)
Northwest Natural
220 NW 2nd Avenue
Portland, OR 97209
ork@nwnatural.com

Dated this 30th of October, 2013.

/s/ Ariel Son _____
Ariel Son
Regulatory Projects Manager

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1631**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Petition for a Limited Waiver of Certain
Filing Deadlines in OAR Chapter 860,
Division 027.

**PETITION FOR A LIMITED WAIVER
OF CERTAIN FILING DEADLINES IN
OAR CHAPTER 860, DIVISION 027**

PacifiCorp d/b/a Pacific Power (Company) files this petition with the Public Utility Commission of Oregon (Commission) under OAR 860-027-0000(2), which allows the Commission to waive application of a Division 027 rule “for good cause shown.” The Company respectfully requests the Commission waive the filing deadlines in OAR sections 860-027-0005, 860-027-0015, 860-027-0045(3), and 860-027-0070(1) and allow the Company to file the required reports on the alternative dates identified below.

Under OAR 860-027-0005, an energy utility must file its proposed budget of expenditures annually by the first day of November. In past years, Commission Staff informally extended the deadline for the Budget of Expenditures Report. On October 2, 2013, the Company sent a letter to Staff requesting an extension of the November 1, 2013 filing date. On October 15, 2013, Staff informally accepted the Company’s alternative date of March 31, 2014. But on October 17, 2013, Staff requested that the Company make a formal filing in docket UM 1631 to a request waiver of the filing deadline. Staff also advised that the Company should include requests for waivers of the filing deadlines for other reports that, like the waiver of the deadline for filing the Budget of Expenditures Report, had previously been granted informally.

The Company is submitting this petition in response to Staff's request and respectfully requests waiver of the following rules:

(1) OAR 860-027-0005, which requires a utility to file its Budget of Expenditures Report by November 1 of each year, and OAR 860-027-0015, which requires a utility to file a New Construction Budget Report by December 31 of each year.

- The Company requests an alternative filing deadline of March 31, 2014, for both reports.
- The extension of the filing deadlines for the Budget of Expenditures and New Construction Budget reports is necessary because the Company operates on a calendar fiscal year and budgets are not approved until mid-December. The approved budgets are then incorporated into the accounting system during the first quarter, which allows the budget data to be categorized using the Federal Energy Regulatory Commission (FERC) Uniform System of Accounts, as well as categorized by capital project. To complete the Budget of Expenditures and New Construction Budget reports, the Company needs the categorized budget data from the accounting system.

(2) OAR 860-027-0045(3), which requires a multi-state electric utility to file its Oregon Results of Operations Report for the previous calendar year annually by April 1.

- The Company requests an alternative filing deadline of April 30, 2014.
- This extension is necessary because the Company needs approximately 120 days after the end of the calendar year to appropriately and accurately reflect state-allocated data using the approved inter-jurisdictional allocation factors. The Company has historically been granted an informal extension to allow sufficient time for this process.


(3) OAR 860-027-0070(1), which requires electric, gas, water, and steam heat utilities to file their Annual Reports (also referred to as the Oregon FERC Form 1 Supplement) by April 1 of each year.

- The Company requests an alternative filing deadline of May 31, 2014.
- This extension is needed to allow sufficient time to process the data necessary to produce the reports in each of its state jurisdictions. In accordance with a

January 4, 2010 letter from Staff, the Company has regularly requested and received extensions informally to allow sufficient time for this process.¹

For the reasons stated above, the Company respectfully requests that the Commission waive the filing deadlines in OAR 860-027-0005, 860-027-0015, 860-027-0045(3), and 860-027-0070(1) and allow the Company to file the required reports by requested alternative deadlines.

Respectfully submitted this 30th day of October, 2013.

Handwritten signature of Sarah K. Wallace in cursive script.

Sarah K. Wallace
Sarah K. Wallace
Senior Counsel
PacifiCorp d/b/a Pacific Power

¹ The Company has historically provided courtesy copies of its FERC Form 1 report to Staff on an informal basis. Beginning with the 2012 report, the Company began filing the FERC Form 1 report electronically under RE 68. The Company will continue providing the FERC Form 1 reports under RE 68 in May of each year.