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Portland, Oregon 97232

May 29, 2015

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
3930 Fairview Industrial Dr. S.E.  
Salem, OR 97302-1166

Attn: Filing Center

**RE: Docket UM 1712—Motion for Clarification**

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Motion for Clarification.

If you have any questions, please contact me at (503) 813-6389 or [bryce.dalley@pacificorp.com](mailto:bryce.dalley@pacificorp.com).

Sincerely,

R. Bryce Dalley  
Vice President, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1712**

In the Matter of  
PACIFICORP d/b/a PACIFIC POWER  
Application for Approval of Deer Creek Mine  
Transaction.

**PACIFICORP’S MOTION FOR  
CLARIFICATION  
*EXPEDITED CONSIDERATION  
REQUESTED***

In accordance with OAR 860-001-0420, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) moves for clarification of Order No. 15-161, issued in this proceeding on May 27, 2015. In ordering paragraph 2, the Public Utility Commission of Oregon authorized PacifiCorp to “defer costs associated with the Deer Creek Mine’s closure for consideration in the company’s next general rate case.” The ordering paragraph does not include the date that PacifiCorp is authorized to begin deferring the closure costs.<sup>1</sup> On pages 6-7 of the order, however, the Commission authorizes PacifiCorp to “establish a deferred account to track the closure costs beginning on June 1, 2015,” which could be read as authorizing deferral only for costs incurred after June 1, 2015, resulting in immediate disallowance of significant closure costs.

Given this possible inconsistency, PacifiCorp respectfully requests that the Commission clarify that the Company is authorized to defer closure costs incurred beginning December 12, 2014, which is the date the Company filed its application in this proceeding. This reading of the order is consistent with ORS 757.259(4) and the remainder of the order,

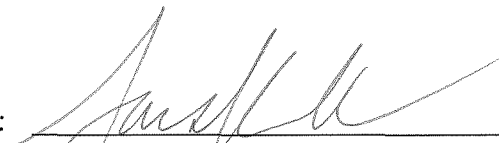
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<sup>1</sup> Like the ordering paragraph, the summary paragraph on page 1 of Order 15-161 does not include the date that PacifiCorp is authorized to begin deferring closure costs.

which does not indicate that the Commission intended to limit the deferral to closure costs incurred after June 1, 2015.

The Company respectfully requests expedited consideration of this motion to facilitate the closing of the transaction. The Company discussed this motion with representatives from the Citizens' Utility Board of Oregon, Commission Staff, and the Industrial Customers of Northwest Utilities. CUB does not object to this motion, Staff did not take a position, and ICNU indicated that it does not agree with the Company's reading of the order. Given ICNU's disagreement and the need for an expedited resolution, the Company spoke with Chief Administrative Law Judge Michael Grant, who stated that he will convene a prehearing conference on Monday, June 1, 2015, to discuss this motion.

Respectfully submitted this 29<sup>th</sup> day of May, 2015.

By:   
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Sarah K. Wallace  
Vice President and General Counsel  
PacifiCorp d/b/a/ Pacific Power