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April 17, 2015

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
3930 Fairview Industrial Drive SE
Salem, Oregon 97302-1166

Attn: Filing Center

RE: DR 49 – Pacific Power’s Response to Petition for Declaratory Ruling

PacifiCorp d/b/a Pacific Power submits this preliminary response to the April 10, 2015 Petition for Declaratory Ruling filed by Georgia-Pacific LLC and Clatskanie People’s Utility District.

If you have questions about this filing, please contact Natasha Siores, Directory Regulatory Affairs and Revenue Requirement at (503) 813-6583.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosure

cc: Service List – DR 49

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DR 49

In the Matter of

GEORGIA-PACIFIC CONSUMER PRODUCTS
(CAMAS) LLC and CLATSKANIE PEOPLE'S
UTILITY DISTRICT

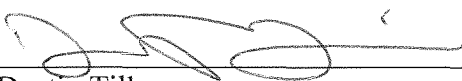
PACIFIC POWER'S RESPONSE
TO PETITION FOR
DECLARATORY RULING

Petition for Declaratory Ruling.

1 Under OAR 860-001-0400 and OAR 860-001-0430, PacifiCorp d/b/a Pacific Power
2 (Pacific Power or the Company) submits this preliminary response to the April 10, 2015
3 Petition for Declaratory Ruling (Petition) filed by Georgia-Pacific (Camas) LLC (GP Camas)
4 and Clatskanie People's Utility District (CPUD). In the Petition, GP Camas and CPUD
5 (collectively the Joint Petitioners) request that the Public Utility Commission of Oregon
6 (Commission) determine whether the: (1) CPUD is subject to Oregon's direct access laws,
7 specifically ORS 757.672(2), and therefore may provide service to GP Camas without
8 becoming a certified Electric Service Supplier (ESS); and (2) CPUD's proposed service to
9 GP Camas violates Oregon's exclusive service territory laws, contained in ORS 758.450(2).

10 Because the Joint Petitioners present important legal and policy questions, Pacific
11 Power respectfully requests the Commission substantively consider the petition and set a
12 schedule for briefing and oral arguments. Pacific Power further supports the Joint
13 Petitioners' request for expedited consideration of the petition. To allow for expedited
14 consideration, Pacific Power requests briefing begin in early June 2015.

Respectfully submitted this 17th day of April, 2015.

By: 
Dustin Till
Senior Counsel