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April 14, 2005

BY ELECTRONIC AND REGULAR MAIL

Hon. Traci Kirkpatrick Administrative Law Judge Oregon Public Utility Commission Suite 215 550 Capitol Street NE Salem, OR 97301-2551

> Re: Wah Chang v. PacifiCorp; Docket Number UM 1002

Dear Judge Kirkpatrick:

After reviewing the Status Conference Memorandum issued in this matter on April 13, 2005, Rich Williams and I have had further discussions concerning the parties' respective opportunities to conduct discovery between now and the hearing.

Mr. Williams and I have agreed that both parties should be allowed to conduct discovery at any time between now and the date of the hearing. The default time for responding to data requests issued between February 18, 2006, and March 31, 2006, however, should be shortened to seven Commission business days, and the default time for responding to data requests issued between April 1, 2006, and April 24, 2006, should be shortened to five Commission business days.

We have also agreed that all data requests will be served electronically in either Word Perfect or Microsoft Word format, and that all responses to data requests will be served by hand delivery or by electronic mail on or before the date that they are due.

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Assuming that these changes meet your approval, PacifiCorp and Wah Chang jointly request that the Status Conference Memorandum be amended or otherwise modified to reflect the parties' agreement concerning discovery.

Thank you again for your attention to this matter.

Sincerely,

JAZ:mlb

c: Rich Williams

Lawrence Reichman

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