

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com
Suite 400
333 S.W. Taylor
Portland, OR 97204

June 13, 2005

Via Electronic and U.S. Mail

Honorable Kathryn A. Logan
Administrative Law Judge
Oregon Public Utility Commission
550 Capitol Street, N.E.
Salem, OR 97310

Re: In the Matter of PACIFIC POWER & LIGHT Request for a General Rate
Increase in the Company's Oregon Annual Revenues
Docket No. UE 170

Dear Judge Logan:

In accordance with your June 9, 2005 Memorandum, the Klamath Off-Project Water Users, Inc. ("KOPWU") submits this letter regarding procedural issues in Oregon Public Utility Commission ("OPUC" or the "Commission") Docket No. UE 170. With respect to the questions regarding oral argument, KOPWU requests that the Commission hold oral argument in UE 170. Counsel for KOPWU is *unavailable* to participate on August 1, 11, 15, and 17, 2005.

KOPWU's primary interest in UE 170 relates to PacifiCorp's proposal to move KOPWU's members to standard irrigation tariffs in 2006. A prehearing conference has been scheduled for June 24, 2005, to identify issues and establish a procedural schedule to address the appropriate rates for Klamath irrigation customers. At that prehearing conference, KOPWU intends to request that the Commission address the issues regarding the appropriate rates for Klamath irrigation customers independently of the other general rate case issues. Specifically, KOPWU believes that the Commission should schedule a separate hearing and oral argument regarding the Klamath irrigation rates.

Given that the issues regarding the Klamath irrigation rates have only recently been shifted back into UE 170, KOPWU believes that it is appropriate to provide more time to address those issues than is provided by the current procedural schedule in UE 170. If the Commission establishes a separate procedural schedule that provides adequate time to address the specific issues regarding the Klamath irrigation rates, it may be unnecessary for KOPWU to participate in the oral argument related to other issues in UE 170.

Honorable Kathryn Logan

June 13, 2005

Page 2

With respect to the question of consolidating the power cost adjustment mechanism filing in UE 173 with the general rate case in UE 170, KOPWU has no position regarding that issue.

KOPWU appreciates the opportunity to comment.

Sincerely,

/s/ Matthew Perkins

Matthew Perkins

cc: Service list

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com
Suite 400
333 S.W. Taylor
Portland, OR 97204

June 13, 2005

Via Electronic and US Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of PACIFIC POWER & LIGHT Request for a
General Rate Increase in the Company's Oregon Annual Revenues
Docket No. UE 170

Dear Filing Center:

Enclosed please find an original and two (2) copies of the Letter to Administrative Law Judge Logan on behalf of the Klamath Off-Project Water Users' in the above-captioned Docket.

Please file-stamp a copy and return it in the self-addressed, stamped envelope provided. Thank you for your assistance.

Sincerely yours,

/s/ Sheila R. Ho
Sheila R. Ho

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Letter to Administrative Law Judge Logan on behalf of the Klamath Off-Project Water Users, upon the parties on the service list in UE 170, by causing the same to be mailed, postage-prepaid, through the U.S. Mail.

Dated at Portland, Oregon, this 13th day of June, 2005.

/s/ Sheila R. Ho
Sheila R. Ho

RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC RATES & REGULATORY AFFAIRS 121 SW SALMON STREET, 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com	JIM ABRAHAMSON COMMUNITY ACTION DIRECTORS OF OREGON 4035 12TH ST CUTOFF SE STE 110 SALEM OR 97302 jim@cado-oregon.org
EDWARD BARTELL KLAMATH OFF-PROJECT WATER USERS INC 30474 SPRAGUE RIVER ROAD SPRAGUE RIVER OR 97639	KURT J BOEHM BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bklawfirm.com
LISA BROWN WATERWATCH OF OREGON 213 SW ASH ST STE 208 PORTLAND OR 97204 lisa@waterwatch.org	LOWREY R BROWN CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY, SUITE 308 PORTLAND OR 97205 lowrey@oregoncub.org
PHIL CARVER OREGON DEPARTMENT OF ENERGY 625 MARION ST NE STE 1 SALEM OR 97301-3742 philip.h.carver@state.or.us	JOHN CORBETT YUOK TRIBE PO BOX 1027 KLAMATH CA 95548 jcorbett@yuroktribe.nsn.us
JOAN COTE OREGON ENERGY COORDINATORS ASSOCIATION 2585 STATE ST NE SALEM OR 97301 cotej@mwvcaa.org	JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org
JOHN DEVOE WATERWATCH OF OREGON 213 SW ASH STREET, SUITE 208 PORTLAND OR 97204 john@waterwatch.org	EDWARD A FINKLEA CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP 1001 SW 5TH, SUITE 2000 PORTLAND OR 97204 efinklea@chbh.com

<p>DAVID HATTON DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 david.hatton@state.or.us</p>	<p>JUDY JOHNSON PUBLIC UTILITY COMMISSION PO BOX 2148 SALEM OR 97308-2148 judy.johnson@state.or.us</p>
<p>JASON W JONES DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 jason.w.jones@state.or.us</p>	<p>DAN KEPPE KLAMATH WATER USERS ASSOCIATION 2455 PATTERSON STREET, SUITE 3 KLAMATH FALLS OR 97603</p>
<p>MICHAEL L KURTZ BOEHM, KURTZ & LOWRY 36 E 7TH ST STE 1510 CINCINNATI OH 45202-4454 mkurtz@bklawfirm.com</p>	<p>JIM MCCARTHY OREGON NATURAL RESOURCES COUNCIL PO BOX 151 ASHLAND OR 97520 jm@onrc.org</p>
<p>KATHERINE A MCDOWELL STOEL RIVES LLP 900 SW FIFTH AVE STE 1600 PORTLAND OR 97204-1268 kamcdowell@stoel.com</p>	<p>BILL MCNAMEE PUBLIC UTILITY COMMISSION PO BOX 2148 SALEM OR 97308-2148 bill.mcnamee@state.or.us</p>
<p>DANIEL W MEEK DANIEL W MEEK ATTORNEY AT LAW 10949 SW 4TH AVE PORTLAND OR 97219 dan@meek.net</p>	<p>NANCY NEWELL 3917 NE SKIDMORE PORTLAND OR 97211 ogec2@hotmail.com</p>
<p>MICHAEL W ORCUTT HOOPA VALLEY TRIBE FISHERIES DEPT PO BOX 417 HOOPA CA 95546</p>	<p>STEPHEN R PALMER OFFICE OF THE REGIONAL SOLICITOR 2800 COTTAGE WAY, RM E-1712 SACRAMENTO CA 95825</p>
<p>STEVE PEDERY OREGON NATURAL RESOURCES COUNCIL sp@onrc.org</p>	<p>MATTHEW W PERKINS DAVISON VAN CLEVE PC 333 SW TAYLOR, STE 400 PORTLAND OR 97204 mwp@dvclaw.com</p>
<p>JANET L PREWITT DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 janet.prewitt@doj.state.or.us</p>	<p>THOMAS P SCHLOSSER MORISSET, SCHLOSSER, JOZWIAK & MCGAW t.schlosser@msaj.com</p>
<p>GLEN H SPAIN PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOC PO BOX 11170 EUGENE OR 97440-3370 fish1ifr@aol.com</p>	<p>DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC 121 SW SALMON 1WTC13 PORTLAND OR 97204 doug.tingey@pgn.com</p>

ROBERT VALDEZ
PO BOX 2148
SALEM OR 97308-2148
bob.valdez@state.or.us

PAUL M WRIGLEY
PACIFIC POWER & LIGHT
825 NE MULTNOMAH STE 800
PORTLAND OR 97232
paul.wrigley@pacificorp.com