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June 13, 2005

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VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
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**Re: PacifiCorp's Comments in Response to ALJ Memorandum
Docket UE 170**

Enclosed for filing is PacifiCorp's Comments in Response to ALJ Memorandum in the above-referenced docket. A copy of this filing was served on all parties to this proceeding as indicated on the attached service list.

Very truly yours,

A handwritten signature in black ink, appearing to be "KAM", written over the words "Very truly yours,".

Katherine A. McDowell

KAM:knp
Enclosures
cc: Service List

Oregon
Washington
California
Utah
Idaho

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 170

In the Matter of PACIFIC POWER &
LIGHT (d/b/a PacifiCorp) Request for a
General Rate Increase in the Company's
Oregon Annual Revenues

PACIFICORP'S COMMENTS IN
RESPONSE TO ALJ MEMORANDUM

On June 9, 2005 the ALJ issued a Memorandum asking parties to comment on whether the Commission should convene oral argument in this case and on scheduling availability for an oral argument.

PacifiCorp believes that oral argument is appropriate in this case. While PacifiCorp is generally available on any of the dates provided in the Memorandum, it believes that the later dates are preferable to the earlier dates to provide parties a better opportunity to file helpful post-trial briefs prior to the argument.

Secondly, the Memorandum solicited comment on whether the power cost adjustment mechanism ("PCAM") in docket UE 173 should be consolidated with this rate case docket. PacifiCorp appreciates the suggestion and is mindful of the concerns it raises about judicial efficiency and resource allocation.

While UE 170 and UE 173 are clearly connected, PacifiCorp does not support consolidation of these dockets because it would require an extension of the schedule in UE 170, something to which PacifiCorp is opposed, or an acceleration of the schedule in UE 173, something that would likely be difficult and burdensome to the parties.

DATED: June 13, 2005.

STOEL RIVES LLP

Katherine A. McDowell

Attorneys for PacifiCorp

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UE 170 on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

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DATED: June 13, 2005


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