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September 16, 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 the original and six copies of the Joint Request For Oral Argument of Klamath Off-Project Water Users and the Klamath Water Users Association in Docket No. UE 170.

Please return one file-stamped copy of this document in the enclosed stamped envelope.

Thank you for your assistance.

Sincerely,

/s/ Sheila R. Ho
Sheila R. Ho

Enclosures

cc: Service List (via email)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Joint Request For Oral Argument of the Klamath Off-Project Water Users and the Klamath Water Users Association upon the parties on the service list via email.

Dated at Portland, Oregon, this 16th day of September, 2005.

/s/ Sheila R. Ho
Sheila R. Ho

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 170

In the Matter of)	
)	
PACIFIC POWER & LIGHT)	KLAMATH OFF-PROJECT WATER
(dba PACIFICORP))	USERS AND KLAMATH WATER
)	USERS ASSOCIATION’S REQUEST
)	FOR ORAL ARGUMENT
Request for a General Rate Increase in the)	
Company's Oregon Annual Revenues.)	
_____)	

The Klamath Off-Project Water Users, Inc. (“KOPWU”) and Klamath Water Users Association (“KWUA”) respectfully request that the Oregon Public Utility Commission (“OPUC” or the “Commission”) hold Oral Argument regarding the statutory standard applicable to setting electric rates for irrigators in the Klamath Basin in Docket UE 170. Although the procedural schedule adopted by the ALJ in UE 170 on June 30, 2005, does not include a date for oral argument, KOPWU and KWUA are requesting oral argument after reviewing the arguments put forth by the parties in Opening Briefs.

ORS § 756.518(2) provides that upon the request of any party in a “major proceeding,” the Commission is required to provide the parties an opportunity for oral argument before it issues a final order. A “major proceeding” is defined in OAR § 860-014-0023 as “a proceeding that has, or is expected to have, a full procedural schedule with written testimony or written comments” and has either a substantial impact on utility rates or service for energy utilities with over 50,000 customers or a significant impact on the customers or operations of an energy utility with more than 50,000 customers.

Docket UE 170 will have a substantial impact on utility rates or service. In UE 170, PacifiCorp has requested a revenue requirement increase of approximately \$57 million, and has proposed to increase Klamath irrigators' rates over 1200%. Such increases will have a substantial impact on PacifiCorp's customers in general and Klamath irrigation customers in particular. Finally, PacifiCorp has more than 50,000 customers in Oregon. Under these circumstances, UE 170 satisfies the requirements of OAR § 860-014-0023 and is considered a major proceeding under ORS § 756.518(2), and oral argument is appropriate.

WHEREFORE, KOPWU and KWUA request that the Commission schedule oral argument in UE 170.

Dated this 16th day of September, 2005.

Respectfully submitted,

/s/ Matthew Perkins

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