

March 12, 2009

VIA ELECTRONIC FILING AND U.S. MAIL

Sarah K. Wallace
Administrative Law Judge
Public Utility Commission of Oregon
PO Box 2148
Salem, Oregon 97308-2148

Re: Docket No. UM 1401:
– **Request for Status Conference regarding Discovery**
– **Request for Extension of Time to respond to ICNU's Data Request**

Dear Judge Wallace:

On March 10, 2009, PacifiCorp, Portland General Electric Company, and Idaho Power Company received data requests in UM 1401 from the Industrial Customers of Northwest Utilities ("ICNU"). The data requests seek extensive information regarding the existence, cost, and rate treatment of each utility's distribution, network and system upgrades, both existing and planned. The utilities' responses are due on March 24, 2009. Providing a response to the data requests will be burdensome and time consuming.

I have spoken with the attorneys representing Idaho Power and Portland General Electric. All three utilities were surprised to receive data requests at this point in the schedule established for UM 1401. All three utilities believe it would be useful if you would convene a status conference to consider the appropriateness, scope and timing of discovery in this docket. Please consider this letter PacifiCorp's request for such a status conference. Please also consider this letter PacifiCorp's request for an extension of time for any response to ICNU's data requests until at least ten Commission business days after the requested status conference or your decision not to convene such a conference. Portland General Electric and Idaho Power have both indicated that they support these requests.

I have spoken to ICNU's attorney. ICNU does not object to PacifiCorp's requested extension of time provided ICNU receives a matching extension of time to meet its April 10 deadline for submitting comments in this docket. ICNU has indicated a willingness to discuss any concerns

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the utilities have with the data requests. PacifiCorp appreciates ICNU's willingness to discuss its data request, but believes it would be useful to convene a status conference to discuss the role of discovery in this proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Lovinger", is written over a horizontal line that extends to the right.

Jeffrey S. Lovinger
Attorney for PacifiCorp

cc: Jordan White, PacifiCorp
UM 1401 Service List

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of March, 2009, I caused to be served, via E-Mail and US Mail (to those parties who have not waived paper service), a true and correct copy of the foregoing document on the following named person(s) at his or her last-known address(es) indicated below.

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