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October 27, 2005

**ELECTRONIC FILING**

PUC Filing Center  
Oregon Public Utility Commission  
PO Box 2148  
Salem, OR 97301-2148

**Re: Docket No. UM 1208**

Enclosed for filing is one copy of PacifiCorp's Motion to Suspend RFP 2009 Review in this matter. A hard copy was served on all parties of record as indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeanette Schuster", written in a cursive style.

Jeanette C. Schuster

JCS:jlf  
Enclosure  
cc: Service List

Oregon  
Washington  
California  
Utah  
Idaho

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 1208**

4 In the Matter of PACIFICORP Draft 2009  
5 Request for Proposals

**PACIFICORP'S**  
**MOTION TO SUSPEND RFP 2009**  
**REVIEW**

6  
7 Pursuant to OAR 860-013-0031, PacifiCorp (or the "Company") hereby requests that  
8 the Oregon Public Utility Commission (the "Commission") temporarily suspend the  
9 RFP 2009 review process to extend the time for party and Commission consideration and  
10 decision. In support of this application, PacifiCorp states as follows:

11 1. On June 28, 2005, consistent with the guidelines established by the  
12 Commission for conducting competitive bidding solicitations in Order 91-1383, PacifiCorp  
13 filed a request for approval of its 2009 Request for Proposals for a Flexible Resource  
14 ("RFP 2009"). PacifiCorp requested that the Commission issue an order approving RFP  
15 2009 no later than 90 days after the filing date, or by September 26, 2005.

16 2. By letter dated September 2, 2005, PacifiCorp requested the Commission to  
17 defer Commission consideration of and issuance of an order on PacifiCorp's RFP 2009 by  
18 approximately 30 days in order to provide PacifiCorp with an opportunity to ascertain what  
19 impact, if any, there will be to the amount and/or timing of the 2009 need based on the  
20 Company's currently ongoing IRP Action Plan update. In its letter, PacifiCorp explained  
21 that, while no formal schedule has been adopted by the Commission in this proceeding,  
22 Order No. 91-1383 contemplates that the review process for draft RFPs will be  
23 approximately 60 days with a Commission public meeting for Commission Staff and party  
24 comment. PacifiCorp requested that the Commission consideration of the draft RFP 2009 be  
25 conducted at the October 25, 2005 Commission public hearing. Administrative Law Judge

26

1 Michael Grant issued a ruling on September 27, 2005 in which he explained that he treated  
2 PacifiCorp's letter as a motion to amend the schedule and granted PacifiCorp's request.

3         3.         As indicated in PacifiCorp's September 2, 2005 letter to the Commission, as  
4 part of its routine IRP update process, PacifiCorp is currently undertaking a review and  
5 update of its resource assumptions. On October 5, 2005, PacifiCorp held an IRP input  
6 meeting to notify parties that the update process indicated to PacifiCorp's forecasted resource  
7 gap are that load curtailment renewals and Qualifying Facilities contract assumptions may  
8 eliminate the need for 2009 resource. Subsequently, pursuant to a conversation with Staff,  
9 the public hearing scheduled for October 25 was taken off the Commission's agenda.

10         PacifiCorp expects to complete that update and file the results on or about  
11 November 5, 2005. PacifiCorp expects that the update will change the timing of the next  
12 resource and can be reasonably expected to change the benchmark option used in the next  
13 RFP. However, much of the work already completed on RFP 2009 can be used in updating  
14 the RFP for these changes and the timing of the next resource is expected to require action on  
15 the draft RFP early next year, therefore, it would not be efficient to simply terminate this  
16 docket. Accordingly, PacifiCorp believes that parties and the independent evaluator will  
17 benefit from a suspension in the RFP 2009 review process which will accommodate  
18 additional time to review any changes and updates.

19         4.         For these reasons, PacifiCorp requests that the RFP review process be  
20 temporarily suspended. PacifiCorp will continue to keep the parties and Commission Staff  
21 informed after the November 5, 2005 release of the IRP Update.

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**Conclusion**

WHEREFORE, PacifiCorp respectfully requests that the Commission enter an order temporarily suspending the RFP 2009 review process in the above-referenced proceeding as discussed herein.

DATED: October 27, 2005.

STOEL RIVES LLP



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Katherine A. McDowell  
Jennifer H. Martin  
Jeanette C. Schuster

Attorneys for PacifiCorp

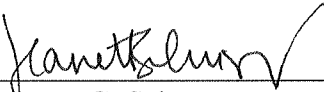
## CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing document upon the parties of record in this proceeding by first-class mail and electronic mail, addressed to said parties/attorneys' addresses as shown below.

D. Douglas Larson  
PacifiCorp  
One Utah Center  
201 South Main Street, Suite 2300  
Salt Lake City, UT 84111

Syed Rezvi  
Oregon Public Utility Commission  
PO Box 2148  
Salem, OR 97301-2148

DATED: October 27, 2005.

  
\_\_\_\_\_  
Jeanette C. Schuster

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1208**

In the Matter of PACIFICORP Draft 2009  
Request for Proposals

**PACIFICORP'S  
MOTION TO SUSPEND RFP 2009  
REVIEW**

Pursuant to OAR 860-013-0031, PacifiCorp (or the “Company”) hereby requests that the Oregon Public Utility Commission (the “Commission”) temporarily suspend the RFP 2009 review process to extend the time for party and Commission consideration and decision. In support of this application, PacifiCorp states as follows:

1. On June 28, 2005, consistent with the guidelines established by the Commission for conducting competitive bidding solicitations in Order 91-1383, PacifiCorp filed a request for approval of its 2009 Request for Proposals for a Flexible Resource (“RFP 2009”). PacifiCorp requested that the Commission issue an order approving RFP 2009 no later than 90 days after the filing date, or by September 26, 2005.

2. By letter dated September 2, 2005, PacifiCorp requested the Commission to defer Commission consideration of and issuance of an order on PacifiCorp’s RFP 2009 by approximately 30 days in order to provide PacifiCorp with an opportunity to ascertain what impact, if any, there will be to the amount and/or timing of the 2009 need based on the Company’s currently ongoing IRP Action Plan update. In its letter, PacifiCorp explained that, while no formal schedule has been adopted by the Commission in this proceeding, Order No. 91-1383 contemplates that the review process for draft RFPs will be approximately 60 days with a Commission public meeting for Commission Staff and party comment. PacifiCorp requested that the Commission consideration of the draft RFP 2009 be conducted at the October 25, 2005 Commission public hearing. Administrative Law Judge

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/s/ Jeanette C. Schuster

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