



September 22, 2006

VIA ELECTRONIC FILING

Oregon Public Utility Commission
550 Capitol Street NE, Ste 215
Salem, OR 97301-2551

Attn: Vikie Bailey-Goggins, Administrator
Regulatory and Technical Support

RE: Docket No. AR-510– In the Matter of Rulemaking to Amend Rules in OAR 860,
Division O28 Relating to Sanctions for Attachments to Utility Poles and Facilities

Dear Ms. Bailey-Goggins,

Enclosed for filing is PacifiCorp's Motion for Extension of Time to File Initial Comments in the above reference docket.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com.

By Fax: (503) 813-6060

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 800
Portland, OR 97232

Please direct informal questions with respect to this filing to Rodger Weaver at 503-813-5546.

Sincerely,

Andrea L. Kelly by Cecil L. Coleman

Andrea L. Kelly
Vice President, Regulation

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

AR 510

In the Matter of)
Rulemaking to Amend Rules in OAR 860,) MOTION FOR EXTENSION
Division 028 Relating to Sanctions for) OF TIME TO FILE INITIAL
Attachments to Utility Poles and Facilities.) COMMENTS

Pursuant to ORS 183.335 and OAR 860-013-0031 and 860-013-0050, PacifiCorp (doing business as Pacific Power and Light) files this Motion seeking an extension of time to file initial comments in the above-referenced docket. Specifically the Company requests an extension of four additional business days to allow it to file its comments by October 4, 2006. PacifiCorp notes that the October 4 date will allow other parties time to respond to its comments in the October 5 Workshop. In support of its Motion, PacifiCorp states as follows:

- 1) Formal notice of the initiation of this docket was received September 15, 2006, via a letter from Chairman Beyer inviting all interested persons to attend a workshop on September 20, 2006, addressing the Oregon Joint Use Association Board’s proposed changes to the sanction rules.
- 2) PacifiCorp representatives attended that workshop and noted a number of potential issues that were not addressed in the Oregon Joint Use Association Board’s proposed rules.
- 3) PacifiCorp would like a reasonable opportunity to evaluate those potential issues and formulate its comments.
- 4) In fulfillment of the Chairman’s commitment to process AR 510 concurrently with AR 506, a Ruling was issued by the Chief Administrative Law Judge on September 20, 2006, establishing the following AR 510 procedural schedule:

First round of comments September 28, 2006
Workshop with participants October 5, 2006, 9:00 a.m.
Workshop with participants October 12, 2006, 9:00 a.m.-12:00 p.m.
Workshop with Commissioners October 12, 2006, 1:30 p.m.
Second round of comments October 26, 2006
Public Comment Hearing November 8, 2006, 9:00 a.m.
The deadline for public comment in this docket is November 8, 2006, at 5:00 p.m.

- 5) Given the above procedural schedule, the time needed by PacifiCorp to further examine the Oregon Joint Use Association Board’s proposed rules and to address

the issues and concerns raised at the workshop, is more than the existing schedule will allow.

- 6) PacifiCorp's ability to comply with this six business-day turn-around for comments is further compromised by the fact that the key personnel at PacifiCorp who would normally be assigned to evaluate and draft rule-language and/or comments in this docket are currently engaged in drafting initial comments to the Staff's proposed rules in AR 506 (phase II), and two of these same individuals are also scheduled to attend the Joint Use Conference in Nevada during three out of those six business days. These factors highlight PacifiCorp's need for an extension of time to evaluate the proposed rules and draft any comments it may choose to submit.
- 7) PacifiCorp proposes that, should this extension be granted, it could submit its comments by October 4, 2006.
- 8) A four-business day extension of time to file comments is reasonable under the circumstances, and will not harm the interest of any other person or entity involved in this rulemaking, nor deprive any interested person or entity of any right, and will not impact the remainder of the procedural schedule established for this docket.

For the foregoing reasons, PacifiCorp respectfully requests that the Commission grant it a reasonable extension of time, until October 4, 2006, in which to assimilate the knowledge gained at the workshop, and then draft and file constructive initial comments to the Oregon Joint Use Association Board's proposed rules on sanctions.

Respectfully submitted



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