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February 3, 2009

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

Attention Vikie Bailey-Goggins, Administrator
Regulatory and Technical Support

Re: Docket UA-141 – Application of PacifiCorp for Exclusive Service Territory

Dear Ms. Vikie Bailey-Goggins:

On January 16, 2009, PacifiCorp submitted to your office an application for exclusive service territory. The application concerns a section of unallocated electric service territory located in Sherman County in the general area of Hay Canyon. As discussed in more detail below, PacifiCorp application fails to acknowledge that Wasco Electric Cooperative (“WEC”) provides electric service to two residential and farm customers in the area for which PacifiCorp submitted its Application.

PacifiCorp filed its application for exclusive service territory pursuant to ORS 758.435 and OAR 860-025-0020. Section (4) of OAR 860-025-0020 requires an applicant to declare that “no other person is providing a similar utility service within such territory.” In its application, PacifiCorp declared that within the unallocated area concerning its application, “Wasco [Electric Cooperative] does not currently serve any customers within the Hay Canyon area.” PacifiCorp statement is incorrect.

Attachment A is a map of the Hay Canyon area. The white area depicts the unallocated territory in Hay Canyon area. WEC’s current exclusive service territory is shaded in pink. WEC’s existing electric distribution lines and service meters are represented with the black lines.

Attachment A shows that WEC has distribution facilities and two retail electric service customers in the unallocated territory. The two retail customers are members of WEC. They are Pat Bird and Fran O’Brian, which WEC has served since, 1983 and 1990, respectively. WEC has served prior members at these locations since the late 1950s and 1960s.

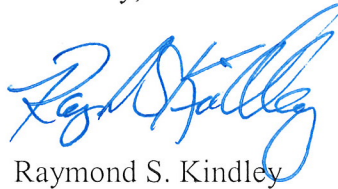
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PacifiCorp's application under OAR 860-025-0020 is deficient because it misrepresents an essential fact necessary to satisfy the requirement in section (4) of that regulation. WEC objects to PacifiCorp's application and requests that the Commission terminate its proceeding concerning PacifiCorp's application. If the Commission continues to proceed with PacifiCorp's application, WEC respectfully requests a Commission hearing to address WEC's rights to continue to provide utility service in the Hay Canyon area and the application of OAR 860-025-0020 to PacifiCorp's submission.

Sincerely,

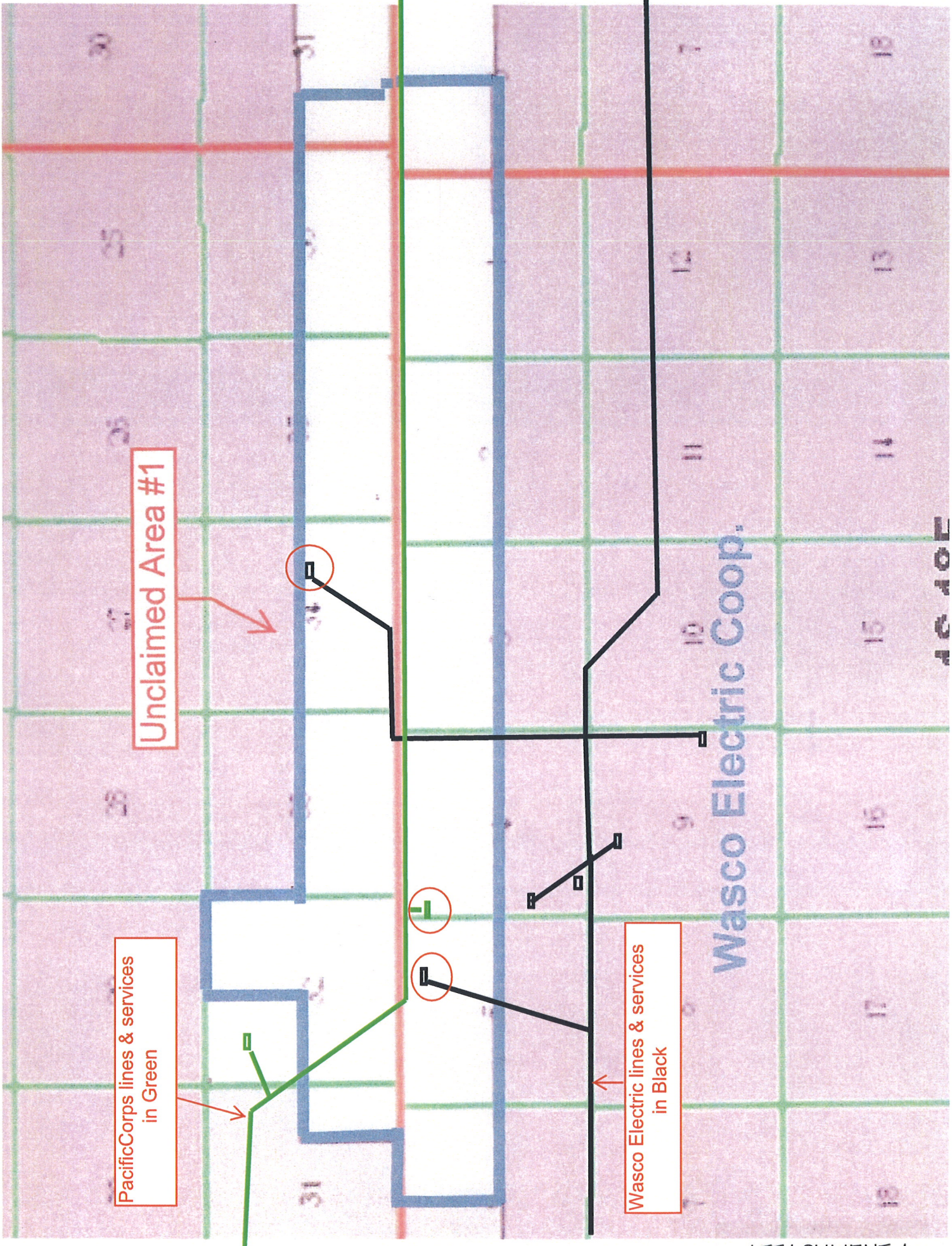


Raymond S. Kindley
General Counsel for Wasco Electric Cooperative
Cable Huston Benedict Haagensen & Lloyd, LLP

RSK/tb

Enclosures

cc: Jeff Davis, General Manager
Wasco Electric Cooperative, Inc.



Unclaimed Area #1

PacificCorps lines & services in Green

Wasco Electric lines & services in Black

Wasco Electric Coop.

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **LETTER REGARDING**
PACIFICORP'S APPLICATION FOR EXCLUSIVE SERVICE TERRITORY via
electronic mail and/or First Class Mail on the Service List below:

PACIFIC POWER OREGON DOCKETS 825 NE MULTNOMAH ST., STE. 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com	MICHELLE R MISHOE LEGAL COUNSEL 825 NE MULTNOMAH ST., STE. 2000 PORTLAND, OR 97232 Michelle.mishoe@pacificorp.com
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DATED this 3rd day of February, 2009.

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