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August 23, 2013

VIA ELECTRONIC FILING AND FIRST CLASS MAIL

PUC Filing Center
Public Utility Commission of Oregon
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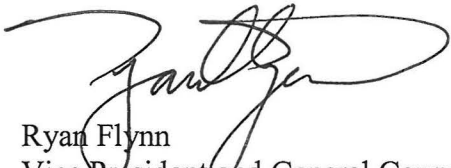
Re: Docket UE 262

On July 25, 2013, Portland General Electric Company (PGE) filed a Second Partial Stipulation (Stipulation) in this docket. Among other issues, the Stipulation resolved the long-term direct access issues raised in the case. The Stipulation originally stated that PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) “takes no position on this Stipulation.” On August 20, 2013, PGE submitted an errata filing to the Stipulation that removed this specific language so the relevant sentence now reads “PacifiCorp intervened to monitor this docket and did not participate in settlement negotiations.” PacifiCorp appreciates PGE’s and the stipulating parties’ willingness to submit an errata filing in the above-referenced docket.

PacifiCorp intervened in docket UE 262 in part to monitor the disposition of the issues related to direct access. In Order No. 12-500, the Public Utility Commission of Oregon directed PacifiCorp “to file a tariff offering to provide a five-year opt-out program that allows a qualified customer to go to direct access and pay fixed transition charges for the next five years, and then to be no longer subject to transition adjustments.” Consistent with these directives, on February 28, 2013, PacifiCorp filed Advice No. 13-004, which was docketed as UE 267. With that filing, the Company submitted Schedule 296, Transition Adjustment, Five-Year Cost of Service Opt-Out. This tariff offering allows a customer to fully transition off of cost-based supply service after five years and no longer pay Transition Adjustments or Schedule 200 Base Supply Service rates. Importantly, PacifiCorp designed its five-year opt-out program taking into account PacifiCorp’s particular generation portfolio and its status as a multi-state utility.

To ensure that PacifiCorp is not prejudiced by the resolution of docket UE 262 before it has a chance to fully develop the record in docket UE 267, the Company respectfully requests that if the Commission approves the Stipulation in docket UE 262, the Commission also recognize that the Stipulation was entered into voluntarily by the parties and therefore approval of the stipulation is not precedential with respect to direct access issues in general or to PacifiCorp docket UE 267. Approving the Stipulation with a specific finding that its terms are not intended to resolve any issues in docket UE 267 is consistent with Commission precedent¹ and the explicit terms of the Stipulation and will not prejudice any party to the Stipulation.²

Very truly yours,

A handwritten signature in black ink, appearing to read "Ryan Flynn", with a large, sweeping flourish extending to the right.

Ryan Flynn
Vice President and General Counsel
Pacific Power

¹ See, e.g., *PacifiCorp's 2012 Transition Adjustment Mechanism*, Docket No. UE 227, Order No. 11-435 at 23 (Nov. 11, 2011) (expressly approving terms of stipulation on a non-precedential basis).

² Paragraph 19 of the Second Partial Stipulation states that the parties agree that no provisions of the agreement are "appropriate for resolving issues in any other proceeding."

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing document on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

UE 262

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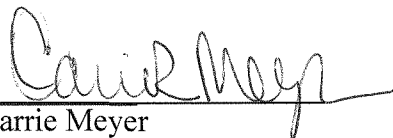
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Dated this 23rd day of August.


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