

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

3 **UE 246**

4 In the Matter of

5 PACIFICORP, dba PACIFIC POWER

6 Request for a General Rate Revision.

MOTION TO EXTEND DUE DATE FOR
TESTIMONY

(Expedited Consideration Requested.)

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8 Pursuant to OAR 860-001-0090(1)(h) and OAR 860-001-0420, Staff of the Public Utility
9 Commission of Oregon (“Staff”) asks the administrative law judge to allow a two-day extension
10 of time (from June 18, 2012 to June 20, 2012) for Staff and intervenors to file testimony on one
11 set of issues in the above-captioned docket – whether Pacific Power environmental compliance
12 investments in the Naughton Units 1 and 2, Dave Johnston Unit 4, Hunter Units 1 and 2,
13 Wyodak, and Jim Bridger Unit 3 coal fired plants were prudent. Staff also asks for a two-day
14 extension for PacifiCorp’s next round of testimony on these same issues (from July 17 to July
15 19, 2012).

16 Staff and intervenor testimony regarding all issues presented in PacifiCorp’s general rate
17 case is due on June 18, 2012 and PacifiCorp’s response testimony is due on July 17, 2012. **Staff**
18 **and Intervenor testimony and PacifiCorp testimony on all issues in this docket, except for**
19 **those noted above, would still be due on June 18, 2012, and July 17, 2012, respectively,**
20 **under this motion.**

21 Staff has contacted the Citizens’ Utility Board, the Industrial Customers of Northwest
22 Utilities, Renewable Northwest Project, the Sierra Club and Pacific Power regarding this request.
23 None of these parties object. Staff was not successful in reaching the other parties to the docket
24 in time to note their positions on this motion.

25 Staff asks for the extension of time because it needs additional time to complete and
26 finalize its testimony regarding the environmental compliance upgrades to Pacific Power’s coal

1 units. Whether the compliance upgrade at the Bridger coal plant (Unit 3) was prudent is at issue
2 in Idaho Power's general rate case, Docket No. UE 233. Due to the complexity and the
3 overlapping nature of these issues presented in two different cases, the development and writing
4 of testimony requires a significant amount of Staff resources. Staff currently has a very large
5 caseload. Accordingly, Staff needs additional time in which to complete the testimony in this
6 case, as well as the testimony regarding investment in the Bridger Unit 3 coal plant upgrade
7 presented in Idaho Power's general rate case.¹

8 Staff requests expedited consideration of this motion under OAR 860-001-420(7). Staff
9 also requests that the administrative law judge shorten the time for response.

10
11 DATED this 14th day of June 2012.

12 Respectfully submitted,

13 JOHN R. KROGER
14 Attorney General

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16 Stephanie S. Andrus, #92512
17 Senior Assistant Attorney General
18 Of Attorneys for Staff of the Public Utility
19 Commission of Oregon
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26 ¹ Staff is also filing a motion to extend by two days the due date for its testimony regarding coal
plant upgrades in Idaho Power's general rate case (Docket No. UE 233).

CERTIFICATE OF SERVICE

I certify that on June 14, 2012, I served the foregoing Motion upon all parties of record in this proceeding by delivering a copy by electronic mail only as all parties waive paper service.

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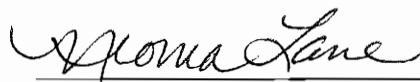
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