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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for PacifiCorp d/b/a Utah
Power & Light Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

In the Matter of the Investigation of
Interjurisdictional Issues Affecting PacifiCorp
d/b/a Utah Power & Light Company

Case No. PAC-E-02-3

Motion of PacifiCorp for Ratification of Inter-
Jurisdictional Cost Allocation Protocol

Since April 2002, PacifiCorp (or the "Company") and other interested parties have engaged in a collaborative Multistate Process ("MSP") investigating various issues faced by the Company as a multi-state utility subject to the jurisdiction of six state regulatory commissions. The MSP was endorsed by the Commission when it opened this investigatory docket.

MSP meetings were attended in person by in excess of 50 individuals representing some 18 entities from the states of Utah, Oregon, Wyoming, Washington and Idaho. These included representatives of state commission policy staffs, advocacy staffs, industrial customers and consumer groups. A number of other people participated by telephone. In addition to the MSP meetings, the Company participated in a number of separate meetings with representatives from individual states or groups of states and conducted various technical workshops. More formal hearings were conducted in some states to review MSP progress. There were weekly telephone conferences and e-mail exchanges. There was a dedicated web site for information sharing. Throughout the process, the Company responded to a large number of formal and informal data requests from the parties.

The last MSP meeting occurred in July 2003. At that meeting, the Company was encouraged to develop and file a specific proposal for resolving MSP issues that was consistent with the results of the analyses that had been conducted and responsive to the views expressed by MSP participants.

PacifiCorp has developed an “MSP Solution” which is embodied in a document entitled “PacifiCorp Inter-Jurisdictional Cost Allocation Protocol” (the “Protocol”) which is attached to and incorporated in this motion. The Protocol describes how PacifiCorp’s generation, transmission and distribution costs will be allocated or assigned to PacifiCorp’s six retail jurisdictions. The Protocol also describes mechanisms for ensuring continued dialog among interested parties regarding PacifiCorp inter-jurisdictional cost allocation issues and procedures for resolving concerns and inconsistent policies that may arise among the Company’s state jurisdictions in the future.

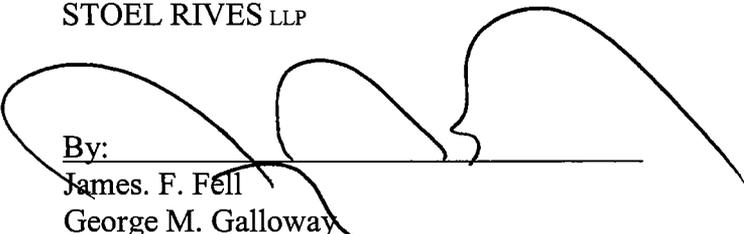
PacifiCorp moves that the Commission ratify the Protocol.

PacifiCorp’s motion is supported by the attached prefiled direct testimony and exhibits of Andrew N. MacRitchie, Andrea L. Kelly, Gregory N. Duvall and David L. Taylor. As more fully explained in the prefiled testimony, Commission ratification of the Protocol will resolve current differences among PacifiCorp’s retail jurisdictions concerning needed new resources and cost allocation methods. Ratification will afford PacifiCorp assurance that it will have a reasonable opportunity to recover prudent investments in new generation and transmission facilities and required improvements to existing facilities. This, in turn, will ensure that the Company’s customers continue to receive safe and reliable electricity service at reasonable prices.

DATED: September 29, 2003.

Respectfully submitted,

STOEL RIVES LLP

By:  _____

James. F. Fell

George M. Galloway

Attorneys for PacifiCorp, d/b/a Utah
Power & Light Company

CERTIFICATE OF SERVICE

I certify that I have served the foregoing Motion on the persons shown below by mailing a copy by First Class U.S. Mail, postage prepaid, properly addressed to each.

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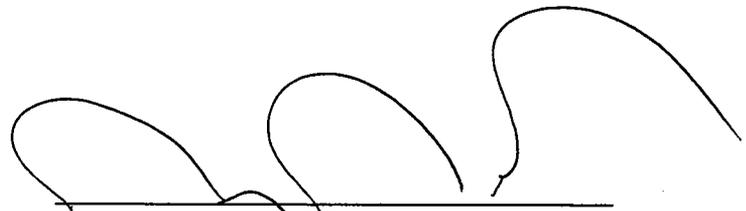
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Dated this 29th day of September, 2003.



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