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IDAHO PUBLIC
UTILITIES COMMISSION

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

DEL RAY HOLM,)	Case No. PAC-E-03-07
)	
Petitioner,)	PACIFICORP'S RESPONSE TO
)	PETITIONER'S REPLY
vs.)	
)	
UTAH POWER & LIGHT COMPANY/ PACIFICORP,)	
)	
Respondent.)	
)	

COMES NOW PacifiCorp, by and through its attorney, and presents this Response to
Petitioner's Reply to PacifiCorp's Answer and Motion to Dismiss. PacifiCorp respectfully
requests that the Commission consider this Response in its deliberations in this matter, and states

that the need for the Response is driven by new claims made in Petitioner's Reply. In response to Petitioner's Reply, PacifiCorp states as follows:

1. Petitioner's asserted need for a detailed itemization of costs and specifications appears to be contradicted by the fact that it obtained the bid from Arco Electric Inc. which it submitted with its Reply.

2. In its Reply, Petitioner now improperly seeks to change the relief it sought in this case by requesting that PacifiCorp's Electric Service Regulation No. 12 "be amended as necessary for customer installation of conversions." In doing so, Petitioner apparently concedes that there is no reason for the Commission to grant the relief originally sought, because Regulation 12 does not allow for customer-built conversions to underground lines.

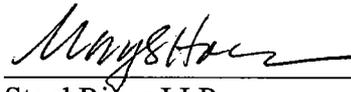
3. By way of a reply to a motion to dismiss, Petitioner now seeks to have the Commission adopt a policy (which would presumably also be applicable to Idaho Power and Avista)¹ of requiring the electric utility to allow customers to construct conversions. Petitioner's untimely request in this regard is unsupported, fails to consider the safety issues raised by having others performing construction underneath existing energized lines, and should be rejected.

4. Petitioner's additional and new request for relief that the "Commission adopt such other relief as necessary to ensure that PacifiCorp's monopoly not be used in a manner to inflict unfair, unjust and unreasonable charges and rates upon the Idaho customer" is unnecessary and should be rejected. PacifiCorp is already subject to extensive regulation with respect to its rates and service, and the Commission actively exercises its jurisdiction to ensure that PacifiCorp's rates and service are fair, just and reasonable.

¹ It is PacifiCorp's understanding that neither Idaho Power nor Avista has a tariff provision allowing for customer-

DATED this 20th day of May, 2003.

PacifiCorp



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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May, 2003, I caused to be served, via fax and United States mail, postage prepaid, a true and correct copy of the foregoing PacifiCorp's Response to Petitioner's Reply to the following:

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