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UTILITIES COMMISSION



March 9, 2006

Idaho Public Utilities Commission  
472 West Washington  
Boise, ID 83702-5983

PAC-E-06-02

Attention: Jean D. Jewell  
Commission Secretary

Re: In the Matter of the Application of the PacifiCorp Petition Requesting that its  
Biennial Unbundled Cost Information Reporting Requirement be Discontinued

PacifiCorp (d.b.a. Utah Power & Light Company) hereby submits for filing an original and eight  
copies of its Petition of PacifiCorp d/b/a Utah Power & Light Company Requesting that its  
Biennial Unbundled Cost Information Reporting Requirement be Discontinued.

Service of pleadings, exhibits, orders and other documents relating to this proceeding should be  
served on the following:

Lisa Nordstrom  
PacifiCorp  
825 NE. Multnomah, Suite 1800  
Portland, OR 97232  
[lisa.nordstrom@pacificorp.com](mailto:lisa.nordstrom@pacificorp.com)

Bob Lively  
PacifiCorp  
One Utah Center, Suite 2300  
201 South Main  
Salt Lake City, UT 84111  
[bob.lively@pacificorp.com](mailto:bob.lively@pacificorp.com)

It is respectfully requested that all formal correspondence and Staff requests regarding this  
material be addressed to:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 800  
Portland, Oregon, 97232

By fax: (503) 813-6060

Sincerely,

D. Douglas Larson  
Vice President, Regulation  
Enclosures

Lisa Nordstrom (ISB #5733)  
PacifiCorp  
825 N.E. Multnomah, Suite 1800  
Portland, OR 97232  
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Lisa.Nordstrom@PacifiCorp.com

Attorneys for PacifiCorp

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE PACIFICORP ) PETITION REQUESTING THAT ITS ) BIENNIAL UNBUNDLED COST ) INFORMATION REPORTING ) REQUIREMENT BE DISCONTINUED. )</b>	<b>CASE NO. PAC-E-06- <u>02</u>  PETITION OF PACIFICORP</b>
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**COMES NOW**, PacifiCorp, d/b/a Utah Power & Light Company (“PacifiCorp” or the “Company”) and hereby petitions the Idaho Public Utilities Commission (“IPUC” or the “Commission”), pursuant to IPUC Rule of Procedure 53, to issue an Order modifying or rescinding Order No. 28804, as it applies to PacifiCorp, to no longer require the Company to file biennial cost information-unbundling reports (“Cost Reports”) with the Commission. This Petition, a companion to that filed by Idaho Power Company in IPC-E-06-4, is based on the following:

I.

In 1997, in response to concerns regarding the potential effects of electric deregulation on retail choice, the Idaho State Legislature enacted Chapter 403, Session Laws of Idaho 1997, pp. 1279-1281, that created Idaho Code §§ 61-338 and 61-339. Under these statutes, electric suppliers in the state of Idaho with more than 1,000 customers were required to file unbundled cost information with the Commission. The Commission was to compile the unbundled cost

information and provide it to the Governor and Legislature. The law contained a sunset provision and became null and void on January 1, 1999.

II.

In response to Idaho Code §§ 61-338 and 61-339, the Commission instituted Case No. GNR-E-97-1 to provide for the method and manner by which the Cost Reports would be compiled and submitted to the Commission. The Commission compiled the information and submitted the reports as required by law.

III.

Subsequent to Case No. GNR-E-97-1, the Commission, on its own authority, required the investor-owned utilities under its jurisdiction to continue to file Cost Reports on an annual basis beyond the January 1, 1999 sunset provision of the original legislation. The PacifiCorp proceeding was docketed as Case No. UPL-E-98-1. See Order Nos. 27678 and 28037.

IV.

On June 8, 2001, PacifiCorp filed an Application with the Commission requesting that the Commission authorize the discontinuance of the annual filing of the Cost Reports (Case No. PAC-E-01-9). In its 2001 Application, PacifiCorp stated that the discontinuance of Cost Reports filings would have no effect on the ability of the Commission to require that appropriate cost information be submitted in other proceedings. In Order No. 28804 issued on August 15, 2001, the Commission required PacifiCorp to continue filing the Cost Reports with the Commission on a biennial basis. The Company has filed Cost Reports with the Commission every other year since the issuance of Order Nos. 28804 and 29051.

V.

In Comments submitted in Case No. PAC-E-01-9 on July 5, 2001, the Commission Staff

conceded that, under normal conditions, “costs change relatively slowly.” Staff Comments at 3. PacifiCorp contends that general rate cases and other filings provide the Commission and its Staff the opportunity to review the Company’s costs in significant detail. In 2005, the Company filed a general rate case (Case No. PAC-E-05-1) that underwent significant scrutiny by multiple parties. PacifiCorp also intends to file another general rate case in April 2006. The Company anticipates that regular rate actions will be needed in the future to recover its increasing costs and capital investments.

In addition to the thorough review of costs afforded by rate cases, the Commission and its Staff also receive PacifiCorp’s annual results of operations that are filed with the Idaho Commission. Pursuant to the stipulation signed in Case No. PAC-E-02-3, PacifiCorp agreed to provide these reports for the 10 years following the Commission’s ratification of the Revised Protocol, PacifiCorp’s inter-jurisdictional cost allocation methodology.

## VI.

Given that the Company intends to file annual results of operations and anticipates regular rate actions in the future, PacifiCorp believes that the Commission and its Staff will continue to have the opportunity to review the Company’s costs in equivalent or greater detail than that afforded by the biennial Cost Reports. Accordingly, PacifiCorp submits that it is in the public interest to permit the Company to discontinue filing the Cost Reports required by Order Nos. 28804 and 29051.

VII.

Service of pleadings, exhibits, orders and other documents relating to this proceeding should be served on the following:

Lisa Nordstrom  
PacifiCorp  
825 N.E. Multnomah, Suite 1800  
Portland, OR 97232  
[Lisa.Nordstrom@PacifiCorp.com](mailto:Lisa.Nordstrom@PacifiCorp.com)

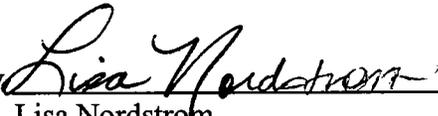
Bob Lively  
One Utah Center, Suite 2300  
201 South Main  
Salt Lake City, UT 84111  
[Bob.Lively@PacifiCorp.com](mailto:Bob.Lively@PacifiCorp.com)

VIII.

PacifiCorp requests this Petition be processed under IPUC Rule of Procedure 201, et al., allowing for consideration of issues to be processed under Modified Procedure, i.e., by written submission rather than by an evidentiary hearing.

WHEREFORE, PacifiCorp respectfully requests the Commission enter its Order authorizing PacifiCorp to discontinue filing the biennial Cost Report required in Case No. PAC-E-01-9 and pursuant to Order Nos. 28804 and 29501.

Respectfully submitted this 9<sup>th</sup> day of March 2006.

By   
\_\_\_\_\_  
Lisa Nordstrom  
Attorney for PacifiCorp

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on the 9<sup>th</sup> day of March 2006, I served a true and correct copy of the foregoing PETITION upon the following named parties by the method indicated below, and addressed to the following:

Idaho Public Utilities Commission  
472 W. Washington  
P.O. Box 83720  
Boise, ID 83720-0074

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Cece Gassner  
Deputy Attorney General  
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Monica Moen  
Barton L. Kline  
Idaho Power Company  
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Peggy Ryan  
Supervisor, Regulation Administration