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May 14, 2007

***VIA ELECTRONIC FILING
AND FIRST CLASS MAIL***

Oregon Public Utility Commission
550 Capitol Street NE, Suite 215
Salem, OR 97301-2551

Attention: Vikie Bailey-Goggins
Administrator, Regulatory Operations

Re: PacifiCorp's Reply in Opposition to Motion
Docket No. UM 1129

Enclosed for filing is PacifiCorp's Reply in Opposition to Motion by Sherman County Court and J.R. Simplot Company in the above-captioned docket. A copy of this filing was served on all parties as indicated on the attached certificate of service.

Sincerely,

A handwritten signature in cursive script that reads "Andrea L. Kelly" followed by a stylized flourish.

Andrea L. Kelly
Vice President, Regulation
PacifiCorp

Enclosure
cc: Service List for Docket No. UM 1129

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM-1129

In the Matter of the Public)	
Utility Commission of Oregon)	
Staff's Investigation Relating to)	PACIFICORP'S REPLY IN
Electric Utility Purchases from)	OPPOSITION TO MOTION
Qualifying Facilities)	
)	

Pursuant to OAR 860-013-0031, PacifiCorp hereby replies in opposition to Sherman County Court (“Sherman County”) and J.R. Simplot Company’s (“J.R. Simplot”) (collectively the “Movants”) motion to institute a supplementary proceeding to review avoided costs rates contained in compliance filings made by Idaho Power Company, PacifiCorp d/b/a Pacific Power & Light (“PacifiCorp”) and Portland General Electric Company.

BACKGROUND

In Order No. 05-584, the Oregon Public Utility Commission (“Commission”) examined the use of the two-year filing cycle for avoided cost rates as those rates apply to qualifying facilities (“QFs”).¹ At that time, the Commission affirmed the use of a two-year filing cycle.² The Commission also determined that it may be appropriate to review a utility’s avoided cost rates between the two-year filing cycle.³ This review can occur

¹ Docket No. UM 1129, Order No. 05-584, p. 29.

² *Id.*

³ *Id.*

either at the Commission's or another party's motion.⁴ Pursuant to this finding, Sherman County and J.R. Simplot filed a motion to institute a supplementary proceeding.

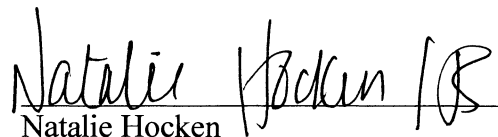
PACIFICORP'S REPLY

Pursuant to OAR 860-029-0080 (8), PacifiCorp is anticipating filing updated avoided cost studies in July 2007, approximately 2 months from now. Given the timing of PacifiCorp's planned avoided cost studies filing, initiating an additional supplementary proceeding at this time would be premature. PacifiCorp does not believe that conducting the supplementary proceeding at this time would be an efficient use of resources and would require PacifiCorp to unnecessarily accelerate its planned July filing with minimal benefit to the parties involved. As a result, PacifiCorp believes that denying this motion would allow the parties to complete their current process and allow the Commission to conduct the same review starting in July.

WHEREFORE, PacifiCorp respectfully requests that the Commission deny the Movants' motion to institute a supplementary proceeding to review avoided cost rates.

DATED this 14th of May 2007.

Respectfully submitted,


Natalie Hocken
Vice President & General Counsel
PacifiCorp

⁴ *Id.*

CERTIFICATE OF SERVICE

I certify that I have cause to be served the foregoing **PACIFICORP'S REPLY IN OPPOSITION TO MOTION** in OPUC Docket No. UM 1129 by electronic mail and/or first class mail to the parties on the attached service list.

DATED this 14th day of May, 2007.

/s/ 
Peggy Ryan

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UM 1129

W= Waive paper Service, C= Confidential

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