

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1209**

In the Matter of
MIDAMERICAN ENERGY HOLDINGS
COMPANY

STAFF RESPONSE TO MEHC'S AND
PACIFICORP'S MOTION TO SHORTEN
RESPONSE TIME TO DATA REQUESTS

Application for Authorization to Acquire
Pacific Power & Light, dba PacifiCorp

On November 21, 2005 MEHC and PacifiCorp moved to shorten all responses to discovery requests issued on or after November 22nd to five business days. Consistent with the ruling issued by Administrative Law Judge, Christina Smith, Staff files this response to MEHC's and PacifiCorp's Motion.

Staff is generally, with one minor caveat, not opposed to MEHC's and PacifiCorp's request to shorten all responses to discovery requests issued on or after November 22nd to five business days. Specifically, Staff agrees that it will use its best efforts to accomplish a five-day turnaround, while also reserving the right to confer with MEHC and PacifiCorp on any specific request that may require additional time.

Staff views its proposal as generally consistent with MEHC's and PacifiCorp's request. Of course, Staff will not know for certain whether it has the ability to turnaround data requests in a shortened timeframe until it receives the request and determines the appropriate response. Staff's minor modification merely contemplates the possibility that a specific request could require additional time. If such a case arises, Staff agrees to confer with MEHC or PacifiCorp, or both, in an attempt to reach a mutually agreeable resolution.

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1 For the foregoing reasons, with the addition of the proposed modification discussed
2 above, Staff does not oppose MEHC's and PacifiCorp's motion.

3 DATED this 23rd day of November 2005.

4 Respectfully submitted,

5 HARDY MYERS
6 Attorney General

7 /s/ Jason W. Jones
8 Jason W. Jones, #00059
9 Assistant Attorney General
10 Of Attorneys for Public Utility Commission of
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1 **CERTIFICATE OF SERVICE**

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3 I certify that on November 23, 2005, I served the foregoing upon the parties hereto by
4 sending a true, exact and full copy by regular mail, postage prepaid or by hand delivery/shuttle
5 mail and by electronic mail to:

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