

McDowell & Rackner PC



AMIE JAMIESON
Direct (503) 595-3927
amie@mcd-law.com

February 5, 2009

VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket UE 199

Enclosed for filing in the above docket is an original and one copy of Pacificorp's Compliance Filing for Initiation of Commission Proceeding to Resolve TAM Design Issues. A copy of this filing has been served on all parties to this proceeding as indicated on the attached Certificate of Service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Amie Jamieson".

Amie Jamieson

cc: UE 199 Service List

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Dockets UE 199 on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

CUB – OPUC Dockets
Dockets@OregonCUB.org

Robert Jenks
Citizens' Utility Board
bob@oregoncub.org

Kelcey Brown
P.O. Box 2148
Salem, OR 97301
kelcey.brown@state.or.us

Jason Jones
Assistant Attorney General
1162 Court St. NW
Salem, OR 97301-4096
Jason.w.jones@state.or.us

Randall Falkenberg
RFI Consulting, Inc.
PMB 362
8343 Roswell Road
Sandy Springs, GA 30350
consultrfi@aol.com

Irion Sanger
Davison Van Cleve PC
333 SW Taylor, Suite 400
Portland, OR 97204
ias@dvclaw.com

Ryan Flynn
PacifiCorp
ryan.flynn@pacificorp.com

Kevin Higgins
Energy Strategies LLC
khiggins@energystrat.com

Peter J. Richardson
Richardson & O'Leary
peter@richardsonandoleary.com

Oregon Dockets
PacifiCorp
oregondockets@pacificorp.com

Alvin Pak
Sempra Energy Solutions LLC
apak@semprasolutions.com

Greg Bass
Sempra Energy Solutions LLC
gbass@semprasolutions.com

DATED: February 5, 2009



Wendy McIndoo, Legal Assistant
Of Attorneys for PacifiCorp

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UE 199**

4 In the Matter of:

5 PACIFICORP, dba PACIFIC POWER

6 2009 Transition Adjustment Mechanism
7 Schedule 200, Cost-Based Supply
8 Service

**PACIFICORP'S COMPLIANCE FILING
FOR INITIATION OF COMMISSION
PROCEEDING TO RESOLVE TAM
DESIGN ISSUES**

9 **BACKGROUND**

10 In Order No. 08-543, the Public Utility Commission of Oregon ("Commission")
11 adopted an all-party¹ Stipulation in this docket. Under paragraph 17 of the Stipulation,
12 PacifiCorp dba Pacific Power (or the "Company") agreed to convene a series of
13 workshops for the purpose of seeking consensus on the specific elements of future
14 Transition Adjustment Mechanism ("TAM") proceedings. *Re PacifiCorp dba Pacific*
15 *Power, 2009 Transition Adjustment Mechanism Schedule 200, Cost-Based Supply*
16 *Service, Docket UE 199, Order No. 08-543, Appendix A at 7-8 (Nov. 12, 2008). The*
17 *Company also agreed that if the Parties could not reach consensus on the elements of*
18 *TAM updates, revenue growth adjustments, and filing requirements in the workshops, the*
19 *Company would initiate a Commission proceeding to resolve the issues. Id. at 8. The*
20 *Company agreed to initiate this proceeding by January 15, 2009, in order to provide the*
21 *Commission the ability to resolve the proceeding prior to June 1, 2009, or in time to be*
22 *implemented in the Company's first update for the 2010 TAM. Id.*

23 On January 13, 2009, Pacific Power filed a letter providing notice that the Parties
24 agreed to a one-week extension of the January 15, 2009 filing deadline to January 22,

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26 ¹ The Parties to the Stipulation are the Company, Commission Staff ("Staff"), the Citizens'
Utility Board, Industrial Customers of Northwest Utilities, and Sempra Energy Solutions LLC.


1 2009. *Re PacifiCorp dba Pacific Power, 2009 Transition Adjustment Mechanism*
2 *Schedule 200, Cost-Based Supply Service, Docket UE 199, Letter re. Extension of Filing*
3 *Deadline (Jan. 13, 2009).* On January 23, 2009, Pacific Power filed a letter providing
4 notice that the Parties agreed to an additional two-week extension to February 5, 2009.
5 *Re PacifiCorp dba Pacific Power, 2009 Transition Adjustment Mechanism Schedule 200,*
6 *Cost-Based Supply Service, Docket UE 199, Letter re. Extension of Filing Deadline (Jan.*
7 *23, 2009).* By that date, the Parties agreed that the Company must file to initiate a
8 proceeding under paragraph 17 of the Stipulation, assuming the parties do not reach
9 consensus on TAM design.

10 **DISCUSSION**

11 The Parties have had several workshops and meetings on the design of the TAM.
12 While the Parties have made progress toward resolving the elements of TAM updates,
13 revenue growth adjustments, and filing requirements, they have not reached consensus
14 on all issues. The Company therefore requests that the Commission convene a
15 proceeding pursuant to paragraph 17 of the Stipulation. The Company requests that the
16 Commission convene a prehearing conference to set a schedule for this proceeding that
17 will allow it to resolve the TAM issues prior to June 1, 2009, or in time to be implemented
18 in the Company's first update for the 2010 TAM, as provided in paragraph 17 of the
19 Stipulation.

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21 DATED: February 5, 2009.

MCDOWELL & RACKNER PC

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24 Katherine McDowell
Amie Jamieson

25 Attorneys for PacifiCorp
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