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ENERGY DIVISION

Mountain Utilities

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April 27, 2007

California Public Utilities Commission
Energy Division
505 Van Ness Avenue,
San Francisco, CA 94102

Re: General Order 166 Emergency Response Plan for the 12 month period ending June 30, 2006

Attention: Messrs. Brian Schumacher and Werner Blumer

Dear Sirs:

General Order 166 requires jurisdictional electric utilities to comply with certain standards:

1. Prepare an emergency response plan and update the plan annually.
2. Enter into mutual assistance agreements with other utilities.
3. Conduct annual emergency training and exercises using the utilities emergency response plan.
4. Develop a strategy for informing the public and relevant agencies of a major outage.
5. Coordinate internal activities during a major outage in a timely manner.
6. Notify relevant individuals and agencies of an emergency or major outage in a timely manner.
7. Evaluate the need for mutual assistance during a major outage.
8. Inform the public and relevant public safety agencies of the estimated time for restoring power during a major outage.
9. Train additional personnel to assist with emergency activities.
10. Coordinate emergency plans with state and local public safety agencies.
11. File an annual report describing compliance with these standards.
12. Be subject to a restoration performance benchmark for major outages (Over 500,000 customers).
13. Be subject to a call center performance benchmark for major outages (Over 500,000 customers).

In accordance with Standard 11, Mountain Utilities (MU) is enclosing its 2006 Annual Report describing compliance with these standards. In particular, MU's General Order 166 Emergency Response Plan (PLAN) is enclosed to provide you with the current PLAN for the use of the Commission and its staff. The PLAN consists of the following elements:

1. Standard 1 - Emergency Response Plan - updated
2. Standard 1 - Current Emergency Notification List - updated

MU's responses to Standards 2 through 11 and MU's Outage Report per Standard 11 are also enclosed.