

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking for)	
Electric Distribution Facility Standard)	R.96-11-004
Setting)	
_____ U 901 E)	

**PACIFICORP'S
ANNUAL REPORT IN COMPLIANCE WITH
GENERAL ORDER NO. 166**

Pursuant to General Order 166, Standard 11, PacifiCorp hereby submits its report on its compliance with General Order 166 for the period July 1, 2004 through June 30, 2005 ("Compliance Period"). The report demonstrates PacifiCorp's compliance with each of the thirteen standards of the General Order.

Standard 1- Emergency Response Plan:

- The 2005 PacifiCorp Outage Management Procedures consists of one volume. See Attachment B.
- The Outage Management Procedures cover each of the items specified in Standard 1. The following Table 1 sets forth the location in the volume entitled PacifiCorp's Outage Management Procedures where required elements are covered.

Table 1: Location of Topics Covered in Procedures

<u>Requirement</u>	<u>Pages</u>
A. Internal Coordination	3 -9; 15 - 33
B. ISO/TSO Coordination	34
C. News Coordination	44 - 45
D. External and Governmental Coordination	46 - 49
E. Safety Coordination	50 - 51
F. Damage Assessment	10 - 12
G. Restoration Priority Guidelines	13 - 14
H. Mutual Assistance	74 - 78
I. Plan Updates	Table 3

- PacifiCorp's Outage Management Procedures will be updated annually or more frequently as required. Applicable information regarding Company personnel is updated on a daily basis from the Company's Human Resources database.

Standard 2 - Mutual Assistance Agreements

- Many of the Western regional utilities including PacifiCorp belong to the Western Energy Institute (W.E.I.). In order to streamline the administration of mutual assistance agreements, W.E.I. coordinated a Western Region Mutual Assistance Agreement for member signatures. This agreement was signed February 27, 2004. See Attachment C for agreement and list of members.

Standard 3 - Emergency Training and Exercises

- There were two major outages during this Compliance Period that caused PacifiCorp's Outage Management Procedures to be activated. The Company opened Regional Emergency Action Centers (REAC's) in Medford and Portland, Oregon during the following events:
 - December 6 through December 7, 2004
 - January 8 through January 10, 2005

- On December 17, 2004, a multi-departmental simulated Incident Coordination Exercise (I.C.E) named Operation Polar Bear was conducted. The intent of the exercise was to evaluate the Company's management processes, including the ability of various Company departments to work together during major outages. See Attachment D for a description of the scenario, scope, objectives and exercise findings.
- PacifiCorp employees participate in monthly safety meetings to discuss ongoing Company safety standards, including how to respond to emergency situations. An adequate number of employees will be utilized to efficiently deal with the emergency or disaster. Employee phone numbers are available on an "emergency call out list" which is updated and circulated bi-monthly.

Standard 4 - Communications Strategy

- PacifiCorp's strategy for communicating with the media, customers, regulatory agencies, and other governmental organizations is contained in PacifiCorp's Outage Management Procedures.
- Meetings with Del Norte, Siskiyou, Modoc Counties and Crescent City emergency personnel resulted in a request that all communication be directed through the 911 call center. This center will act as a clearing house for communication to relevant agencies.
- Grid Operations will establish and maintain communications with the California Independent System Operator (CAISO), PG&E and BPA for Line 14 and Path 66 transmission lines.

Standard 5 - Activation Standard

- Within an hour of the identification of a major outage or other newsworthy event, PacifiCorp will notify Office of Emergency Services (OES) of the location, possible cause and expected duration of the outage.
- In the event of a major outage that results in PacifiCorp's operation center being without power, a back up generator would supply emergency power to the center and

the base radio station. Dispatch centers would call employees out based on the level of the outage occurring.

- Coordination and responsibility of notification will be with the Regional Information Coordinator.

Standard 6 – Initial Notification Standard

- PacifiCorp will follow the procedures outlined in the CPUC’s Guidelines for Notifying Energy Division of Electrical and Gas Emergencies, dated February 14, 2005.

As soon as possible or each time new blocks of circuits are interrupted:

1. Imminent or planned implementation of Interruptible Electric Load Curtailments or Rotating Outages of firm Electric Load by your utility, either ordered by the ISO (Stage 2 or 3) or necessary by other emergencies.

Within one hour:

2. Outage of electrical service expected to accrue to over 300,000 customer hours, or exceeding 300 megawatts of interrupted load, or affecting more than 10% of your electric customers.

Within one hour:

3. An emergency, involving facilities or personnel, likely to be reported statewide or in more than one major media market.

Within one hour:

4. Interruptions to bulk power supply (generators, transmission lines, or other equipment) that are likely to lead to an ISO declared Stage 2 or 3 emergency on or before the next business day.

Notify by 9 a.m. the next business day:

5. An electric outage affecting more than 30,000 customers, or lasting over 24 hours for 2,500 customers, or expected to total over 60,000 customer hours, or a situation (such as floodwaters threatening a substation) likely to lead to such an outage.

Notify as soon as possible:

6. Electric outages associated with OES declared state of emergency, not otherwise reportable under above criteria.

Standard 7 - Mutual Assistance Evaluation Standard

- Regional Emergency Controller has the responsibility to initiate Mutual Assistance.
- PacifiCorp did not experience a Major Outage which required the initiation of the Mutual Assistance Agreement during this Compliance Period.

Standard 8 - Major Outage and Restoration Estimate Communications

- Upon the identification of a major outage or other newsworthy event, PacifiCorp will update the Company's Integrated Voice Response (IVR) telecommunication system to reflect the location, possible cause and expected duration of the outage. Thereafter updates are provided on a regular basis for the duration of the event.
- When call volume exceeds the IVR system capabilities the Company will activate an external call handling system to divert to 21st Century some of the high call volume coming into the call centers and to prevent long queue times and busy signals.
- Upon activation of the REAC's the Company will provide e-mail notification to the CPUC Energy Division on a regular basis and thereafter for the duration of the event will provide updates. The e-mail notices will contain information related to the location, possible cause, the number of customers without power, number of crews and equipment working to restore power and number of employees involved in the restoration.
- During a major outage the Corporate Communications representatives will make proactive contact with the media to provide storm news releases. The releases will include the number of customers and areas affected, estimated length of outage, and public electrical safety messages wherever possible.

Standard 9 - Personnel Redeployment Planning Standard

- All employees are cross-trained and a plan is in place for performing safety standby activities and assessing damage during a major outage.
- Vehicles are routinely fueled at the end of each day. In the event of a major outage that impacts Company service centers, vehicles would be removed from the garage and parked outside as required.

Standard 10 - Annual Pre-Event Coordination Standard

- The Company does not believe requirement 10 is applicable to PacifiCorp. The Company relies upon NWPP, WECC and BPA to coordinate with CAISO, and participates in coordination meetings and emergency scenarios to ensure a seamless interface in the event of an emergency.

Standard 11 - Annual Report

- PacifiCorp is in compliance with G.O. 166, see Attachment B.
- PacifiCorp's Outage Management Procedures are provided as of October 28 2005.

Standard 12 – Restoration Performance Benchmark for a Measured Event

- As a utility with fewer than 150,000 electric customers PacifiCorp qualifies for the exemption D, Attachment 1 Additional Provisions to G.O. 166.

Standard 13 – Call Center Benchmark for a Measured Event

- As a utility with fewer than 150,000 electric customers PacifiCorp qualifies for the exemption C, Attachment 1 Additional Provisions to G.O. 166.

The following attachments serve to reflect PacifiCorp's compliance with the aforementioned rules:

- Attachment "A" titled PacifiCorp G.O. 166 Compliance Report Year Ending June 30, 2004, describes how PacifiCorp has complied with the Rules previously listed.
- Attachment "B" titled PacifiCorp Outage Management Procedures describes the key activities to be addressed in the event of a major outage.
- Attachment "C" titled Western Region Mutual Assistance Agreement for Electric and Natural Gas Utilities, effective November 14, 2003, describes PacifiCorp's compliance with Standard 2.
- Attachment "D" titled After Action Report – I.C.E. (Polar Bear), March 24, 2005, describes PacifiCorp's compliance with Standard 3.

Number of Repair and Maintenance Personnel

Standard 11 of General Order 166 further requires “the utility shall report on the number of repair and maintenance personnel in each personnel classification in each county (and total throughout the company) as of June 30 of the current and previous year.”

Table 2 is a compilation of these statistics:

**Table 2
PacifiCorp
Number of Repair and Maintenance Personnel**

	June 30, 2004	June 30, 2005
Location	Number of Personnel	Number of Personnel
Alturas	2	2
Crescent City	7	9
Mt. Shasta	6	4
Yreka	25	30
Total California Service Territory	40	45

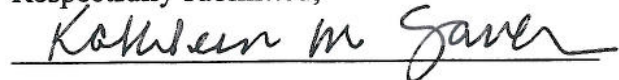
Table 3: Description of Changes

The following is a summary of the changes PacifiCorp made to its 2005 Emergency Response Plan during the Compliance Period:

1. Page 44: Media Hotline toll-free numbers updated.
2. Page 46: Regulatory Contacts phone numbers updated.
3. Page 59: Key Contacts changed to reflect new managers and phone numbers.
4. Page 62 – 67: First Call list changed to reflect California employees.
5. Page 74: Updated Western Region Utilities list
6. Changed Community Business Manager and Customer Business Manager to new title of Regional Community Manager.
7. Changed Corporate Account Manager to new title of Corporate Community Manager.

DATED: October 28 2005

Respectfully submitted,

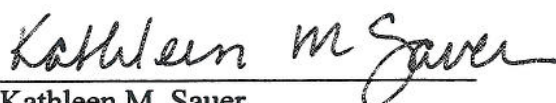


Kathleen M. Sauer
Regulatory Liaison
PacifiCorp

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing document to be served on the following named person(s) on the date indicated below by e-mail or U.S. Postal Service to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at their last known address(es) indicated below:

Dated: October 28, 2005


Kathleen M. Sauer
Regulatory Liaison