

August 2, 2011

***VIA ELECTRONIC MAIL***

Chief ALJ Karen Clopton [kvc@cpuc.ca.gov](mailto:kvc@cpuc.ca.gov)  
ALJ Myra J. Prestidge [tom@cpuc.ca.gov](mailto:tom@cpuc.ca.gov)  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: Comments of PacifiCorp (U 901 E) on Draft Resolution ALJ-272 Extends the Pub. Util. Code §851 Pilot Program Established in Resolution ALJ-186, as modified by Resolutions ALJ-202 and ALJ-244**

Dear Chief ALJ Clopton and ALJ Prestidge,

Pursuant to California Public Utilities Commission (Commission) Rules of Practice and Procedure Section 14.5, PacifiCorp, d.b.a. Pacific Power (Company) submits comments in response to Draft Resolution ALJ-272 (ALJ-272) issued July 13, 2011. PacifiCorp is a multi-jurisdictional utility providing electric retail service to customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp serves approximately 45,000 customers in Del Norte, Modoc, Shasta, and Siskiyou counties in northern California.

ALJ-272 seeks to extend the expiration of the California Public Utilities Code Section 851 (Section 851) advice letter pilot program until August 23, 2012 or until such time as the Commission enters an order regarding the Section 851 advice letter program, whichever occurs first. The Section 851 advice letter pilot program is set to expire August 23, 2011. However, the Commission is considering revisions to the program and desires to extend the program to allow additional time to consider revisions.

PacifiCorp supports the extension of the current Section 851 Advice Letter Pilot Program until August 23, 2012 or until such time as the Commission enters an order regarding the Section 851 advice letter program. Section 851 essentially requires Commission approval of the disposition or encumbrance of any utility property necessary or useful in providing utility service. The Section 851 advice letter program is a streamlined approach to gain approval of asset disposition transactions that are below the \$5 million threshold. PacifiCorp has filed for approval of property disposition transactions using the advice letter pilot program. The majority of these filings have been for transactions valued at less than \$100,000, well below the \$5 million threshold. The pilot program has proven to be useful and has greatly reduced the administrative burden as compared to filing a formal application.

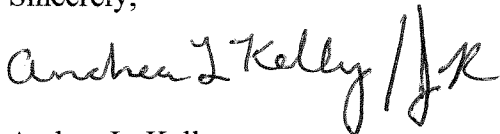
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PacifiCorp appreciates the opportunity to comment on the Draft Resolution. Please direct any questions concerning these comments to Cathie Allen, Regulatory Manager, at (503) 813-5934.

Sincerely,

Handwritten signature of Andrea L. Kelly in black ink, with the initials 'AK' written to the right of the name.

Andrea L. Kelly  
Vice President, Regulation

cc:

Assistant Chief ALJ Janet Econome [jjj@cpuc.ca.gov](mailto:jjj@cpuc.ca.gov)

Andrew Barnsdale, Energy Division, [bca@cpuc.ca.gov](mailto:bca@cpuc.ca.gov)

Service Lists R.98-07-038, R.05-04-005, R.04-09-003, R.06-02-012, R.06-12-016, A.08-02-001,  
R.08-02-007, A.09-05-026, R.09-06-019

Rebecca Giles, Regulatory Case Manager, SDG&E and SoCalGas, [rgiles@semprautilities.com](mailto:rgiles@semprautilities.com)

**Certificate of Service**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have provided via electronic mail or US Mail if an e-mail address has not been provided a true and correct copy of the **PacifiCorp's (U 901 E) Comments on Draft Resolution ALJ-272** to the following parties:

**R.98-07-038; R.05-04-005**

[http://www.cpuc.ca.gov/published/service\\_lists/R9807038\\_2198.htm](http://www.cpuc.ca.gov/published/service_lists/R9807038_2198.htm)

**R.04-09-003**

[http://www.cpuc.ca.gov/published/service\\_lists/R0409003\\_66288.htm](http://www.cpuc.ca.gov/published/service_lists/R0409003_66288.htm)

**R.06-02-012**

[http://www.cpuc.ca.gov/published/service\\_lists/R0602012\\_72126.htm](http://www.cpuc.ca.gov/published/service_lists/R0602012_72126.htm)

**R.06-12-016**

[http://www.cpuc.ca.gov/published/service\\_lists/R0612016\\_75168.htm](http://www.cpuc.ca.gov/published/service_lists/R0612016_75168.htm)

**A.08-02-001**

[http://www.cpuc.ca.gov/published/service\\_lists/A0802001\\_76153.htm](http://www.cpuc.ca.gov/published/service_lists/A0802001_76153.htm)

**R.08-02-007**

[http://www.cpuc.ca.gov/published/service\\_lists/R0802007\\_76232.htm](http://www.cpuc.ca.gov/published/service_lists/R0802007_76232.htm)

**A.09-05-026**

[http://www.cpuc.ca.gov/published/service\\_lists/A0905026\\_78405.htm](http://www.cpuc.ca.gov/published/service_lists/A0905026_78405.htm)

**R.09-06-019**

[http://www.cpuc.ca.gov/published/service\\_lists/R0906019\\_78410.htm](http://www.cpuc.ca.gov/published/service_lists/R0906019_78410.htm)

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Andrew Barnsdale – [bca@cpuc.ca.gov](mailto:bca@cpuc.ca.gov) (e-mail and hard copy)

DATED: August 2, 2011, at Portland, Oregon

\_\_\_\_\_/s/ **Carrie Meyer**\_\_\_\_\_  
Carrie Meyer  
Coordinator, Regulatory Operations