

December 19, 2012

ALJ Regina M. DeAngelis  
ALJ Anne E. Simon  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: PacifiCorp (U 901-E) 2011 Preliminary Annual 33% Renewables Portfolio  
Standard Compliance Report**

Dear ALJ DeAngelis and ALJ Simon,

Enclosed please find a copy of: (1) the public version of PacifiCorp's 2011 Preliminary Annual 33% Renewables Portfolio Standard Compliance Reporting Worksheet and Narrative (Preliminary Report), (2) the confidential version of the Preliminary Report, (3) the Declaration of Jedediah J. Gibson in Support of Claims of Confidentiality of PacifiCorp (Declaration), and (4) PacifiCorp's response to the Narrative Reporting Requirements (Narrative Report). The Preliminary Report contains confidential information which has been redacted from the public version of the Preliminary Report as described in the Declaration. The statements and quantities in the Preliminary Report are verified in the attached officer verification. With respect to statements and quantities in the Preliminary Report, the verification is made based on information and belief, as those matters are believed to be true.

PacifiCorp is a multi-jurisdictional electric utility (MJU) with approximately 1.7 million customers in California, Idaho, Oregon, Utah, Washington and Wyoming. PacifiCorp's California service territory is not connected to the California Independent System Operator (CAISO), but rather PacifiCorp is the balancing authority for its California service territory, which is operated on an integrated basis with other states in the western portion of its multi-state territory. Therefore, bundled energy deliveries to the portion of PacifiCorp's balancing authority area physically located in California are treated differently than deliveries to California balancing authorities.

These unique characteristics of PacifiCorp, the only electric MJU in California, have been recognized by the Legislature when enacting California law and by the Commission when interpreting and implementing California law. More specifically, Senate Bill No. 2 of the California Legislature's 2011 First Extraordinary Session (SB 2 (1X)) describes the unique RPS requirements that apply to PacifiCorp as an MJU. These requirements differ from the requirements of other load serving entities (LSEs).


{00115156;1}

For the December 2012 Preliminary Report, all RPS-obligated retail sellers were provided with a preliminary template. Due to PacifiCorp's unique characteristics, the Commission Staff modified the Preliminary Reporting template to account for the fact that PacifiCorp allocates only a portion of its renewable energy procurement to California.

As noted in the November 16, 2012 email from Mr. Robert Blackney, Energy Division, as well as the December 10, 2012 follow-up email notifying parties of revisions to the Preliminary Report templates, this is a preliminary report. A final RPS compliance reporting template will be issued in the RPS proceeding after the RPS enforcement rules have been established. As this is a preliminary report, the numbers in this report are subject to change based on finalization and verification of procurement volumes, as well as changes that may be necessary to properly allocate generation amongst PacifiCorp's six-state service territory. Furthermore, as the California Energy Commission (CEC) has not finalized the process for retiring renewable energy credits (RECs) in the Western Renewable Energy Generation Information System (WREGIS) and has instructed retail sellers to defer retiring RECs until the process is finalized, PacifiCorp has not retired any RECs for 2011 or 2012 and is not reporting any retirement data at this time in the Preliminary Report. PacifiCorp will report REC retirement data at a later date once the CEC finalizes the WREGIS retirement process.

If you have any questions concerning the Preliminary Report please contact Cathie Allen, Regulatory Manager, at (503) 813-5934.

Very truly yours,



William R. Griffith  
Vice President, Regulation

Enclosures