PACIFICORP'S 2011 Preliminary Annual 33% RPS Compliance Report

Narrative Reporting Requirements

I. Introduction

The following sets forth the supplementary material needed to meet the requirements set forth in Public Utilities Code Section 399.13(a)(3) for PacifiCorp's 2011 Preliminary Annual 33% RPS Compliance Report.

II. Narrative Reporting Requirements - Eligible Renewable Energy Resources

Pursuant to Public Utilities Code Section 399.13(a)(3), each retail seller must include the following narrative information in each annual compliance report and in the final report for each compliance period:

1. The status of any necessary siting and permitting approvals from federal, state, and local agencies for those eligible renewable energy resources procured by the retail seller that have not yet attained their commercial on-line dates.

Response:

PacifiCorp has one eligible renewable energy resource that has not yet been declared commercially operational, a 40 megawatt project located in Idaho. This project is expected to be on-line by December 31, 2012. There are no necessary siting and permitting approvals pending.

2. Identification of all procurement from eligible renewable energy resources located outside California and within the WECC during the period covered by the report.

Response:

Please refer to Table 1 that lists the facilities that are certified by the California Energy Commission that are located outside of California and within the WECC.

Table 1			
Facility Name	Facility City	Facility State	
Ashton	Fremont	UT	
Bend	Bend	OR	
Big Fork	Big Fork	MT	
Blundell I	Milford	UT	
Blundell II	Milford	UT	
Campbell Hill - Three Buttes	Glenrock	WY	
Chevron Casper Wind Farm	Evansville	WY	
Clearwater 1	Idleyld Park	OR	
Clearwater 2	Idleyld Park	OR	

	Table 1	
Facility Name	Facility City	Facility State
Cutler	Collinston	UT
Dunlap I	Medicine Bow	WY
Eagle Point	Eagle Point	OR
Eastside	Klamath Falls	OR
Fish Creek	Ideleyld Park	OR
Foote Creek 1	McFadden	WY
Fountain Green	Fountain Green	UT
Glenrock I	Glenrock	WY
Glenrock III	Glenrock	WY
Goodnoe Hills	Goldendale	WA
Granite	Salt Lake City	UT
Gunlock	Veyo	UT
High Plains	Rock River	WY
Hill Air Force Base	Hill AFB	UT
J BAR 9 Ranch	Cody	WY
Last Chance	Grace	ID
Leaning Juniper	Arlington	OR
Marengo	Dayton	WA
Marengo II	Dayton	WA
McFadden Ridge	Rock River	WY
Mountain Wind I	Fort Bridger	WY
Mountain Wind II	Fort Bridger	WY
Olmstead	Orem	UT
Oneida	Preston	ID
Paris	Paris	ID
Pioneer	Pioneer	UT
Prospect 1	Prospect	OR
Prospect 3	Prospect	OR
Prospect 4	Jackson County	OR
Rock River 1	McFadden	WY
Rolling Hills	Glenrock	WY
Sand Cove	Veyo	UT
Seven Mile Hill I	Medicine Bow	WY
Seven Mile Hill II	Medicine Bow	WY
Slide Creek	Idleyld Park	OR
Snake Creek	Herber City	UT
Soda	Soda Springs	ID
Soda Springs	Idleyld Park	OR
Stairs	Salt Lake City	UT
Top of the World	Glenrock	WY

Table 1			
Facility Name	Facility City	Facility State	
Veyo	Veyo	UT	
Viva Naughton	Kemmerer	WY	
Wallowa Falls	Joseph	OR	
Weber	S. Ogden	UT	
Wolverine Creek	Bingham/Bonneville County	ID	

3. Identification of all procurement of unbundled renewable energy credits (RECs) during the period covered by the report.

Response:

There is no procurement of unbundled renewable energy credits included in PacifiCorp's 2011 Preliminary Annual 33% RPS Compliance Report.

4. Recommendations to remove impediments to making progress toward achieving the renewable energy resources procurement requirements established by statute and implemented by Commission decision.

Response:

PacifiCorp does not anticipate significant potential compliance delays, and therefore has no recommendations to remove impediments to making progress toward achieving the renewable energy resources procurement requirements.

III. Additional Narrative Reporting Requirements – Transmission Planning

Each retail seller that is also an electrical corporation must, in addition to the four items set forth above, include the following narrative information in each annual compliance report and in the final report for each compliance period:

1. The current status and progress made during the prior year toward construction of, and upgrades to, transmission and distribution facilities and other electrical system components owned by that electrical corporation to interconnect eligible renewable energy resources and to supply the electricity generated by those resources to load. The narrative must specifically include, but is not limited to, the status of planning, siting, and permitting of transmission facilities by federal, state, and local agencies.

Response:

The Company is a member of the Northern Tier Transmission Group (NTTG), the planning entity through which the Company demonstrates compliance with the regional planning

requirements of FERC Order 890. NTTG's 2010-2011 Biennial Transmission Plan¹ provides a regional perspective on the incremental transmission required to efficiently meet the growing load and resource needs of the region. The report is based on a roll-up of each NTTG transmission provider's local transmission plan², and generation assumptions include resources necessary to meet all applicable state renewable portfolio standards (RPS), including California's 33%-by-2020 standard.

PacifiCorp's Energy Gateway transmission projects, included in both the Company's IRP and in NTTG's regional transmission plan, play an important role in the Company's commitment to provide safe, reliable, reasonably priced electricity to meet the needs of customers. Energy Gateway's design and extensive footprint provides needed system reliability improvements and supports the development of a diverse range of cost-effective resources required for meeting customers' energy needs, including needs driven by California and other states' RPS requirements.

The first major segment of Energy Gateway – Populus to Terminal – was placed into service in November 2010. Construction began in May 2011 on the second major segment – Mona to Oquirrh, which is scheduled for completion in May 2013. Construction is scheduled to begin in May 2013 on the third major segment – Sigurd to Red Butte, which is scheduled to be in service in June 2015. Outreach, siting and permitting processes continue for additional segments, including Gateway West and Gateway South. The Energy Gateway projects are necessary to reliably move network resources to network loads provided in current and future IRPs. See Chapter 4 and Chapter 10 of PacifiCorp's 2011 IRP³, as well as the Energy Gateway Transmission Program Planning section of the 2011 IRP Update⁴, for detailed background, status and schedule information for the Energy Gateway expansion plan.

¹ NTTG 2010-2011 Biennial Transmission Plan report and materials: http://nttg.biz/site/index.php?option=com_docman&task=cat_view&gid=349&Itemid=31

² PacifiCorp's 2010-2011 Biennial Transmission System Plan: http://www.oasis.pacificorp.com/oasis/ppw/20111116_PacSysPlanRep2010-11.pdf

³ PacifiCorp's 2011 Integrated Resource Plan (March 2011): http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/2011IRP/2011IRP-MainDocFinal_Vol1-FINAL.pdf

⁴ PacifiCorp's 2011 IRP Update (March 2012): http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/2011IRPUpdate/2011IRPUpdate 3-30-12 REDACTED.pdf