

July 31, 2014

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) 2013 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 2013 Preliminary Annual 33% Renewables Portfolio Standard Compliance Reporting Worksheet (2013 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) 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. PacifiCorp's California service territory is not a part of the California Independent System Operator (CAISO) balancing authority area, 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.

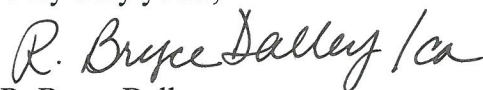
The 2013 Preliminary Report is structured to report on contracted resources. However, PacifiCorp's resource portfolio includes a mix of utility owned resources and contracted resources. Therefore, where PacifiCorp has provided information on the PacifiCorp-owned resources the following data was used on the Procurement Detail tab:

Preliminary Report Contract Data	Utility Owned Resource Data
Contract Execution Date (Column AE)	Commercial Operation Date in WREGIS
Contract Volume (MWh) (Column AF)	Estimated annual volume based on the average volumes of years 2011-2013; This assumption was also used for Contracts where no volumes were identified in the contract
California Compliance Eligible Procurement for 2011 - 2013	WREGIS certificate volumes retired and reported to the CEC

On the 36 Month Retirement tab, for the Facility Name, the instructions require for facilities not interconnected to a CBA, "Retail sellers must enter the facility's source name, as registered with OATI's webRegistry. This applies mainly to facilities not directly connected to a CBA." (See "Instructions" tab of 2012 Preliminary Report.) Also, as indicated in PacifiCorp's comments filed on June 21, 2013,¹ PacifiCorp does not register its resources with OATI's webRegistry. In lieu of that data, PacifiCorp is listing the facility name as identified on the WREGIS certificates.

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

Very truly yours,



R. Bryce Dalley
Vice President, Regulation

Enclosures

¹ *PacifiCorp's Comments on CPUC Portfolio Content Category Classification Staff Proposal (CPUC Draft MJU Template Circulated on June 17, 2013) Filed June 21, 2013.*