

June 28, 2007

VIA HAND DELIVERY

California Public Utilities Commission
Energy Division, 4th Floor
505 Van Ness Avenue
San Francisco, CA 94102 – 3298

Attn: Brian Schumacher

**RE: PacifiCorp's (U 901-E) 2006 Annual Report of Inspection Activities Filed
Pursuant to General Order No. 165**

Pursuant to General Order No. 165, PacifiCorp provides an original and one (1) copy of the attached 2006 annual report of inspection activities for electric distribution facilities.

It is respectfully requested that all formal correspondence and Staff requests regarding this matter be addressed to:

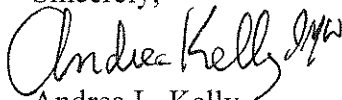
By E-mail (preferred): datarequest@PacifiCorp.com

By Fax: (503) 813 – 6060

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquires may be directed to Cathie Allen, Regulatory Manager at (503) 813 - 5934.

Sincerely,



Andrea L. Kelly
Vice President, Regulation

Enclosure

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

Commission Order Instituting Investigation
into the rates, charges, services, and practices of
Pacific Gas and Electric
Company. (U 39 M)

I.95-02-015
(Filed February 22, 1995)

Order Instituting Rulemaking for electric
distribution facility standard setting.

R.96-11-004
(Filed November 8, 1996)

**PACIFICORP'S (U 901 E)
2006 ANNUAL REPORT OF INSPECTION ACTIVITIES FILED
PURSUANT TO GENERAL ORDER NO. 165**

Ryan L. Flynn
PacifiCorp
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June 28, 2007

Attorney for PacifiCorp

PacifiCorp
Inspection and Maintenance Programs
California 2006

The attached sheets demonstrate the status of 2006 Inspections, Conditions found and Corrections in the state of California for PacifiCorp owned facilities. PacifiCorp has four districts in California: Tulelake, Alturas, Crescent City and Yreka/Mt. Shasta.

Inspections

Inspections of poles and equipment were completed in 2006 for Urban & Rural Patrol, Detail and Intrusive inspection types. The information includes the type of equipment, the plan for each inspection category and the actual results of the inspection plan.

Conditions

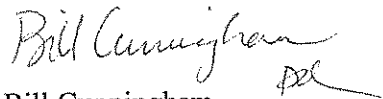
Conditions found by the inspections were rated as either A or B priority, with A priority requiring more immediate action than B priority conditions. All A priority conditions will be completed as soon as possible but in no case later than 12/31/2007. The B priority conditions found in 2006 are being prioritized and will be completed per Company policy.

The report outlines the following requirements aggregated by district:

- number of conditions found in 2006;
- number of conditions corrected as of December 31, 2006;
- number of conditions outstanding as of December 31, 2006; and
- correction target for immediate hazard and lower priority conditions.

Dated in Portland, Oregon this 26th day of June, 2007

Respectfully Submitted,



Bill Cunningham
Managing Director
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Portland, OR 97232
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TABLE A-1
GENERAL ORDER 165 ANNUAL REPORT - 2006

Reporting Period: 01/01/06 - 12/31/06

PacifiCorp Wood Pole Inspections

Visual Assurance & Detail Inspections

DISTRICT	NO. OF FACILITIES		OH Safety (Patrol)	% Compliance Distribution	% Compliance Transmission (Dist. & Trans.)	% Compliance (Dist. & Trans.)	INSPECTION TYPE		% Compliance Distribution	% Compliance Transmission	% Compliance (Dist. & Trans.)	% Comp. per Inspections Done
	Distribution Poles	Transmission Poles					OH Detail	% Comp. per Inspections Done				
Inspection Cycle												
Tulare	13,488	1,719	7,502	67%	92%	70%	49%	3,536	96%	80%	94%	23%
Alturas	4,567	1,127	2,935	63%	100%	71%	52%	697	92%	100%	94%	12%
Crescent City	9,458	909	9,938	73%	92%	75%	96%	3,933	89%	100%	90%	38%
Yreka/Mt. Shasta	34,328	2,846	29,576	85%	96%	85%	80%	11,468	83%	100%	84%	31%
Main Grd	0	3,702	8,815	n/a	99%	99%	238%	1,571	n/a	100%	100%	42%
California Totals	61,841	10,303	59,066			81%	82%	21,205			89%	29%

1. Percentage of Compliance for the 2006 General Order 165 Annual Report for Visual Assurance and Detail Inspections is based on a point by point analysis of each facility's inspection records comparing the last inspection date for each inspection type (visual assurance or detail inspection) through December 31, 2006.

2. If a facility point has not undergone a visual assurance inspection in the previous two calendar years from 1/1/2007, or a detail inspection in the previous five calendar years from 1/1/2007, the facility point is out of compliance.

a. As of January 1, 2007, PacifiCorp has initiated a project to identify all out of compliance facility points for visual assurance and detail inspections.

b. If a facility point is out of compliance for either inspection type (visual assurance or detail inspection) on January 1, 2007, the facility will be inspected and in compliance by December 31, 2007.

Test and Treat (Intrusive) Inspections

DISTRICT	NO. OF FACILITIES		OH Test & Treat (Intrusive)	% Intrusive Inspections Completed
	Distribution Poles	Transmission Poles		
Inspection Cycle				
Tulare	13,488	1,719	1,321	9%
Alturas	4,567	1,127	334	6%
Crescent City	9,458	909	1,316	13%
Yreka/Mt. Shasta	34,328	2,846	3,185	9%
Main Grd	0	3,702	0	0%
California Totals	61,841	10,303	6,156	9%

1. Percentage of Compliance for the 2006 General Order 165 Annual Report for Test and Treat (Intrusive) Inspections is based on a systemwide average of the number of inspections performed on the total population of facility points in each District. Effective with the company's 2007 Annual Report, the Percentage of Compliance for the Test and Treat (Intrusive) inspections will be based on a point by point analysis.

TABLE A-2
GENERAL ORDER 165 ANNUAL REPORT - 2006

Reporting Period: 01/01/06- 12/31/06

PacifiCorp Line Equipment Inspections

District/Equipment	Type	QTY	Safety (Patrol) Rural ⁽¹⁾			Detailed Rural ⁽¹⁾		
			Plan ⁽²⁾ 2 Yrs	Actual	% Complete 50%	Plan ⁽²⁾ 4 or 5 Yrs	Actual	% Complete 20-25%
Tulelake								
Transformers	Overhead	2590	1,295	1,685	49%	518	794	23%
Switch/Protect Device	Overhead	778	389					
Regs/Caps	Overhead	48	24					
All	Pad Mounted	81				20	22	28%
Total			1,708	1,685	49%	703	817	23%
Alturas								
Transformers	Overhead	1056	528	630	52%	211	150	12%
Switch/Protect Device	Overhead	165	83					
Regs/Caps	Overhead	1	1					
All	Pad Mounted	45				11	20	44%
Total			611	630	52%	256	169	13%
Crescent City								
Transformers	Overhead	3488	1,744	5,208	96%	698	2,061	38%
Switch/Protect Device	Overhead	1943	972					
Regs/Caps	Overhead	2	1					
All	Pad Mounted	1166				292	146	12%
Total			2,717	5,208	96%	1,378	2,207	33%
Yreka/Mt. Shasta								
Transformers	Overhead	9214	4,607	12,645	80%	1,843	4,854	31%
Switch/Protect Device	Overhead	6419	3,210					
Regs/Caps	Overhead	101	51					
All	Pad Mounted	3370				843	442	13%
Total			7,867	12,645	80%	3,989	5,296	28%
California Totals								
Transformers	Overhead	16348	8,174	20,168	82%	3,270	7,859	29%
Switch/Protect Device	Overhead	9305	4,653					
Regs/Caps	Overhead	152	76					
All	Pad Mounted	4662				1,166	630	14%
Total			12,903	20,168	82%	6,327	8,489	28%

NOTES:

1. PacifiCorp has no Urban area in its California service territory.

Urban is defined as those areas with a population of more than 1,000 persons per square mile and Rural as those with a population less than 1,000 persons per square mile as determined by the U.S. Bureau of the Census. U. S. Bureau of the Census reports the population densities below (using 2006 Estimated Census data)

7.1 persons/sq.mi.	Siskiyou County (Tulelake, Yreka, Mt. Shasta)
28.7 persons/sq.mi.	Del Norte County (Crescent City)
2.4 persons/sq.mi.	Modoc County (Alturas)

2. Planned inspection cycles:	<u>Patrol</u>	<u>Detailed</u>
Overhead	2 years	5 years
Pad Mounted		4 years

3. Due to calendar year reporting vs. fiscal year operations, some variances to plan are artifacts of these timing differences.

4. Percentage Complete for Visual Assurance and Detail Inspections are based on a systemwide average of inspections performed on the total population of facility points in each District.

TABLE B-1
GENERAL ORDER 165 ANNUAL REPORT - 2006

Reporting Period: 01/01/06 - 12/31/06

PacifiCorp Wood Pole Conditions

DISTRICT	CONDITIONS FOUND		CONDITIONS CORRECTED		REMOVED FROM SYSTEM		CONDITIONS OUTSTANDING		REASON WHY CORRECTION IS OUTSTANDING	DATE CORRECTION WILL BE COMPLETED BY
	A	B	A	B	A	B	A	B		
Tulelake	25	41	26	71	0	2	9	44	A conditions planned to be completed by end of 2007; B conditions planned to be completed consistent with company policy	Per note
Alturas	5	14	5	0	0	0	0	14	A conditions planned to be completed by end of 2007; B conditions planned to be completed consistent with company policy	Per note
Crescent City	75	98	56	30	6	6	20	97	A conditions planned to be completed by end of 2007; B conditions planned to be completed consistent with company policy	Per note
Yreka/Mt. Shasta	46	197	80	439	10	37	15	579	A conditions planned to be completed by end of 2007; B conditions planned to be completed consistent with company policy	Per note
California Total	151	350	167	540	16	45	44	734		

PacifiCorp Street Light Conditions

DISTRICT	CONDITIONS FOUND		CONDITIONS CORRECTED		REMOVED FROM SYSTEM		CONDITIONS OUTSTANDING		REASON WHY CORRECTION IS OUTSTANDING	DATE CORRECTION WILL BE COMPLETED BY
	A	B	A	B	A	B	A	B		
Tulelake	0	6	0	0	0	0	0	7	B conditions planned to be completed consistent with company policy	Per note
Alturas	0	18	0	14	0	0	0	20	B conditions planned to be completed consistent with company policy	Per note
Crescent City	0	20	0	3	0	0	0	18	B conditions planned to be completed consistent with company policy	Per note
Yreka/Mt. Shasta	0	116	1	31	0	18	0	157	A conditions planned to be completed by end of 2007; B conditions planned to be completed consistent with company policy	Per note
California Total	0	160	1	48	0	18	0	202		

Effective 1/1/2007, 'C' Priority Conditions will be identified and tracked separately from 'B' priority conditions.

TABLE B-2
GENERAL ORDER 165 ANNUAL REPORT - 2006

Reporting Period: 01/01/06 - 12/31/06

PacifiCorp Equipment Conditions

DISTRICT	Type	CONDITION RATING FOUND		CORRECTIVE ACTIONS COMPLETED		REMOVED FROM SYSTEM		CONDITIONS OUTSTANDING		REASON WHY CORRECTION IS OUTSTANDING	DATE CORRECTION WILL BE COMPLETED BY
		A	B	A	B	A	B	A	B		
Tulelake											
Transformers	Overhead	0	25	0	1	0	0	0	27	B conditions planned to be completed consistent with company policy	Per note
Switch/Protect Device	Overhead	0	0	1	1	1	0	0	0	A conditions planned to be completed by end of 2007; B conditions planned to be completed consistent with company policy	Per note
Regs/Caps	Overhead	0	0	0	0	0	0	0	0		
All	Padmounted	0	1	0	0	0	0	0	1	B conditions planned to be completed consistent with company policy	Per note
Alturas											
Transformers	Overhead	0	4	0	1	0	0	0	4	B conditions planned to be completed consistent with company policy	Per note
Switch/Protect Device	Overhead	0	0	1	0	0	0	0	0	A conditions planned to be completed by end of 2007	12/31/2007
Regs/Caps	Overhead	0	0	0	0	0	0	0	0		
All	Padmounted	0	0	0	0	0	0	0	0		
Crescent City											
Transformers	Overhead	0	25	2	2	0	0	0	28	A conditions planned to be completed by end of 2007; B conditions planned to be completed consistent with company policy	Per note
Switch/Protect Device	Overhead	0	0	0	0	0	0	0	0		
Regs/Caps	Overhead	0	0	0	0	0	0	0	0		
All	Padmounted	0	0	0	0	0	0	0	1	B conditions planned to be completed consistent with company policy	Per note
Yreka											
Transformers	Overhead	2	381	10	75	1	16	0	390	A conditions planned to be completed by end of 2007; B conditions planned to be completed consistent with company policy	Per note
Switch/Protect Device	Overhead	0	1	0	1	0	0	0	7	B conditions planned to be completed consistent with company policy	Per note
Regs/Caps	Overhead	0	2	0	0	0	0	0	2	B conditions planned to be completed consistent with company policy	Per note
All	Padmounted	8	7	10	0	0	0	1	19	A conditions planned to be completed by end of 2007; B conditions planned to be completed consistent with company policy	Per note
Mt. Shasta											
Transformers	Overhead	0	0	0	0	0	0	0	0		
Switch/Protect Device	Overhead	0	0	0	0	0	0	0	0		
Regs/Caps	Overhead	0	0	0	0	0	0	0	0		
All	Padmounted	0	0	0	0	0	0	0	0		
CA Total											
Transformers	Overhead	2	435	12	79	1	16	0	449		
Switch/Protect Device	Overhead	0	1	2	2	1	0	0	7		
Regs/Caps	Overhead	0	2	0	0	0	0	0	2		
All	Padmounted	8	8	10	0	0	0	1	21		
California Totals		10	445	24	81	2	16	1	479		

Effective 1/1/2007, 'C' Priority Conditions will be identified and tracked separately from 'B' priority conditions.