



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

June 30, 2008

VIA OVERNIGHT DELIVERY

Paul Clanon, Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

RE: PacifiCorp's (U 901-E) 2007 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 2007 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 inquiries may be directed to Cathie Allen, Regulatory Manager, at (503) 813-5934.

Sincerely,

Andrea L. Kelly
Vice President, Regulation

cc: Brian D. Schumacher

**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) IMPLEMENTATION PLAN FOR INSPECTIONS USING
INDICES SET FORTH IN APPENDIX A OF D.97-03-070**

FOR THE CALENDAR YEAR 2007

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Date: June 30, 2008

Attorney for PacifiCorp

PacifiCorp
Inspection and Maintenance Programs
California 2007

The attached sheets demonstrate the status of 2007 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 2007 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

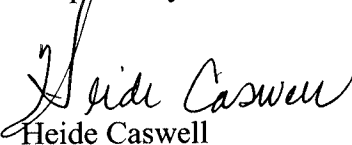
Conditions found by the inspections were rated as either A or B priority, with A priority requiring more immediate action than B priority conditions. All A priority conditions will be completed as soon as possible, but in no case later than December 31, 2008. The B priority conditions found in 2007 are being prioritized and will be completed per Company policy.

The report outlines the following requirements aggregated by district:

- Number of conditions found in 2007;
- Number of conditions corrected as of December 31, 2007;
- Number of conditions outstanding as of December 31, 2007; and
- Correction target for immediate hazard and lower priority conditions.

Dated in Portland, Oregon, this 27th day of June, 2008.

Respectfully submitted,



Heide Caswell

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TABLE A-1
2007 GENERAL ORDER 165 ANNUAL REPORT

Reporting Period: 01/01/07 - 12/31/07

PacifiCorp Wood Pole Inspections

Visual Assurance & Detail Inspections

DISTRICT	NO. OF FACILITIES		INSPECTION TYPE									
	Distribution Poles	Transmission Poles	O/H Safety (Patrol)	% Compliance Distribution [2]	% Compliance Transmission [2]	% Compliance (Dist. & Trans.) [2]	% of Total Poles Inspected [3]	O/H Detail	% Compliance Distribution [2]	% Compliance Transmission [2]	% Compliance (Dist. & Trans.) [2]	% of Total Poles Inspected [3]
Inspection Cycle			2 Yrs				50%	5 Yrs				20%
Tulelake	13,544	1,738	10,240	99%	98%	99%	67%	3,855	99%	98%	99%	25%
Alturas	4,606	1,106	2,551	92%	100%	93%	45%	876	100%	100%	100%	15%
Crescent City	9,966	1,270	4,723	96%	100%	96%	42%	1,561	100%	100%	100%	14%
Yreka/Mt. Shasta	35,252	3,453	18,103	99%	97%	98%	47%	7,256	99%	86%	98%	19%
Main Grid	0	1,684	4,716	n/a	95%	95%	280%	1,454	n/a	99%	99%	86%
California Totals	63,368	9,251	40,333			97%	56%	15,002			99%	21%

Notes:

- [1] Reporting unit basis for PacifiCorp is facility point.
- [2] Percentage of compliance for the 2007 General Order 165 Annual Report for Visual Assurance & Detail inspections is based on a point by point analysis of the inspection records for each facility due comparing the last inspection date for each inspection type (visual assurance or detail inspection) through Dec. 31st, 2007.
- [3] Percentage of Total pole population inspected for the 2007 General Order 165 Annual Report in each District.
 - a. As of January 1st, 2007, PacifiCorp has initiated a project to identify all facilities out of compliance for visual assurance and detail inspections. PacifiCorp is in the process of bringing all facility points into compliance using the maintenance inspection schedules outlined by Asset Management.
 - b. If it is concluded that a facility point is out of compliance for either inspection type (visual assurance or detail inspection) the facility will undergo the respective inspection type and brought into compliance by December 31st of the reporting year.
 - c. PacifiCorp has implemented a 2 year stand alone visual assurance inspection to all UG facility points to begin in CY2008.

Test and Treat (Intrusive) Inspections

DISTRICT	NO. OF FACILITIES		O/H Test & Treat (Intrusive) Inspection	% of Total Poles w/Intrusive Inspection [1]
	Distribution Poles	Transmission Poles		
Inspection Cycle			10 Yrs	7%
Tulelake	13,544	1,738	1,120	8%
Alturas	4,606	1,106	478	10%
Crescent City	9,966	1,270	705	7%
Yreka/Mt. Shasta	35,252	3,453	2,956	8%
Main Grid	0	1,684	0	0%
California Totals	63,368	9,251	5,259	8%

- [1] Percentage of intrusive inspections completed for the 2007 General Order 165 Annual Report for Test and Treat (intrusive) inspections is based on a system wide average of the number of inspections performed on the total population of facility points in each District.
 - a. In the future the Percentage of Compliance for the Test and Treat (intrusive) inspections will be based on a point by point analysis.
 - b. Facility points found to be out of compliance based on point by point analysis for Test and Treat inspections will be identified by 12/31 of each calendar year.

TABLE A-2
2007 GENERAL ORDER 165 ANNUAL REPORT

Reporting Period: 01/01/07- 12/31/07

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	1,327	1,723	50%	443	558	16%
Switch/Protect Device	Overhead	778	398					
Regs/Caps	Overhead	48	25					
All	Pad Mounted**	81				10	1	2%
Total			1,750	1,723	50%	594	559	16%
Alturas								
Transformers	Overhead	1056	527	508	42%	201	232	19%
Switch/Protect Device	Overhead	165	82					
Regs/Caps	Overhead	1	0					
All	Pad Mounted**	45				7	7	15%
Total			610	508	42%	239	239	19%
Crescent City								
Transformers	Overhead	3488	1,563	2,206	41%	552	851	16%
Switch/Protect Device	Overhead	1943	871					
Regs/Caps	Overhead	2	1					
All	Pad Mounted**	1166				233	227	19%
Total			2,435	2,206	41%	1,092	1,078	16%
Yreka/Mt. Shasta								
Transformers	Overhead	9214	4,489	7,444	47%	1,840	3,027	19%
Switch/Protect Device	Overhead	6419	3,127					
Regs/Caps	Overhead	101	49					
All	Pad Mounted**	3370				1,060	966	29%
Total			7,665	7,444	47%	4,201	3,993	21%
California Totals								
Transformers	Overhead	16348	7,966	12,001	47%	3,046	4,656	18%
Switch/Protect Device	Overhead	9305	4,534					
Regs/Caps	Overhead	152	74					
All	Pad Mounted**	4662				1,317	1,205	26%
Total			12,573	12,001	47%	6,125	5,861	19%

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 cycle:

	<u>Patrol</u>	<u>Detailed</u>
Overhead	2 years	5 years
Pad Mounted	**	4 years

** PacifiCorp has implemented a 2 year stand alone visual assurance inspection to all UG facility points to begin in CY2008

[3] Percentage complete for Visual Assurance and Detail Inspections for line equipment is based on a system wide percentage of inspections performed on the total population of facility points in each District.

TABLE B-1
2007 GENERAL ORDER 165 ANNUAL REPORT

Reporting Period: 01/01/07 - 12/31/07

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	C	A	B	C	A	B	C	A	B	C		
Tulelake	13	63	0	22	48	0	0	1	0	0	58	0	A's & B's planned to be completed consistent with company policy	Per note
Alturas	0	17	0	0	15	0	5	1	0	0	16	0	A's & B's planned to be completed consistent with company policy	Per note
Crescent City	4	34	0	19	21	0	0	0	0	0	108	0	A's & B's planned to be completed consistent with company policy	Per note
Yreka/Mt. Shasta	43	205	16	46	316	1	5	48	1	7	419	16	A's B's & C's planned to be completed consistent with company policy	Per note
California Total	60	319	16	87	400	1	10	50	1	7	601	16		

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	C	A	B	C	A	B	C	A	B	C		
Tulelake	0	0	0	0	7	0	0	0	0	0	0	0		Per note
Alturas	0	4	0	0	20	0	0	0	0	0	4	0	B's planned to be completed consistent with company policy	Per note
Crescent City	0	6	0	0	10	0	0	0	0	0	14	0	B's planned to be completed consistent with company policy	Per note
Yreka/Mt. Shasta	0	290	2	0	25	0	0	59	0	0	362	2	B's & C's planned to be completed consistent with company policy	Per note
California Total	0	300	2	0	62	0	0	59	0	0	380	2		

TABLE B-2
2007 GENERAL ORDER 165 ANNUAL REPORT

Reporting Period: 01/01/07 - 12/31/07

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	C	A	B	C	A	B	C	A	B	C		
Tulelake															
Transformers	Overhead	0	32	1	0	27	0	0	0	0	0	32	1	B's & C's planned to be completed consistent with company policy	Per note
Switch/Protect Device	Overhead	0	2	0	0	0	0	0	0	0	0	2	0	B's planned to be completed consistent with company policy	Per note
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
All	Padmounted	0	0	0	0	0	0	0	0	0	0	1	0	B's planned to be completed consistent with company policy	Per note
Alturas															
Transformers	Overhead	0	0	2	0	4	0	0	0	0	0	0	2	B's & C's planned to be completed consistent with company policy	Per note
Switch/Protect Device	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
All	Padmounted	0	0	0	0	0	0	0	0	0	0	0	0		
Crescent City															
Transformers	Overhead	1	116	1	1	22	0	0	0	0	0	122	1	A's, B's & C's planned to be completed consistent with company policy	Per note
Switch/Protect Device	Overhead	0	1	0	0	0	0	0	0	0	0	1	0	B's planned to be completed consistent with company policy	Per note
Regs/Caps	Overhead	0	1	0	0	0	0	0	0	0	0	1	0	B's planned to be completed consistent with company policy	Per note
All	Padmounted	0	1	0	0	1	0	0	0	0	0	1	0	B's planned to be completed consistent with company policy	Per note
Yreka															
Transformers	Overhead	8	435	18	8	83	0	0	39	0	0	702	19	A's, B's & C's planned to be completed consistent with company policy	Per note
Switch/Protect Device	Overhead	1	2	0	1	6	0	0	1	0	0	2	0	A's & B's planned to be completed consistent with company policy	Per note
Regs/Caps	Overhead	0	4	0	0	2	0	0	0	0	0	4	0	B's planned to be completed consistent with company policy	Per note
All	Padmounted	3	23	4	4	5	0	0	1	0	0	36	4	A's, B's & C's planned to be completed consistent with company policy	Per note
Mt. Shasta															
Transformers	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
Switch/Protect Device	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
All	Padmounted	0	0	0	0	0	0	0	0	0	0	0	0		
CA Total															
Transformers	Overhead	9	583	22	9	136	0	0	39	0	0	856	23		
Switch/Protect Device	Overhead	1	5	0	1	6	0	0	1	0	0	5	0		
Regs/Caps	Overhead	0	5	0	0	2	0	0	0	0	0	5	0		
All	Padmounted	3	24	4	4	6	0	0	1	0	0	38	4		
California Totals		13	617	26	14	150	0	0	41	0	0	904	27		