



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

March 1, 2012

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) Report on System Reliability as required by
Decision 96-09-045 / Application 94-12-005 / Investigation 95-02-015**

Enclosed for filing is a copy of PacifiCorp's, d.b.a. Pacific Power, Report on System Reliability for the 2011 reporting period using the indices developed in Appendix A of Commission Decision (D.) 96-09-045 as amended by PacifiCorp's January 14, 2011 Advice Letter Filing 433-E.

As noted in your letter to PacifiCorp dated August 27, 2010, Southern California Edison recommended the adoption of the Institute of Electrical and Electronic Engineers (IEEE) standard for definition of major event days which would 1) provide consistency in comparing reliability data from different utilities across the country, and 2) provide more objectivity in the determination of what major events are excludable for the purpose of calculating the reliability indices. The letter further stated that if PacifiCorp agreed with this proposal, the Company should submit an advice letter requesting this change. PacifiCorp supports the proposed use of IEEE Standard 1366-2003 to categorize major events and on January 14, 2011, filed Advice Letter 433-E requesting approval for making this change in its reporting requirements under D. 96-09-045.

As stated in Advice Letter 433-E, to smooth the transition to the new reporting criterion and to enable the comparison of values calculated under both methods, beginning with its March 2011 compliance filing, PacifiCorp reported using both methods. PacifiCorp will continue to report using both of these methods through its March 1, 2014 compliance filing, after which time the Company will only report the IEEE 1366-2003 calculation.

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

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

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

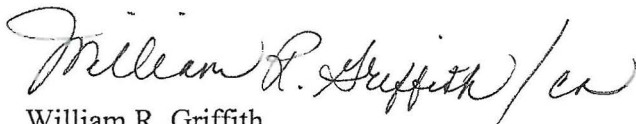
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Informal inquiries may be directed to Heide Caswell, Director, Network Performance, at (503) 813-6216, or Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

A handwritten signature in cursive script that reads "William R. Griffith / cr". The signature is written in black ink and is positioned above the typed name and title.

William R. Griffith
Vice President, Regulation

Enclosure

cc: Ed Randolph – CPUC
Liza Malashenko – CPUC
David K. Lee – CPUC