

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



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Order Instituting Rulemaking to Continue
Implementation and Administration of
California Renewables Portfolio Standard
Program

Rulemaking 11-05-005
(Filed May 5, 2011)

**RESPONSE OF PACIFICORP TO ADMINISTRATIVE LAW JUDGE'S RULING
REQUIRING A SUPPLEMENTAL FILING TO THE 2013 PROCURMENT PLANS TO
ADDRESS SAFETY CONSIDERATIONS**

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August 28, 2013

Attorney for PacifiCorp

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On July 24, 2013, Administrative Law Judge (ALJ) Regina M. DeAngelis issued a Ruling Requiring Supplemental Filing to the 2013 Procurement Plans to Address Safety Considerations (the Ruling). The Ruling directed all entities required to file 2013 Renewables Portfolio Standard (RPS) Procurement Plans to file supplemental filings addressing safety considerations. Although PacifiCorp, d/b/a Pacific Power (PacifiCorp or Company), is not required to submit an RPS Procurement Plan,¹ PacifiCorp submits this supplemental response in accordance with the Ruling and instructions from ALJ DeAngelis. The California Public Utilities Commission (Commission) defers to PacifiCorp's (PacifiCorp or the Company) use of its comprehensive Integrated Resource Plan (IRP) and IRP supplement in lieu of requiring PacifiCorp to file a separate plan to meet its RPS planning requirements.² Below, PacifiCorp

¹ See Pub. Util. Code § 399.17(d).

² Rulemaking 06-02-012, D.08-05-029, *Decision on Participation of Small and Multi-Jurisdictional Utilities in Renewable Portfolio Standard Program*, (May 29, 2008) (as modified by D.09-11-014) (D.08-05-029); see also Cal. Pub. Util. Code §399.17. PacifiCorp's IRP was filed April 30, 2013. The IRP On-Year Supplement was filed May 30, 2013.

provides the Commission with more information regarding the Company's approach to safety and the procurement of RPS-eligible resources.

The Company is committed to promoting the health, safety, comfort and convenience of customers and the public at large. Indeed, safety for PacifiCorp employees, customers, and stakeholders is one of PacifiCorp's six core principles. PacifiCorp has developed and implemented various programs to help customers, employees, and stakeholders understand their own personal safety. In 2012 PacifiCorp received Prestigious Member Recognition from the National Safety Council for holding safety as a core value and making safety a priority in business. In 2013 PacifiCorp received the Occupational Excellence Achievement Award from the National Safety Council for working to reduce on the job injuries.

The Company complies with all applicable safety codes, including but not limited to, the National Electric Safety Code, the Occupational Health and Safety Act, and any applicable state health and safety act requirements, at all of its generation facilities, including generation facilities that are used to comply with California's RPS program. Certain safety codes may also be applicable to the operation of the Company's transmission and distribution facilities. PacifiCorp has developed standards that meet or exceed the National Electrical Safety Code. Employees are trained in work practice regulations and safety protocols along with Company construction standards to the highest standards and consistency. Beyond required safety training, the Company routinely provides additional employee safety education and training on topics such as appropriate lock-out/tag-out procedures and standard operating procedures. PacifiCorp's generation facilities are subject to routine inspections to identify operational issues, including those that could cause impact to the public health or employee safety. Through participation with national and regional organizations such as the National Safety Council, the Western

Energy Institute, and the Edison Electric Institute, the Company has developed best practices for safety that reflect the collective wisdom of a variety of stakeholders.

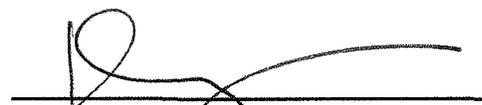
The Company satisfies some of its RPS compliance obligation through non-utility owned generation. The Company includes safety provisions and standards in its contracts for the RPS-eligible resources. This includes mandatory compliance requirements for the seller for all applicable prudent electrical practices, including all safety standards, safety requirements for plant visits, and requirements to comply with all applicable laws and regulations, including those relating to safety.

The Company also works to develop teamwork to mitigate safety risks and has developed and implemented programs to continue improvement in safety. In addition, the Company continuously communicates safety goals in order to stay consistently on message across the organization. These programs include training and communicating from the top down, consistently delivering the same safety message and programs to all locations, and auditing the communications and programs. The Company sends daily emails to all of its employees noting accident reports and containing general reminders about safety. Other examples of the Company's commitment to safety include: periodic emails with general safety tips for workplace and personal safety, safety committees for each floor of its corporate offices and field offices, annual safety training requirements which are linked to each employee's performance review, daily hazard assessment meetings for field offices, and annual evacuation drills.

The Company prioritizes safety, not only with regard to California's RPS program, but for all resources and to the benefit of all employees, customers, and stakeholders. PacifiCorp appreciates the opportunity to submit these supplemental comments detailing its commitment to safety.

Dated: August 28, 2013

Respectfully submitted,



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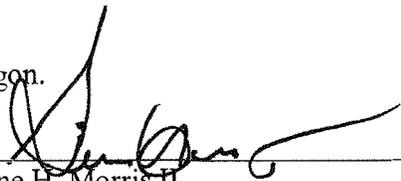
Attorney for PacifiCorp

VERIFICATION

I am the Director of Environmental Health and Safety of the respondent corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2013 at Portland, Oregon.



Eugene H. Morris II
Director of Environmental Health and Safety